

**Commonwealth of the Northern Mariana Islands (CNMI)**

**Department of Finance**

**GROUP HEALTH AND LIFE  
INSURANCE TRUST FUND  
(GHLI)**

**INTERNAL PROCEDURES**



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## Section 1: PURPOSE

The Group Health and Life Insurance Trust Fund (GHLI) program was established to address the health and life insurance liabilities for government employees and retirees, including coverage for medical expenses, other health-related costs, and life insurance coverage. The primary purpose of GHLI was to manage and cover the health and life insurance liabilities of the CNMI government and all autonomous agencies. This includes ensuring that funds are collected and remitted to for health and life insurance needs of current and former government employees and their families. As well as the life insurance coverage.

### Section 1.1 Background

Public Law 19-60, enacted in 2016 by the CNMI Legislature, was created to improve the management and accountability of the Government's Group Health and Life Insurance (GHLI) programs. The law transferred oversight responsibilities from the Northern Mariana Islands Retirement Fund to the Department of Finance, established a segregated fund for GHLI contributions, and repealed outdated legal provisions. These changes aimed to strengthen transparency, streamline administration, and safeguard both employee and employer contributions.

The Group Life and Health Insurance programs were originally administered by the Personnel Office. Executive Order 94-3 § 307(c) (effective Aug. 23, 1994) transferred the administration of the programs to the Department of Finance. See Executive Order 94-3, reprinted in the commission comment to 1 CMC § 2001; see also PL 10-19 § 1, reprinted in the commission comment to 1 CMC § 8421. PL 10-19 (effective June 21, 1996), codified at 1 CMC §§ 8421- 8427, transferred the administration of the government life and health insurance programs to the NMIRF. See 1 CMC § 8421. In 1995, the Department of Finance adopted Group Health Insurance Program (GHIP) Regulations pursuant to Executive Order 94-3 § 307(c). The history of the 1995 DOF regulations is as follows: Adopted 17 Com. Reg. 12721 (Jan. 15, 1995); Proposed 16 Com. Reg. 12663 (Dec. 15, 1994). NMIRF first promulgated Group Health and Life Insurance Program Rules and Regulations in May 1997. In October 1997, NMIRF repealed the Group Health Insurance Program provisions of the May 1997 regulations and promulgated new rules and regulations governing the Group Health Insurance Program with extensive revisions. See § 110-30.1-001 of this subchapter and the commission comment thereto. The 2002 Group Health Insurance Program Rules and Regulations, codified in this subchapter, readopted, and republished the GHIP regulations in their entirety with extensive amendments. The 2003 amendments again repromulgated the Group Health Insurance Program Rules and Regulations in their entirety. The 2012 amendments repealed and re-promulgated the subchapter in its entirety. The history sections in this subchapter date from the October 1997 regulations.

[View Full Law here.](#)

## Section 1.2 Applicable Statutes

- Chapter 110-30: Group Health and Life Insurance Program
  - Subchapter 110-30.1: Group Health Insurance Program Rules and Regulations. [View](#).
  - Subchapter 110-30.2: Group Life Insurance Program Rules and Regulations. [View](#).
- 1 CMC § 8421. Administration of the Government Life and Health Insurance Programs. [View](#).
- 1 CMC § 8422. Participation in Group Health and Life Insurance Plans. [View](#).
- 1 CMC § 8423. Ratification of Actions. [View](#).
- 1 CMC § 8424. Rules and Regulations. [View](#).
- 1 CMC § 8425. Public Auditor. [Repealed]. [View](#).
- 1 CMC § 8426. Ratification of Actions. [Repealed]. [View](#).
- 1 CMC § 8427. Liabilities of the Government Life and Health Insurance Programs. [Repealed]. [View](#).
- Public Law No. 19-60. [View](#).

## Section 1.3 Definition and Acronym

- Application/Change Form- means the form prescribed by the Administrator and required to be submitted to the Administrator by any person wishing to enroll himself or herself and/or his or her dependents in the program.
- Effective date- means the date on which a person is accepted as a subscriber, as established and recorded by the Administrator, and is the date on which such subscriber is first eligibility for benefits under this program.
- Fiscal year- means any October 1 through the following September 30.
- General Billing Invoice- GBI
- GHLI- means the CNMI government group health and life insurance program
- GHLI trust fund- is a fund that shall be segregated from other funds and held in trust and administered by the Administrator.
- NMIRF- Northern Mariana Islands Retirement Fund- as an autonomous agency and public corporation of the government of the Commonwealth of the Northern Mariana Islands. NMIRF, through a Board of Trustees, is empowered to establish, maintain, and operate a retirement fund program for the public employees of the Commonwealth.
- Retiree- means a former employee who is receiving annuity payments through the Northern Mariana Islands Retirement Fund or the Northern Mariana Islands Settlement Fund as a result of service, age or disability. The term “retiree” does not include a spouse or former spouse or domestic partner of a retiree receiving an annuity as a result of a domestic relations court order or any other individual receiving an annuity as a consequence of a relationship with a retiree.
- Spouse- means an employee’s or retiree’s current legal husband or wife from whom the employee or retiree is not legally separated.

- Subscriber- means any employee or retiree who is enrolled in the program and in whose name the enrollment is registered.
- Survivor- means the spouse or domestic partner of a deceased employee or retiree who is receiving a survivor annuity benefit under the laws governing the NMI Retirement Fund and NMI Settlement Fund (which requires that they have not remarried).

## Section 1.4 Effective Date

The GHLI Procedures will be effective **October1, 2025** and the following GHLI activities will be enforced.

## Section 2: SUBSCRIBER PROCESS AND COLLECTIONS

The cost of health insurance under the GHLI program is determined each year based on the group policy that is negotiated annually. For every subscriber or survivor enrolled, the premium is split—half is paid by the subscriber or survivor, and the other half is covered by either the government or the NMI Retirement Fund, depending on whether the enrollee is an active employee, retiree, or survivor.

To make things simple, these contributions are usually deducted directly from paychecks or benefit checks. However, if an employee is on leave without pay, they are required to pay the full amount (100% of the premium) in advance. Similarly, if a retiree or survivor's benefit check is not enough to cover their half, they must pay the difference directly to the GHLI trust fund before the premium is due.

Government agencies, public corporations, and other entities that handle their own payroll must send the total premiums, both their share and the amounts deducted from employees, within five working days after the end of each pay period. The Department of Finance follows the same rule for the employees it manages. Likewise, the NMI Retirement Fund must remit the premiums for retirees and survivors within five working days after each benefit pay period.

If the GHLI trust fund does not receive the required payments by the 10th working day after a pay period or benefit date, interest will be charged on the overdue amount. Ultimately, it is the shared responsibility of the subscriber or survivor and the respective paying agency to ensure that premiums are paid fully and on time.

The following are GHLI's processes:

- A. Enrollment Section
- B. CNMI Government Employee and Employer Deductions Section
- C. GBI Process Section
- D. Active Employees (EE) and Employer (ER) Share Section
- E. Settlement retirees EE and ER share – under settlement fund
- F. NMIRF Retirees EE and ER share – opt out retirees
- G. Component units EE and ER share

## Section 2.1 Enrollment

To enroll, employees are required to complete an Application Form and indicate any dependents they wish to include in their coverage. Any subsequent changes to enrollment must be made by submitting an Enrollment Change Form. Both forms are available at the GHLIP Office or other designated locations.

### **New Employees**

Newly hired employees must submit their application within 30 calendar days from their date of hire. Coverage will commence on the first day of the pay period following the approval of the application.

### **Current Employees**

Current employees may enroll or make changes to their coverage only during the designated Open Season, unless they have newly acquired dependents that qualify for mid-year changes.

### **Application Approval**

The Administrator reserves the right to reject any application due to ineligibility, the provision of false or misleading information, or other valid reasons as determined by applicable policies.

This enrollment process applies to all active employees and retirees.

### **Step 1:**

The subscriber will fill out and submit the GHLI Health Insurance Enrollment Form and CNMI Group Life Insurance Packet, refer to [Forms - Department of Finance - Commonwealth of the Northern Mariana Islands \(gov.mp\)](#) and submit it to the GHLI Team (ghli@dof.gov.mp).

### **Step 2:**

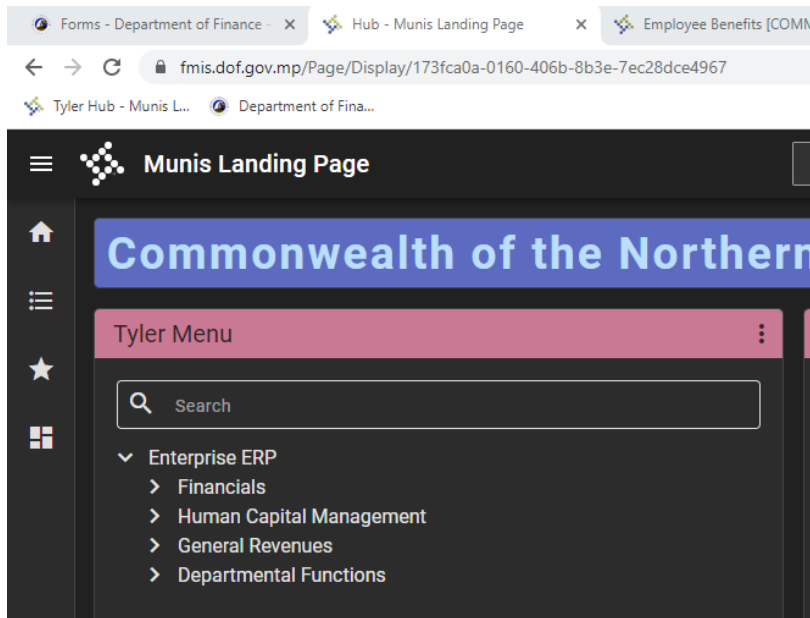
The GHLI Team will review and process the forms submitted by the subscriber. Then, submits to the GHLI Director for approval. Once approved by the GHLI Director, the GHLI team will update the active

employee's deduction code in the Munis system for CNMI Government employees and send out notification to other agencies. Only the GHLI Team can update the information in the deduction code in Munis related to Health and Life insurance.

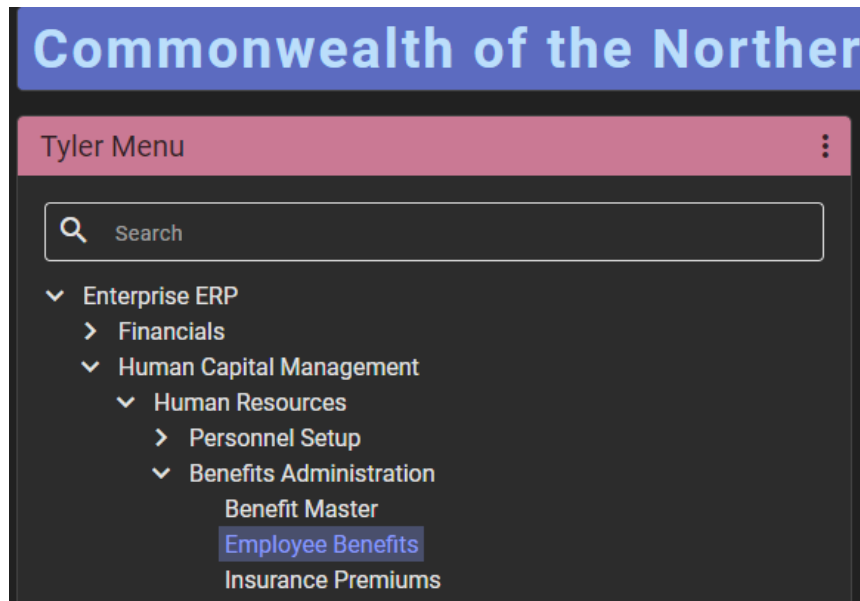
## Section 2.2 CNMI Government Employee and Employer Deductions

The following process is performed when updating the deduction code in the Munis system.

a. Open Tyler Munis



- b. Click on Human Capital Management
- c. Click on Human Resources
- d. Click on Benefits Administration
- e. Click on Employee Benefits



- f. Click on the Add button
- g. Type in the Employee number or the 3 dots to search for the employee
- h. Click on deduction
- i. Enter the Deduction code
  - a. 2000 – Health Insurance
  - b. 2200 – Life Basic
  - c. 8200-8230 – Dep Life Option 1-4

## GROUP HEALTH AND LIFE INSURANCE PROCEDURES

| Code | Deduction                 |
|------|---------------------------|
| 2000 | GOV SPONSOR HEALTH        |
| 2099 | WAIVED GOV SPONSOR HEALTH |
| 2100 | HEALTH ADJ CATCH UP       |
| 2150 | HEALTH ADJ REFUND         |
| 2200 | GOV SPONSORED LIFE        |
| 2250 | GOV LIFE INS ADJ          |
| 2500 | 401A                      |
| 2600 | 457 DEFERRED COMP AMT     |
| 2650 | 457 DEFERRED COMP PCT     |
| 7000 | RET CLASS 1               |
| 7005 | RET CLASS 2               |
| 8200 | DEP LIFE OPTION 1         |
| 8210 | DEP LIFE OPTION 2         |
| 8220 | DEP LIFE OPTION 3         |
| 8230 | DEP LIFE OPTION 4         |

- j. Insert the start date of the deduction
- k. Insert the enrollment date to match the start date
- l. For Health Insurance Carrier, select Aetna in the drop-down menu
- m. Select all applicable options from the drop down based on the coverage the employee signed up for.
- n. For Life Insurance and Life Insurance DepCO, continue to tab through and then click Accept.

Main
Other

Start Date \*

End Date \*

Calc Code \*

Factor \*

☒ Active

Enrollment Date

Coverage End Date

Employee Amt/Pct

Employee Ann Amt

Employer Amt/Pct

Employer Ann Amt

Health Insurance

Carrier

Plan

Coverage

Level

Monthly Premium

Employee Rate  Rate per cycle

Employer Rate  Rate per cycle

## Section 2.3 General Billing Invoice (GBI) Process

This process applies to CNMI Government, NMI Settlement Fund, and all Component Units

The Invoice Entry and Proof program is used to create invoices to bill customers for goods or services. When you create a bill, it initiates a receivable so that you can see how much money is owed to your funds at any one time.

Refer to the Process of Creating an AR Invoice for additional details and steps.

### Section 2.3.1 Active Employee (EE) and Employer (ER) Share

#### Step 1:

The vendor for the life insurance liability and health liabilities is GHLI. Once Treasury processed the payment to GHLI for the active employees EE and ER share, the GHLI team will enter the following cash receipt entries in Munis: **(ZA001-health; ZA002-life)**

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 9999.11431 GHLI cash account | xxx |     |
| Cr. 51170300.21610 Due to health |     | xxx |
| Cr. 51170300.21510 Due to life   |     | xxx |

#### Step 2:

For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, Secretary of Finance (SOF) Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | xxx |     |
| Dr. 51170300.21510 Due to life   | xxx |     |
| Cr. 9999.11431 GHLI cash account |     | xxx |

#### Step 3:

Treasury will process the payment for these invoices.

### Section 2.3.1 Settlement retirees EE and ER Share – NMI Settlement Fund

The Settlement Fund was created as a result of a Settlement Agreement reached in *Betty Johnson v. Eloy S. Inos, et al.*, Case No. 09-00023, which was approved by the U.S. District Court for the NMI. The Settlement Fund accepted certain assets of the NMI Retirement Fund and was established to ensure that Settlement Class Members receive at least 75% of their Full Benefits, as defined in the Settlement Agreement. The Settlement

Agreement requires the NMI Government to make annual payments to the Settlement Fund, which are necessary for the Settlement Fund to pay 75% of Class Members' Full Benefits.

See the [Full Final Judgment \(Civil Case NO. 09-00023\)](#) here.

### EE Share

#### Step 1:

On a bi-weekly basis, NMI Settlement Fund transfer payment to GHLI for the EE share of the opt-out retirees. GHLI team will enter the following cash receipt entries in Munis: **(ZA001-health; ZA002-life)**

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 9999.11431 GHLI cash account | xxx |     |
| Cr. 51170300.21610 Due to health |     | xxx |
| Cr. 51170300.21510 Due to life   |     | xxx |

#### Step 2:

For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, SOF Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | xxx |     |
| Dr. 51170300.21510 Due to life   | xxx |     |
| Cr. 9999.11431 GHLI cash account |     | xxx |

#### Step 3:

Treasury will process the payment for these invoices.

### ER Share

#### Step 1:

On a semi-monthly basis, NMI Settlement Fund submits the ER share calculation for the Settlement Fund retirees. The amount in the calculation will be used by the GHLI team as a basis for the amount to be paid to Aetna and IAC. The GHLI Team should process a memo to request CNMI Treasurer to pay the retirees' ER Share to GHLI bank account from General Fund bank account, which is approved and signed by Secretary of Finance.

**Step 2:**

Once the memo is approved, SOF Office will process an invoice entry to record the retirees' health and life insurance ER share (Vendor: GHLI).

|                                     |     |     |
|-------------------------------------|-----|-----|
| Dr. 11881700.62200 Health Insurance | xxx |     |
| Dr. 11881700.62210 Life Insurance   | xxx |     |
| Cr. 9999.10000 GF Bank account      |     | xxx |

**Step 3:**

Treasury will process the payment for these invoices.

**Step 4:**

Once Treasury processed the payment to GHLI for the retirees' ER share, the GHLI team will enter the following cash receipt entries in Munis: **(ZA001-health; ZA002-life)**

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 9999.11431 GHLI cash account | xxx |     |
| Cr. 51170300.21610 Due to health |     | xxx |
| Cr. 51170300.21510 Due to life   |     | xxx |

**Step 5:**

For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, SOF Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | xxx |     |
| Dr. 51170300.21510 Due to life   | xxx |     |
| Cr. 9999.11431 GHLI cash account |     | xxx |

**Step 6:**

Treasury will process the payment for these invoices.

### Section 2.3.2 NMIRF Retirees EE and ER share – opt-out retirees

NMIRF Retirees are retirees who opted out of the Settlement Fund class action lawsuit and are still under the original Northern Mariana Islands Retirement Fund.

#### Step 1:

On a semi-monthly basis, the NMIRF submit their payment of the health and life insurance to GHLI Team. Upon receipt of the payment from NMIRF, GHLI Team will enter the following cash receipts entries in MUNIS. **(ZA001-health; ZA002-life)**

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 9999.11431 GHLI cash account | xxx |     |
| Cr. 51170300.21610 Due to health |     | xxx |
| Cr. 51170300.21510 Due to life   |     | xxx |

#### Step 2:

For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, SOF Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | xxx |     |
| Dr. 51170300.21510 Due to life   | xxx |     |
| Cr. 9999.11431 GHLI cash account |     | xxx |

#### Step 3:

Treasury will process the payment for these invoices.

### Section 2.3.3 Component units EE and ER share

Component units as listed in the Appropriations and Budget Authority Act for each fiscal year.

#### Step 1:

On a bi-weekly basis, the component units submit their payment and calculation of the health and life insurance to GHLI Team. Upon receipt of the payment from the component units, GHLI Team will enter the following cash receipts entries in MUNIS. **(ZA001-health; ZA002-life)**

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 9999.11431 GHLI cash account | xxx |     |
| Cr. 51170300.21610 Due to health |     | xxx |
| Cr. 51170300.21510 Due to life   |     | xxx |

**Step 2:**

For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, SOF Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | XXX |     |
| Dr. 51170300.21510 Due to life   | XXX |     |
| Cr. 9999.11431 GHLI cash account |     | XXX |

**Step 3:**

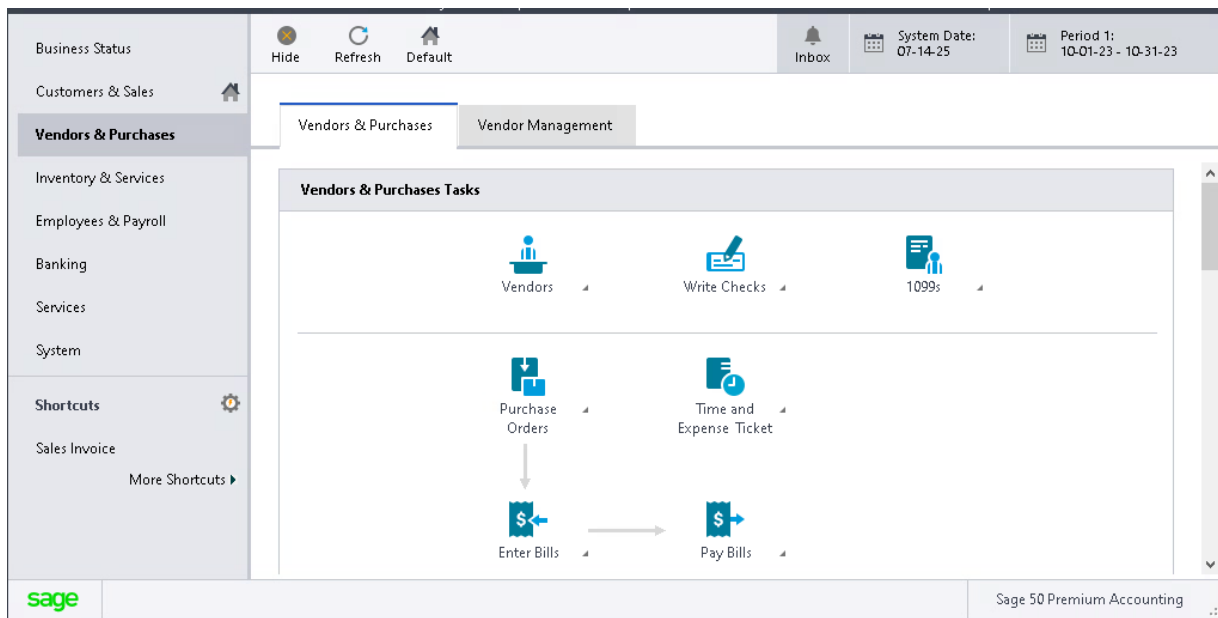
Treasury will process the payment for these invoices.

## Section 3: VENDOR PAYMENT

Vendor payments are made to the health and life insurance carriers for GHLI. Currently GHLI has one health and one life insurance carrier. Carriers are selected through the RFP process.

**Process**

1. Open PeachTree
2. Click on Vendor & Purchases



### 3. Click on Pay Bills

4. Click on the magnifying glass to find the vendor
5. Fill out the check/reference no – This should be the memo number
6. Date – Today's date
7. Click on the payments to be paid
8. Click on print
9. Click on save
10. Open Memo List – <S:\Memo's\Memo List 2025.xlsx>

| Memo Number | Subject             | Date      | Check No | Check Amount    | Comments              |
|-------------|---------------------|-----------|----------|-----------------|-----------------------|
| 2020-071    | Request for Payment | 2/25/2020 |          | \$ 14.00        | OPT OUT REIMBURSEMENT |
| 2020-072    | Request for Payment | 2/27/2020 |          | \$ 1,150,892.96 | AETNA PAYMENT         |
| 2020-073    |                     |           |          |                 |                       |
| 2020-074    |                     |           |          |                 |                       |

11. On the next available Memo Number
  - a. Subject – What is the request
  - b. Date – Today's Date
  - c. Payee – Vendor Name
  - d. Check Amount – The amount of the memo being requested

- e. Comments – Who the payment is to and for what
- f. Save the spreadsheet
- 12. Open the Template for the Memo to be processed (make sure the template is on GHLI Letterhead) - [..\Templates](#)
- 13. Fill out the Memo
  - a. Date – Today’s Date
  - b. NMIRF Memo No.
  - c. To - Director of Financial Services, CNMI Treasurer
  - d. From – Secretary of Finance
  - e. Prepared By – Name of Employee preparing the Memo
  - f. Approved by - Director
  - g. Subject – What is the request
  - h. Payee – Vendor Name
  - i. Account No. – MUNIS Account the payment is to be paid out of, bank account number, name of bank account
  - j. Expense Account – Expense Account to be charged
  - k. Check Amount – The amount of the memo being requested
  - l. Comments – Who the payment is to and for what
- 14. Print Memo
- 15. Give to Director for review and signature
- 16. Transmit Memo to Secretary of Finance for signature
- 17. Scan Signed memo
- 18. Link Scanned Memo to Memo Listing
- 19. Enter Invoice to MUNIS – Follow AP Invoice Entry Procedures (Please refer to our AP process up to payment. Please refer to the Accounts Payable Invoice Entry Process available on the CNMI website.
- 20. For the payment to Aetna and IAC, GHLI Team will prepare an invoice memo approved and signed by the Secretary of Finance. Then, GHLI team will process **invoice entry** for the payment to these vendors. Since GHLI Team do not have access to process invoices using liability account, SOF Office can assist GHLI Team with the invoice entry process.

|                                  |     |     |
|----------------------------------|-----|-----|
| Dr. 51170300.21610 Due to health | xxx |     |
| Dr. 51170300.21510 Due to life   | xxx |     |
| Cr. 9999.11431 GHLI cash account |     | xxx |

## Section 4: RETENTION POLICY

The Group Health and Life Insurance Trust Fund (GHLI) Document Retention Policy establishes clear guidelines for the proper handling, storage, and disposal of GHLI records. The purpose of this policy is to ensure compliance with legal, regulatory, and operational requirements, safeguard sensitive information, and minimize unnecessary storage.

This policy applies to all GHLI records, whether in paper or electronic format.

### 1. Retention Period

- All official business documents, including but not limited to contracts, financial records, correspondence, personnel files, and reports, must be retained for a minimum of **seven (7) years** from the date of creation or final action, unless otherwise required by applicable laws or regulations.

### 2. Scanning and Storage

- Paper documents must be scanned and converted into electronic format within a reasonable timeframe after receipt or creation.
- Scanned documents must be stored in a secure electronic filing system with appropriate access controls, backup, and disaster recovery measures.

### 3. Shredding of Paper Records

- Once a document has been successfully scanned and verified, the original paper copy must be securely shredded to prevent unauthorized access or misuse.
- Shredding must be performed using cross-cut or micro-cut shredders, or through an approved third-party shredding service.

### 4. Disposal of Records After Retention

- At the end of the seven (7) year retention period, documents must be securely deleted or destroyed, unless subject to a legal hold, audit, or ongoing investigation.
- Electronic files must be permanently deleted to ensure they cannot be reconstructed or recovered.

### 5. Legal Holds

- If a document is relevant to ongoing litigation, investigation, or audit, it must not be destroyed—even if the retention period has expired—until the hold is formally lifted.

### 6. Responsibilities

- Employees are responsible for adhering to this policy when handling GHLI records.

- Managers and department heads are accountable for ensuring compliance within their respective teams.
- The Records Administrator (or designated compliance officer) is responsible for policy oversight, monitoring adherence, and conducting periodic audits of retention practices.

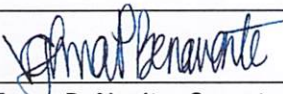
### **Enforcement**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, and may carry legal consequences.

## Section 5: REVISION/VERSION HISTORY

\*This GHLI procedure will be periodically reviewed and updated to reflect changes in regulations or organizational requirements.

### Revision History

|                     |                                                                                   |
|---------------------|-----------------------------------------------------------------------------------|
| Originator:         | Department of Finance, Office of the Secretary                                    |
| Effective Date:     | October 1, 2025                                                                   |
| Reviewed By:        | Velma P. Benavente, NMIRF & GHLI Director                                         |
| Reviewer Signature: |  |
| Approved By:        | Tracy B. Norita, Secretary of Finance                                             |
| Approval Signature: |  |
| Procedure Purpose:  | To document and standardize the GHLI processes for the CNMI Government.           |

### Version History:

| Version Number     | Version Date    | Description of Change  | Point of Contact  |
|--------------------|-----------------|------------------------|-------------------|
| <i>Version 1.0</i> | <i>10/01/25</i> | <i>Initial release</i> | <i>SOF Office</i> |
|                    |                 |                        |                   |
|                    |                 |                        |                   |