



# ANNUAL PHA PLAN

Fiscal Year Beginning 10/1/2023

Submission to the U.S. Department of Housing and Urban Development Office of Public and Indian Housing



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<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>						
<p><b>Purpose.</b> The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.</p> <p><b>Applicability.</b> The Form HUD-50075-ST is to be completed annually by <b>STANDARD PHAs or TROUBLED PHAs</b>. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA <u>do not</u> need to submit this form.</p> <p><b>Definitions.</b></p> <ol style="list-style-type: none"> <li>(1) <b>High-Performer PHA</b> – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.</li> <li>(2) <b>Small PHA</b> - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.</li> <li>(3) <b>Housing Choice Voucher (HCV) Only PHA</b> - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.</li> <li>(4) <b>Standard PHA</b> - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.</li> <li>(5) <b>Troubled PHA</b> - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.</li> <li>(6) <b>Qualified PHA</b> - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.</li> </ol>								
<b>A.</b>	<b>PHA Information.</b>							
A.1	<p> <b>PHA Name:</b> <u>HOUSING AUTHORITY OF NEW ORLEANS</u>      <b>PHA Code:</b> <u>LA001</u>  <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA      <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>10/1/2023</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>*Number of Public Housing (PH) Units</b> <u>2,208</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>18,280</u>  <b>Total Combined Units/Vouchers</b> <u>20,488</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission </p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><b>HANO's draft plans and policy revisions are posted on the following platforms</b></p> <ul style="list-style-type: none"> <li>• Agency's website at <a href="http://www.hano.org">www.hano.org</a></li> <li>• HANO Facebook page at <a href="https://www.facebook.com/HANOHOUSING">https://www.facebook.com/HANOHOUSING</a></li> <li>• HANO Facebook page at <a href="https://www.twitter.com/HANOHOUSING">https://www.twitter.com/HANOHOUSING</a></li> <li>• HANO Constant Contact Email Group of Stakeholders</li> <li>• HANO Central Offices: 4100 Touro St. &amp; 2051 Senate St., New Orleans, LA 70122</li> <li>• Housing Communities: <ul style="list-style-type: none"> <li>○ Bienville Basin – 215 Treme St. &amp; 1201 Bienville St., New Orleans, LA 70112</li> <li>○ City Square – 1501 Saint Louis 70112</li> <li>○ Columbia Parc – 1400 Milton St. &amp; 1401 Caton St., New Orleans, LA 70122</li> <li>○ Faubourg Lafitte – 2200 Lafitte St. &amp; 700 N. Galvez St., New Orleans, LA 70119</li> <li>○ Fischer – 1915 L. B. Landry St., New Orleans, LA 70114</li> <li>○ New Florida – 2521 Independence St., New Orleans, LA 70117</li> <li>○ Guste – 1301 Simon Bolivar Ave., New Orleans, LA 70113</li> <li>○ Harmony Oaks – 3320 Clara St., New Orleans, LA 70115</li> <li>○ Marrero Commons – 3353 Martin Luther King Jr. Blvd., New Orleans, LA 70125</li> <li>○ River Garden – 913 Felicity St. &amp; 530 St. Andrew St., Ste. D, New Orleans, LA 70130</li> <li>○ The Estates – 3450 Desire Pkwy., New Orleans, LA 70126</li> </ul> </li> </ul> <p><b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th style="width: 33%;">Participating PHAs</th> <th style="width: 33%;">PHA Code</th> <th style="width: 33%;">Program(s) in the Consortia</th> </tr> </thead> <tbody> <tr> <td style="height: 30px; vertical-align: top;">Lead PHA:</td> <td></td> <td></td> </tr> </tbody> </table>		Participating PHAs	PHA Code	Program(s) in the Consortia	Lead PHA:		
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<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <table> <tr> <td style="text-align: center;">Y</td> <td style="text-align: center;">N</td> <td></td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Statement of Housing Needs and Strategy for Addressing Housing Needs</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Financial Resources.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Rent Determination.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Operation and Management.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Grievance Procedures.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Homeownership Programs.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Community Service and Self-Sufficiency Programs.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Safety and Crime Prevention.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Pet Policy.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Asset Management.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Substantial Deviation.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Significant Amendment/Modification</td> </tr> </table>	Y	N		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Statement of Housing Needs and Strategy for Addressing Housing Needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Financial Resources.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Rent Determination.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operation and Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Grievance Procedures.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Homeownership Programs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Community Service and Self-Sufficiency Programs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Safety and Crime Prevention.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pet Policy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Asset Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification
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<b>B.1</b>	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): <b>Revised elements are captured below.</b>																																										

**Statement of Housing Needs and Strategy for Addressing Housing Needs**

In the upcoming fiscal year, HANO will implement a variety of strategies to address the shortage of affordable housing that has increased due to the COVID-19 pandemic and Hurricane Ida. The shortage is reflected in the below waiting list statistics and Statement of Housing Needs. HANO's strategies emanate from the Agency's 5-Year Plan goals and objectives and are aligned with HUD's strategic framework. They are also consistent with the City of New Orleans' Consolidated Plan and link to many of the broader community strategies currently underway.

Core strategies include: maximizing affordable housing opportunities through continuous program improvements and management efficiencies including upgrading technology and streamlining business operations; leveraging additional resources to replace public housing units and implementing mixed-finance, mixed-income redevelopment; and generating new housing opportunities by applying for additional vouchers should they become available – including special purpose vouchers for targeted groups such as the elderly, disabled, veterans, and the homeless.



## STATEMENT OF HOUSING NEEDS

### HOUSING AUTHORITY OF NEW ORLEANS HOUSING NEEDS STATEMENT: FYB 10/1/2022 PHA ANNUAL PLAN

#### HUD 2021 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS) USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2014-2018 CHAS DATASETS

<b>Total Orleans Parish Households</b>	<b>153,820</b>	Population slightly decreased from 154,035 to 153,820.
<b>Owner Households</b>	<b>74,240 (48% of Total)</b>	The number of homeowners increased from 73,035 to 74,240.
<b>Renter Households</b>	<b>79,580 (52% of Total)</b>	The number of renters decreased from 81,000 to 79,580.
<b>Orleans Parish Renter Households by Average Median Income (AMI) With Breakout of "Low Income Renter" Households</b>		<b>Statistical Notations</b>
<b>Extremely Low-Income</b> renter households (<=30% AMI)	28,750	Extreme Low-income population increased from 26,310 to 28,750.
<b>Very Low-Income</b> renter households (>30% but <=50% AMI)	13,695	Very Low-Income population increased from 12, 985 to 13,695.
<b>Low-Income</b> renter households (>50% but <=80% AMI)	<u>12,110</u>	The Low Income population decreased from 13,475 to 12,110
<b>Subtotal Low-Income Renter Households (&lt;=80% AMI)</b>	<b>54,555</b>	Of the total 79,580 Renter Households in Orleans Parish, 54,555 or 69% are classified as Low-Income Renter Households. Households. This is a 4% increase from last year's low-income renter households.
Other renter households (>80% but <=100% AMI)	6,105	
Other renter households (>100% AMI)	<u>18,920</u>	
<b>Subtotal Other Renter Households (&gt;80% AMI)</b>	<b>25,020</b>	
<b>Total Renter Households:</b>	<b>79,580</b>	
Low-income renter households who are <b>cost burden</b>	<b>39,230</b>	Of all 54,555 Low-Income Renter Households, 39,230 or 72% are Cost Burdened.
Low-income renter households with <b>housing problems</b>	<b>39,960</b>	Of all 54,555 Low-Income Renter Households, 39,960 or 73% have Housing Problems (decrease by 3% from last year).
<b>COST BURDEN:</b> Moderate cost burden is "rent comprising more than 30 percent of income". Severe cost burden is "rent comprising more than 50 percent of income".		
<b>HOUSING PROBLEMS:</b> A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS data: 1) housing units lacks complete kitchen facilities; 2) housing units lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.		

## Section 8 Tenant- Based Assistance Waiting Lists

Housing Needs of Families on the Housing Choice Voice Waiting List		
<b>Waiting list type:</b> <i>Section 8 tenant-based assistance (2022 Waiting List)</i>		
	# of families	% of total families
Waiting list total***	10,571	
Extremely low income <=30% AMI	7,379	69.80%
Very low income (>30% but <=50% AMI)	1,785	16.89%
Low income (>50% but <80% AMI)	1,039	9.83%
Over income (>80% AMI)	368	3.48%
Families with children	4,565	43.18%
Elderly families	269	2.54%
Families with Disabilities**	1,668	15.78%
Race/ethnicity – African American	9,848	93.16%
Race/ethnicity – White	466	4.41%
Race/ethnicity – American Indian	28	0.26%
Race/ethnicity –Hispanic	349	2.20%
Race/ethnicity – Asian	8	0.08%
Race/ethnicity – Native Hawaiian/Other Pacific Islander	8	0.08%
Race/ethnicity – None Listed	95	0.90%
Characteristics by Bedroom Size*		
No BR Selected	98	0.93%
1BR	5,452	51.58%
2 BR	3,057	28.92%
3 BR	1,484	14.04%
4 BR	392	3.71%
5 BR	72	0.68%
5+ BR	16	0.15%
*Bedroom size is the size that is requested by the applicant but has not been determined by HANO/HUD occupancy standards.		
**The disability count was based on applicants' self-reporting of disability status.		

## Public Housing Waiting Lists

Housing Needs of Families on the Public Housing Waiting List		
	# of families	% of total families
Waiting list total*	23,571	100%
Extremely low income	19,328	82%
Very low income (>30% but <=50% AMI)	3,535	15%
Low income (>50% but <80% AMI)	472	2%
Over income (>80% AMI)	236	1%
Families with children	20,507	87%
Elderly families	2,357	10%
Families with Disabilities**	707	3%
Race/ethnicity – African American	20,978	89%
Race/ethnicity - White	943	4%
Race/ethnicity – American Indian	236	1%
Race/ethnicity –Hispanic	472	<2%
Race/ethnicity –Asian	40	<1%
Race/ethnicity – Native Hawaiian / Other Pacific Islander	20	<1%
Race/ethnicity – None Listed	882	4%
<b>Characteristics by Bedroom Size (Public Housing Only)</b>		
1BR	10,371	44%
2 BR	6,364	27%
3 BR	3,771	16%
4 BR	2,121	9%
5 BR	708	3%
5+ BR	236	1%
<p>*Some families may appear on multiple Public Housing site-based wait lists. The overall number of families on all Public Housing site-based wait lists is 23,571. For purposes of this analysis, applicants who were on multiple Public Housing site wait lists are counted only once in the above statistics to avoid skewing the characteristics of the wait list population.</p> <p>**The disability count may be underreported based on applicants' self-reporting of their disability status.</p>		

## Strategies for Addressing Disparities in Housing Needs

### Assessment of Fair Housing (AFH) Plan

The City of New Orleans (City) and the Housing Authority of New Orleans (HANO) collaborated to produce a joint Assessment of Fair Housing (AFH) Plan designed to provide meaningful goals and strategies that can be reasonably expected to achieve a material positive change in disparities in housing needs and in access to opportunity; replacing segregated living patterns with truly integrated and balanced living patterns; transforming racially or ethnically concentrated areas of poverty into areas of opportunity; and fostering and maintaining compliance with civil rights and fair housing laws.

To address these barriers, the AFH Plan proposes to:

1. Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.
2. Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.
3. Ensure that internal policies and practices advance access and mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.
4. Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.
5. Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.
6. Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.
7. Provide reliable, frequent, and affordable access to multiple transportation options to transit-dependent populations.

These goals were jointly embraced by the City of New Orleans and HANO and incorporated into the AFH Plan which was approved by HUD on November 17, 2016. HANO has continued to implement and make progress toward these goals.

## Statement of Financial Resources

Anticipate Financial Resources for FYB Oct. 1, 2023			
Planned Sources and Uses			
		Planned \$	Planned Uses
<b>1</b>	<b>Federal Grants</b>		
	Public Housing Operating Fund	\$9,093,880	
	Capital Fund Program	\$10,000,000	
	Replacement Housing Factor Funding	\$0	
	Annual Contributions for Tenant-Based Assistance (HCV HAP)	\$178,416,847	
	Annual Contributions for Tenant Based Vouchers all Administrative Fees	\$13,552,625	
	FEMA	\$3,000,000	
<b>2</b>	<b>Prior Year Federal Grants (unobligated funds only)</b>		
	Capital Funds (CFP & RHF)	\$19,700,522	
	CNI	\$0	
	Hope VI	\$0	
	901 funds	\$0	
<b>3</b>	<b>Public Housing Dwelling Rental Income</b>		
	Tenant Rental Revenue	\$703,390	
<b>4</b>	<b>Other Income (list below)</b>		
	Interest Income	\$28,000	
	State and Local	\$0	
	Misc. Income	\$1,022,500	
	<b>Total sources</b>	<b>\$235,517,764</b>	

## **Operation and Management**

Following is a summary of policy changes proposed to facilitate the operation and management of HANO's programs. These policy changes are contained in draft redline copies of HANO's Housing Choice Voucher Program (HCV) Administrative Plan. There is one policy change for the Public Housing (PH) Admissions and Continued Occupancy Policy (ACOP). Both documents are available on the Agency's website at [www.hano.org](http://www.hano.org).

### **HCV Administrative Plan Policy Changes**

HANO has revised the HCVP Administrative Plan for fiscal year beginning October 1, 2023. Items that were revised were:

- Changed the definition of "absent family member" from 90 days to 180 days or more for permanent and 180 days or less for temporary absence.
- Removed requirement for families to submit a new, written request for a live-in aide at each annual reexamination.
- Removed Disaster Preference
- Clarified exceptions to bedroom size leasing.
- Changed utility allowances to be paid upon the effective date of certification instead of date of lease.
- Expanded options to complete recertifications including virtual and by telephone.
- Revised criteria for HCV terminations due to criminal activity of a family member, including juvenile family member.

### **Public Housing Admissions and Continued Occupancy Plan (ACOP) Policy Changes**

HANO has revised the Admissions and Continued Occupancy Plan (ACOP) to make the more in line with the HCV Administrative Plan. HANO has included new policy information mandated by HUD in response to the Housing Opportunity Through Modernization (HOTMA) act that specifies that over-income tenants cannot participate in the Resident Advisory Councils. All other changes are rearrangement of sections or grammar to make the document more user friendly.

## **DEFINITION OF “SUBSTANTIAL DEVIATION” AND “SIGNIFICANT AMENDMENT OR MODIFICATION”**

In accordance with HUD regulations in 24 CFR 903.7 (r) and 24 CFR 905.3, HANO has defined below the basic criteria that will be used for determining: (i) substantial deviation from its 5-Year Plan; (ii) significant amendment or modification to the 5-Year and Annual PHA Plans; and (iii) significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan. Prior to implementing changes that meet such criteria, HANO will submit for HUD’s approval, a revised Plan(s) that meets full public process requirements including Resident Advisory Board review and consultation.

HANO’s criteria, as defined below, is applicable to all CFP components including: Capital Fund grants; Replacement Housing Factor (RHF) grants; Disaster Grants; Capital Fund Financing Program (CFFP) allocations; as well as any new or future formula components such as Demolition and Disposition Transitional Funding (DDTF).

### **(i) Criteria for defining “Substantial Deviation” from the 5-Year Plan:**

- A major change in the direction of HANO pertaining to its mission and goals would constitute a “substantial deviation” from the Agency’s 5-Year Plan.
- Examples include the undertaking of new program activities, development strategies, or financing initiatives that do not otherwise further HANO’s stated mission and goals as articulated in the 5-Year Plan.

### **(ii) Criteria for defining “Significant Amendment or Modification” to the 5-Year and Annual PHA Plans:**

- Changes to rent, admission policies, or organization of the waiting list(s) in the Public Housing Program that will impact more than 10% of applicants and/or households assisted under the Program.
- Changes to rent, admission policies, or organization of the waiting list(s) in the Housing Choice Voucher Program that will impact more than 10% of applicants and/or households assisted under the Program.
- Substantial changes to demolition, disposition, designated housing, homeownership, or conversion activities identified in the current HUD-approved Annual or 5-Year Plans.

### **(iii) Criteria for defining “Significant Amendment or Modification” to the Capital Fund Program (CFP) 5-Year Action Plan:**

- Proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance proposals will be considered significant amendments to the CFP 5-Year Action Plan.
- Additions of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceed \$3 million.

### **(iv) Exceptions:**

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification.

- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.

<b>B.1 (c) The PHA must submit its Deconcentration Policy for Field Office review.</b>
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## **DECONCENTRATION OF POVERTY AND INCOME-MIXING**

HANO's admission policy is designed to provide for deconcentration of poverty and income mixing by bringing higher income residents into lower income developments and lower income residents into higher income developments. Nothing in the deconcentration policy relieves HANO of the obligation to meet the income-targeting requirement. Gross annual income is used for income limits at admission and for income-mixing purposes.

### **Deconcentration and Income-Mixing Goals**

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

HANO acknowledges that its Signature Communities are mixed-income or mixed-finance developments that include policies intended to promote income mixing in public housing, increase incomes of public housing residents, or the income mix is otherwise subject to individual review and approval by HUD through mixed-finance review or other approval processes. As such, the incomes of public housing residents may fall outside the Established Income Range (as defined below). In such an event, HANO will provide appropriate explanation of such an occurrence in its Annual Plan.

HANO's deconcentration and income-mixing goal, in conjunction with the requirement to target at least 40 percent of new admissions to public housing in each fiscal year to "extremely low-income families", will be to admit families above HANO's Established Income Range (EIR) to communities below the EIR, and families below HANO's EIR to communities above the EIR.

Deconcentration applies to transfer families as well as applicant families.

### **Step for Implementation**

Step 1. Annually, HANO will determine the average income of all families residing in general covered developments.

Step 2. HANO will then determine the average income of all families residing in each covered development.

Step 3. HANO will then determine whether each covered development determined in Step 2 falls above, within or below the Established Income Range (EIR).

The EIR is 85 percent to 115 percent (inclusive of 85 percent and 115 percent) of the average family income for covered developments determined in Step 1.



Step 4. HANO will then determine whether communities outside EIR are consistent with local goals and strategies in the Housing Authority Plan. Any deconcentration policy as needed is described in the Agency Plan.

Step 5. If at annual review there are found to be covered developments with average incomes above or below the EIR that are not explained or justified in the Agency Plan, HANO shall list these covered developments in its Annual Plan.

The Housing Authority shall adhere to the following policies for deconcentration of poverty and income mixing in applicable communities:

- HANO shall establish a preference for admission of working families in covered communities below the EIR.
- HANO shall target investment and capital improvements toward covered communities below the EIR to encourage applicant families whose income is above the EIR to accept units in those communities.
- A family has the sole discretion whether to accept an offer of a unit made under HANO's deconcentration policy. HANO and its Agents will not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under this deconcentration policy.

### **Deconcentration Compliance**

If, at annual review, the average incomes at all covered communities are within the Established Income Range, HANO will be considered to be in compliance with the deconcentration requirement.

#### **B.2 New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Hope VI or Choice Neighborhoods.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Mixed Finance Modernization or Development.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Demolition and/or Disposition.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Conversion of Public Housing to Project-Based Assistance under RAD.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Police Officers ( <i>Demonstration Program at Guste Homes only</i> ).                                     |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Non-Smoking Policies.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Project-Based Vouchers.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Units with Approved Vacancies for Modernization.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

## Hope VI or Choice Neighborhoods

HANO applied for and received a CNI planning grant for the BW Cooper housing community. Once a Transformation Plan is developed, HANO will consider seeking a CNI implementation grant for BW Cooper/Marrero Commons.

## Mixed Finance Modernization or Development

☒ Yes ☐ No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?

If yes, list developments or activities below:

***B.W. Cooper Phase 2, Florida Phase 2, Iberville Choice Neighborhoods Initiative – City Square Phase 2, Faubourg Lafitte, and Fischer, 1141 Esplanade Avenue***

## Demolition and/or Disposition

1. ☒ Yes ☐ No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year?

Demolition/Disposition Activity Description Bywater/Marigny					
Activity type: Demolition      Disposition      (Scattered Sites)					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001025	4200 Royal; 2522 N Rampart	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
	2818 Burgundy; 2819 Dauphine; 710 Clouet	3/11/2010			
LA001036	1740-42-44-46 Poland; 1830-32-34-36 Poland	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
LA001044	600 France; 601 Mazant; 608 France; 611 Mazant; 616 France; 620 France; 621 Mazant; 631 Mazant; 641 Mazant; 644 France; 651 Mazant	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
Demolition/Disposition Activity Description Iberville Choice Neighborhoods Initiative (CNI) Trapezoid					
Activity type: Demolition      Disposition      (Scattered Sites)					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001025	1814 Bayou Rd; 1818 Bayou Rd; 2427 Ursulines; 2115-17 St Ann	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
Demolition/Disposition Activity Description Westbank					
Activity type: Demolition      Disposition      (Scattered Sites)					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001020	1500-06 Hendee; 1508-14 Hendee; 1524-30 Hendee; 1532-38 Hendee; 1814-20 Lawrence; 1815-21 Ptolemy	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
LA001025	717 DeArmas	8/12/2014	0 - vacant lot	Part of development	FY2019-2024

**Demolition/Disposition Activity Description  
Westbank**

**Activity type: Demolition**      **Disposition** ☒ **(Scattered Sites)**

LA # or AMP #	Development Name/Address	Application Status: Planned Submittal	Units Affected	Coverage of Action	Projected Timeline
LA001030	Christopher Park: 3100 Vespasian; 3102 Vespasian; 3104 Vespasian; 3106 Vespasian; 3108 Vespasian; 3110 Vespasian; 3112 Vespasian; 3114 Vespasian; 3114 Caladium 3115 Caladium; 3116 Caladium; 3117 Caladium; 3118 Caladium; 3119 Caladium; 3120 Caladium; 3121 Caladium; 2110 Murl; 2003 Murl	8/1/2020	0 - vacant lot	Part of development	FY2019-2024

**Demolition/Disposition Activity Description  
West Carrollton**

**Activity type: Demolition**      **Disposition** ☒ **(Scattered Sites)**

LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001019	8718-20 Willow; 1738-40 Gen Ogden; 1715 Cambronne; 1723 Cambronne; 1727 Cambronne; 1735 Cambronne	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
	1324-26 Eagle; 1925 Monroe; 1433-39 Gen Ogden; 9031 Cohn; 8729 Plum	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
LA001025	1400 Gen Ogden; 1408 Gen Ogden; 1416 Gen Ogden; 1424 Gen Ogden; 1432 Gen Ogden; 1440 Gen Ogden; 8516 Cohn; 8520 Zimple; 8811 Hickory; 1915 Leonidas; 8725-27 Plum; 8951 Birch	3/11/2010	0 - vacant lot	Part of development	FY 2019-2024

**Demolition/Disposition Activity Description  
Uptown**

**Activity type: Demolition**      **Disposition** ☒ **(Scattered Sites)**

LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001019	400 Dufossat	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
LA001025	2118-20-22 Danneel	8/12/2014	0 - vacant lot	Part of	FY2019-2024
	1000 Melpomene; 1008 Melpomene; 1016 Melpomene; 1231 Constance; 1120 Thalia	1/6/2011	0 - vacant lot	Part of development	FY2019-2024
	1421-23-25 Constance; 2331-33 Annunciation; 5312 Constance; 3249 Tchoupitoulas; 410 Pleasant	8/12/2014	0 - vacant lot	Part of development	FY2019-2024

	3250 St Thomas; 2400 St Thomas; 2411 St Thomas; 2417-19 St Thomas; 428 7th; 518 Cadiz; 930 7th	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
<b>LA001027</b>	2256 Baronne	1/6/2011	0 - vacant lot	Part of development	FY2019-2024
<b>LA001049</b>	3644 Annunciation; 3664 Annunciation; 735 Amelia	2/6/2002	0 - vacant lot	Part of development	FY2019-2024
<b>LA001051</b>	2901-03-05-07 Dryades	1/6/2011	0 - vacant lot	Part of development	FY2019-2024
<b>LA001052</b>	220-22 Eleonore	3/11/2010	0 - vacant lot	Part of development	FY2019-2024

**Demolition/Disposition Activity Description  
Upper Ninth/St. Roch/St. Claude**

<b>Activity type: Demolition      Disposition      (Scattered Sites)</b>					
<b>LA# or AMP#</b>	<b>Development Name/Address</b>	<b>Application Status: Approved</b>	<b>Units Affected</b>	<b>Coverage of Action</b>	<b>Projected Timeline</b>
<b>LA001025</b>	3749-55 Apache; 1915-17 Feliciana; 1615 Port; 1319 Montegut; 1927-29 Mandeville	3/11/2010	0 - vacant lot	Part of Development	FY2022-2024
		8/12/2014			
<b>LA001051</b>	3013-15 Mandeville	1/6/2011	0 - vacant lot	Part of development	FY2022-2024
<b>LA001021</b>	2123-25-27 Painters; 2129-31-33 Painters	8/12/2014	0 - vacant lot	Part of development	FY2022-2024

**Demolition/Disposition Activity Description  
New Orleans East**

<b>Activity type: Demolition      Disposition      (Scattered Sites)</b>					
<b>LA # or AMP #</b>	<b>Development Name/Address</b>	<b>Application Status: Approved</b>	<b>Units Affected</b>	<b>Coverage of Action</b>	<b>Projected Timeline</b>
<b>LA001025</b>	6601-03-05-07 Old Gentilly Rd; 6609-11-13-15 Old Gentilly Rd; 6617-19-21-23 Old Gentilly Rd; 6641-43-45-47 Old Gentilly Rd; 6649-51-53-55 Old Gentilly Rd; 6630-32-34-36 Chef Menteur; 6638-40-42-44 Chef Menteur; 6646-48-50-52 Chef Menteur; 6654-56-58-60 Chef Menteur; 6662-64-66-68 Chef Menteur; 6670-72-74-76 Chef Menteur; 6678-80-82-84 Chef Menteur; 6686-88-90-92 Chef Menteur	3/11/2010	0 - vacant lot	Part of development	FY2022-2026

Demolition/Disposition Activity Description B.W. Cooper					
Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001007303	B.W. Cooper	9/21/2007	0 - vacant lot	Part of development	FY2020-2025

Demolition/Disposition Activity Description Desire					
Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001014	Desire	12/29/2000	0 - vacant lot	Part of development	FY2022-2026

Demolition/Disposition Activity Description Fischer					
Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001016	Fischer	11/24/2004	0 - vacant lot	Part of development	FY2023-2026

Demolition/Disposition Activity Description Florida					
Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>					
LA # or AMP #	Development Name/Address	Application Status: Planned	Units Affected	Coverage of Action	Projected Timeline
LA001004 and LA0010011	Florida	12/1/2022	0 - vacant lot	Part of development	FY2019-2025

Demolition/Disposition Activity Description Lower Ninth Ward & Seventh Ward					
Activity type: Demolition      Disposition <input checked="" type="checkbox"/> (Scattered Sites)					
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001018	2601-03 Delery; 2609-11 Delery; 2615-17 Delery; 2621-23 Delery; 2627-29 Delery; 2635- 37 Delery; 2641-43 Delery; 2600-02 Dubreuil;	3/11/2010	0 - vacant lot	Part of development	FY2019-2024

	2608-10 Dubreuil; 2614-16 Dubreuil; 2620-22 Dubreuil; 2626-28 Dubreuil; 2634-36 Dubreuil; <input type="checkbox"/> 2640-42 Dubreuil; 6421-23 Law; 6420-22 Florida				
<b>LA001019</b>	1329-31 Charbonnet; 1342-44 Alabo; 1501-03 Benton; 1505-07 Benton; 1509-11 Benton; 1513-15 Benton; 6000-02 N Robertson; 6112- 14 N Robertson; 6116-18 N Robertson; 6301-03 N Robertson; 6309-11 N Robertson; 6317-19 N Robertson; 6318- 20 N Villere; 5520-22-24-26 Urquhart; 1301-03 Gordon; 1340 Gordon; 1424 Gordon; 1514-16 Gordon; 1514-16 Gordon; 1531-33 Gordon; 1300-02 Tupelo; 1415- 17 Tupelo	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
<b>LA001025</b>	1016-18-20 Tennessee; 1022-24-26 Tennessee; 1028-30-32 Tennessee; 1034-36-38 Tennessee; 4827 N Rampart; 1111-13-15-17 Reynes; 5400 N Villere; 5400 N Villere; 2405 Charbonnet; 1227-29-31 Alabo; 1233-35- 37 Alabo; 1239-45 Alabo; 1800-02 Gordon; 1804-06 Gordon; 1808-10 Gordon; 1511-17 Egan; 1530 Gordon; 1751-53 Tupelo; 2023 N Robertson 1916-18 N Roman	3/11/2010  8/12/2014	0 - vacant lot	Part of development	FY2019-2024
<b>LA001036</b>	4811 Marais; 4815 Marais	3/11/2010	0 - vacant lot	Part of development	FY2019-2024

### **Designated Housing for Elderly and Disabled Families.**

1. ☒ Yes ☐ No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year?

Following is a summary of HANO's current Designated Housing Plan that was requested for renewal in 2021:

Development Name	Development Number	Bedroom Type			Total Units Designated as Elderly (Pct. of Total Units in the Development)	Total Units in the Development
		0-BR	1-BR	2-BR		
Guste High Rise	LA001015301	0	358	11	369 (96%)	385
Fischer Senior Village	LA001062101	0	91	9	100 (100%)	100
Columbia Parc (Heritage)	LA001008710	0	33	3	36 (100%)	36
Faubourg Lafitte	LA001005711	0	30	0	30 (100%)	30
Total			512	23	535	551
Total Units in HANO's Public Housing Inventory						2,174

### **Project-Based Vouchers**

Pursuant to initial guidance published by HUD regarding the Section 8 Project-Based Voucher (PBV) Program in the January 16, 2001 Federal Register, Volume 66, Number 10, the Housing Authority of New Orleans intends to continue to operate a PBV Program as authorized by HUD and in conformity with all nondiscriminatory requirements specified in the PHA Plan regulations and further declares that the HANO shall affirmatively further fair housing as required by these regulations.

Project-basing in Orleans Parish is a viable and important option to tenant-based assistance because PBVs support redevelopment and revitalization efforts. HANO's Administrative Plan allows for HANO to consider applications for PBV assistance using both the competitive and non-competitive methods as appropriate and allowable under regulations and statute. HANO will also select properties for PBV subsidy as replacement units for displaced families as part of the Choice Neighborhood Initiative Grant (CNI).

The majority of Census Tracts in the City of New Orleans have poverty rates greater than 20%, including tracts that include conventional and scattered site developments and much of the City's blighted housing. Therefore, some PBV units will be located in census tracts with poverty rates greater than 20%. However HANO will use its PBV Program to offer participant families a greater choice of quality and affordable housing. As part of CNI, HANO will provide 520 PBV off-site replacement units. These replacement units have been noted by HUD as being integral to rebuilding the core of New Orleans. Additional housing development selected under the PBV program will conform to all relevant HUD requirements and goals specified in the HCVP Administrative Plan and the PHA Plan.

HANO currently has 2,493 units under Housing Assistance Payments (HAP) contracts and anticipates entering into contracts for an additional 38 units in the coming fiscal year. The planned PBV units are located in the Faubourg Lafayette area of Central City New Orleans.

## PBV UNITS UNDER HAP

Development Name	Development Address	HAP Effective Date	Units Under HAP
Marais Property/1501 Master Tenant LLC	1501 Canal Street 70112	5/21/2014	106
1508 Orleans, LLC	1508 Basin Street 70116	4/19/2018	33
1601 Orleans, LLC	1601 Basin Street 70116	4/19/2018	31
4948 Chef Menteur Apts	4948 Chef Menteur Hwy 70126	3/31/2022	42
2 Oaks Apartments	14600 Dwyer Rd. 70129	7/27/2018	100
McDonogh 19	5909 St Claude Ave. 70117	1/7/2022	16
Abundance Square	2906 Desire Pkwy 70126	4/17/2014	27
Artspace Bell School	2100 Ursulines 70116	3/23/2018	19
Blueberry Hill Homes	Scattered Sites (Lower Ninth Ward)	11/6/2018	41
Capdau Home for the Aged	3821 Franklin Avenue 70122	11/12/2020	80
City Square 162	1501 St Louis St. 70112	8/18/2021	15
CNI Redevelopment	1012-1014 N Broad Ave. 70119	3/8/2021	2
Filmore Parc I	5172 St. Anthony Avenue 70122	7/1/2012	71
Filmore Parc II	5172 St. Anthony Avenue 70122	8/1/2012	32
Flint Goodridge	2425 Louisiana Ave 70115	11/1/2017	87
Forest Park	3708 Garden Oaks Drive 70114	4/2/2009	71
G.O. Mondy School	2325 – 2327 St Philip 70119	6/29/2017	32
Guste I	1301 Simon Bolivar 70113	3/16/2018	15
Guste III-Stages I-VI	1301 Simon Bolivar 70113	9/30/2016	46
Heritage at Columbia Parc	1401 Caton St 70122	5/13/2013	83
Holy Angels Partners	3500 St. Claude 70117	10/1/2003	33
Iberville Offsite Rehab 1	Scattered Sites	4/15/2014	20
Iberville Offsite Rehab 2	Scattered Sites	4/15/2014	20
Iberville Offsite Rehab 3	Scattered Sites	3/31/2017	28
Jacksons Landing North	3204 Memorial Park Dr 70114	12/31/2010	35
Jackson's Landing South	3400 Garden Oaks 70114	12/31/2010	14
King Rampart Apartments	1931 MLK Blvd 70113	11/26/2012	7
Lafitte Offsite Scattered Homes	2200 Lafitte Street 70119	10/15/2013	4
Lafitte VA Rehab	2200 Lafitte Street 70119	10/6/2012	38
Lafitte Onsite I	2200 Lafitte Street 70119	5/19/2011	60
Lafitte Onsite II	2200 Lafitte Street 70119	11/7/2012	35
Lafitte Senior	700 N Galvez St 70119	3/8/2017	70
Lake Forest Manor	10101 Lake Forest Dr 70127	9/28/22	202
McCaleb Supportive Housing	2412 Clio St 70113	10/17/2012	21
On Iberville Phase IV, LLC	215 Tremé Street 70112	11/9/2017	51
Redemptorist Apartments	950 Josephine St 70130	10/10/2017	105
Redmellon 3501 St. Claude	3501 St. Claude 70117	12/31/2010	12



Redmellon Opportunity Homes	Scattered Sites	2/28/2011	28
Redmellon Renewal Homes	Scattered Sites	2/18/2011	11
Reveal New Orleans	13733 Chef Menteur Hwy 70129	3/31/2022	150
River Garden Elderly Apartments	2017 Laurel St. 70130	4/21/2009	56
Rosa F. Keller Building	2222 Tulane Ave 70119	7/6/2012	15
Roman Bienville – Lafitte	1810 Bienville St. 70112	6/9/2015	2
Roman Bienville – Lafitte	219 N. Roman St. 70112	6/11/2015	5
Roman Bienville – Lafitte	1810 Bienville St. 70112	6/24/2015	1
Roman Bienville – Iberville	1830 Bienville St. 70112	5/14/2015	9
Saint Ann Square 2017	2123 Ursulines Avenue 70119	8/14/2020	59
Sacred Heart at St. Bernard	1720 St. Bernard Ave. 70116	9/21/2018	13
Savoy Place I	2906 Desire Parkway 70126	2/1/2019	113
Savoy Place II	2906 Desire Parkway 70126	3/30/2011	89
SBP L9	Scattered Sites 70117	9/23/2021	15
SBP St. Peter St.	2645 Toulouse St 70119	4/3/2020	16
Skyview Townhomes	Scattered Sites 70126	12/31/2010	15
The Crescent Club	3000 Tulane Ave 70179	2/4/2011	30
The Preserve New Orleans I LLC	4301 Tulane Ave 70179	2/4/2011	27
Treasure Village	2906 Desire Parkway 70126	7/1/2014	26
Tudor Square Elderly	3011 Milan St 70125	6/1/2012	41
Walnut Square	8501 N I-10 Service Rd 70127	7/13/2009	48
Wisdom Manor	8900 Quince St 70118	2/4/2012	20
<b>Total Units Under PBV Contract</b>			<b>2,493</b>

### **Units Approved for Vacancy for Modernization**

HANO plans to conduct interior and exterior modernization activities in vacant units at the following properties: Fischer, Florida, Scattered Sites, and Guste. Planned exterior modernization activities include but are not limited to porch rehabs, repairs to balconies, railings, columns, and canopies, exterior lighting, exterior painting and caulking, siding repairs, roofing repairs and repair to exterior doors and soffits. Planned interior modernization activities include but are not limited to repairing and replacing flooring and flooring rehab, repairing and replacing counters and sinks in kitchens and bathrooms, repairing and replacing cabinetry in kitchens and bathrooms, painting, repairing interior doors, carpentry, plumbing, electrical work, replacing fixtures and appliances, repairing and replacing tubs and showers, repairing and replacing HVAC units and systems, and mechanical upgrades. The extensive modernization will require units to be vacant.



## **B.3 PROGRESS ON HANO 5 YEAR GOALS**

**October 1, 2020 –September 30, 2025**

**Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

**Goal 1: Develop a long-term affordable housing expansion and preservation strategy**

- Objective 1.1 Plan for redevelopment of scattered sites and other vacant parcels utilizing a neighborhood-centric approach.
- Objective 1.2 Seek publicly-owned vacant lots within close proximity to develop live, work, and play amenities.
- Objective 1.3 Explore opportunities for self-development by HANO.
- Objective 1.4 Leverage resources to build new housing and modernize existing housing.
- Objective 1.5 Implement sustainability measures to preserve and protect HANO's portfolio.

**Goal 2: Expand HANO's housing portfolio to include rental and homeownership units**

- Objective 2.1 Facilitate development of 1,000+ affordable housing units during the plan period.
- Objective 2.2 Continue growing the Project Based Voucher program as an incentivizing tool for new housing development
- Objective 2.3 Increase the usage of homeownership vouchers to 5% of HCV households
- Objective 2.4 Recruit partners to provide down-payment assistance for homeowners and security deposit assistance for renters
- Objective 2.5 Utilize Federal low income housing tax credits and other financing tools to support affordable housing development
- Objective 2.6 Utilize community land trusts to ensure long-term affordable homes

**Goal 3: Improve customer service using training, technology, and community engagement.**

- Objective 3.1 Reduce transaction times for clients, landlords, and other business partners.
- Objective 3.2 Establish a call center along with defined response times and tracking protocols
- Objective 3.3 Distribute quarterly customer satisfaction surveys to obtain feedback from internal and external customers
- Objective 3.4 Provide ongoing staff training in customer relations and interpersonal skill building

**Goal 4: Maintain High-Performer status in the Housing Choice Voucher Program and Public Housing Program**

- Objective 4.1 Improve the Agency's performance under the Public Housing Assessment System (PHAS)
- Objective 4.2 Retool HANO's asset management protocol to drive continuous improvement in all areas of property management
- Objective 4.3 Maintain high performer status under the Section 8 Management Assessment Program (SEMAP)
- Objective 4.4 Ensure ongoing compliance monitoring and tracking of SEMAP and other HCV performance metrics
- Objective 4.5 Apply to become an MTW agency after achieving high performer status

**Goal 5: Rebrand the Agency to improve HANO's public image**

- Objective 5.1 Develop a rebranding strategy to strengthen HANO's image and foster positive perceptions of the Agency.
- Objective 5.2 Create a new visual identity using social media and other platforms (website, Facebook, Instagram)
- Objective 5.3 Enlist ambassadors and partnerships to help HANO achieve an active and engaging community presence.
- Objective 5.4 Create and maintain a media kit to facilitate communication with press outlets
- Objective 5.5 Share information about HANO initiatives through expanded participation in community and industry associations, at local and national levels

**Goal 6: Streamline business operations to create efficiencies, effectiveness and reduce cost**

- Objective 6.1 Upgrade to an integrated computer system that will encompass both programmatic and financial functionality
- Objective 6.2 Organize a new call center along with standard operating procedures, response times, and tracking protocols
- Objective 6.3 Evaluate and update work processes to improve efficiency and reduce time to complete client and landlord transactions
- Objective 6.4 Foster continuous performance improvement (CPI) by providing training and professional development opportunities to all staff

**Goal 7: Reposition underperforming assets**

- Objective 7.1 Participate in Asset Repositioning training conducted by HUD and other industry organizations.
- Objective 7.2 Develop criteria for identifying and prioritizing underperforming properties and for determining appropriate repositioning strategies
- Objective 7.3 Utilize the newly-developed criteria to analyze operational, capital, and financial needs, and to delineate short and long-term approaches for impacted properties.
- Objective 7.4 Implement planned repositioning with continuous monitoring of property performance

**Goal 8: Upgrade technology to streamline business processes including updating hardware and software**

- Objective 8.1 Expand existing software to provide tenant portal services in areas such as virtual wait list applications, no-contact recertifications, and electronic rent payments
- Objective 8.2 Convert office desktop computers to touch screen laptop docking stations that can be readily adapted for telework purposes
- Objective 8.3 Procure text blast and robocall technology to electronically send up-to-date notices to all tenants, landlords, and business partners
- Objective 8.4 Utilize document imaging software to convert program documents to an electronic format, ultimately reducing file storage and expediting record retrieval

**Goal 9: Implement sustainable self-sufficiency programs that create economic mobility and generational wealth**

- Objective 9.1 Increase homeownership opportunities for HANO clients
- Objective 9.2 Increase client participation in the Family Self-Sufficiency (FSS) Program
- Objective 9.3 Expand opportunities for client employment and/or entrepreneurship including participation in Section 3 programs
- Objective 9.4 Increase attainment of High School Equivalency (HSE; formerly GED) credentials as well as attainment of college level education for all HANO clients
- Objective 9.5 Increase the percentage of tenants living in low poverty neighborhoods
- Objective 9.6 Increase self-sufficiency program awareness and participation among clients who are members of vulnerable population groups

**Goal 10: Improve financial sustainability through conservative investments, cash management, partnerships, and grant opportunities**

- Objective 10.1 Research and implement cost savings related to central office space needs and relocation possibilities.
- Objective 10.2 Develop a team of policy/grant writers to seek grants to support all functions of HANO
- Objective 10.3 Continue partnerships with third parties to fund development projects and other Agency initiatives.
- Objective 10.4 Study best practices and implement measures that will further HANO's financial sustainability.

## B5. HANO PROGRESS PREPORT ON 5 YEAR GOALS

### Goal 1: Develop a long-term affordable housing expansion and preservation strategy for HANO's portfolio.

HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		PROGRESS TOWARDS GOALS
<b>Objective 1.1</b>	<b>Plan for redevelopment of scattered sites and other vacant parcels utilizing a neighborhood-centric approach</b>	<p>Redevelopment of up to 136 units in the Bywater area, including up to 82 affordable housing units. The developer will submit at a 9% LIHTC application to the Louisiana Housing Corporation in spring 2023.</p> <p>Development of six scattered sites in the West Carrollton and Uptown neighborhoods. Four of the six sites have received Section 106 approval.</p>
<b>Objective 1.2</b>	<b>Seek publicly-owned vacant lots within close proximity to develop live, work, and play amenities.</b>	City Square 162 is a mixed- income, multifamily building with 76 apartments that are close to transit, the central business district, and the Lafitte Greenway. Development was completed in August 2021.
<b>Objective 1.3</b>	<b>Explore opportunities for self-development by HANO.</b>	In the current economic climate, HANO continues to explore self-development opportunities for either rental or homeownership. Staff is working on a Scattered Site Development Strategy, which is expected to be completed by summer 2023.
<b>Objective 1.4</b>	<b>Leverage resources to build new housing and modernize existing housing.</b>	<ul style="list-style-type: none"> <li>HANO has leveraged its project-based vouchers (PBV) to develop new housing. As part of the CNI redevelopment, 469 PBV units have been constructed in Tremé. An additional 23 PBV units are planned for Winn-Dixie Phase II and another 40 PBV units at Faubourg Lafitte, both of which are within the CNI boundaries.</li> <li>In the Bywater and Carrollton neighborhoods, 34 and 77 PBV vouchers are planned for new construction, respectively.</li> </ul>
<b>Objective 1.5</b>	<b>Implement sustainability measures to preserve and protect HANO's portfolio</b>	HANO has increased the term of PBV contracts in accordance with HOTMA regulations that allows PBV contracts to increase from 20 years to 25 years.

**Goal 2: Expand HANO's affordable housing portfolio to include rental and homeownership units.**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 2.1</b>	<b>Facilitate development of 1,000+ affordable housing units during the plan period.</b>	HANO is on target to develop 1,000 affordable housing units between 2021 and 2025. HANO expects to develop 236 units by 2025, including 45 rental units for Winn-Dixie Phase 2, 110 rental units in the Carrollton neighborhood, and 51 rental units at Faubourg Lafitte. HANO expects to create affordable homeownership opportunities through self-development and/or development with third-party partners.
<b>Objective 2.2</b>	<b>Continue growing the Project Based Voucher program as an incentivizing tool for new housing development</b>	HANO is steadily increasing the use of project based vouchers and has 38 "Agreements to enter into a HAP contract" (AHAP) that are expected to convert to HAP contracts in the next fiscal year. HANO has roughly 400 PBV commitments for upcoming developments. The agency plans to release a Request for Proposal for additional PBV projects in 2023.
<b>Objective 2.3</b>	<b>Increase the usage of homeownership vouchers to 5% of HCV households</b>	HANO has provided 515 homeownership vouchers which is 2.8% of HANO's 18,178 HCV allocated vouchers. HANO is working to increase usage to 5%.
<b>Objective 2.4</b>	<b>Recruit partners to provide down-payment assistance for homeowners and security deposit assistance for renters</b>	HANO has partnered with the City of New Orleans to provide down payment and closing costs subsidies to HANO assisted first- time homebuyers.
<b>Objective 2.5</b>	<b>Utilize Federal low income housing tax credits and other financing tools to support affordable housing development</b>	HANO's third-party development partners have secured low- income housing tax credits (LIHTC) for the development of affordable housing. A total of 76 new units were completed at City Square 162. Another 45 units will be developed under Winn-Dixie Phase 2, which received an allocation of 9% tax 2023 credits. A total of 22 units will be developed as part of 2256 Baronne Street, using 4% tax credits. .

<b>Objective 2.6</b>	<b>Utilize community land trusts to ensure long-term affordable homes</b>	HANO is considering the development of affordable housing in partnership with third party developers as well as organizations such as Crescent City Community land trust.
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**Goal 3: Improve customer service using training, technology, and community engagement.**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 3.1</b>	<b>Reduce transaction times for clients, landlords, and other business partners</b>	HANO implemented the use of DocuSign and created a Landlord Liaison to reduce transaction times for clients, landlords, and other business partners. HANO is implementing virtual orientations and briefings for new voucher holders to ensure understanding of the housing search and lease up process as well as landlord orientations to educate prospective participant landlords on the HCV Program.
<b>Objective 3.2</b>	<b>Establish a call center along with defined response times and tracking protocols</b>	HANO established a call center in March 2021 that is fully operational with staff who are trained to answer questions and track responses.
<b>Objective 3.3</b>	<b>Distribute quarterly customer satisfaction surveys to obtain feedback from internal and external customers</b>	HANO completed tenant surveys in 2020 as part of the ROSS grant application.
<b>Objective 3.4</b>	<b>Provide ongoing staff training in customer relations and interpersonal skill building</b>	All call center staff were trained on customer relations, fair housing, and HCV program details such as the Administrative Plan and Emphasys software.

**Goal 4: Maintain High-Performer status in the Housing Choice Voucher Program and Public Housing Program**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>	<b>PROGRESS TOWARDS GOALS</b>
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<b>Objective 4.1</b>	<b>Improve the Agency's performance under the Public Housing Assessment System (PHAS)</b>	HANO latest composite score of 76 was in 2018 which places the agency as an overall Standard Performer in the Public Housing Program which is a point higher than 2017.
<b>Objective 4.2</b>	<b>Retool HANO's asset management protocol to drive continuous improvement in all areas of property management</b>	HANO is in the process of retooling its asset management protocol to ensure that property managers focus on the day-to-day operations of rental properties while asset managers focus on the financial integrity and administrative viability of not only developments managed by HANO but those managed by third parties as well.

<b>Objective 4.3</b>	<b>Maintain high performer status under the Section 8 Management Assessment Program (SEMAP)</b>	HANO is currently a high performer under HUD's SEMAP assessment system. Under the latest assessment for FY 2019, HANO still has room for improvement in the Family Self-Sufficiency (FSS) category & QC inspections. The agency has hired a full time FSS Housing Specialist and has contracted with a third party to perform inspections. HANO will be a high performer for FY 2022 utilizing a HUD COVID waiver to carry forward its most recent SEMAP assessment. The HCVP Department is monitoring its SEMAP performance monthly to stay on track with this goal.
<b>Objective 4.4</b>	<b>Ensure ongoing compliance monitoring and tracking of SEMAP and other HCV performance metrics</b>	Files are audited monthly for compliance monitoring and tracking of SEMAP indicators as well as other HCV metrics.
<b>Objective 4.5</b>	<b>Apply to become an MTW agency after achieving high performer status</b>	HANO plans to apply to Cohort 5 of the MTW program when it is announced.

**Goal 5: Rebrand the Agency to improve HANO's public image.**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 5.1</b>	<b>Develop a rebranding strategy to strengthen HANO's image and foster positive perceptions of the Agency.</b>	HANO has developed a strategy to rebrand the agency which is updated periodically with additional tasks as new programs and projects are launched. Multiple tasks have been implemented, with others to follow this year. An annual calendar of opportunities has been created for 2022 and will be used as a guide to identifying and creating positive publicity stories for the agency.

<b>Objective 5.2</b>	<b>Create a new visual identity using social media and other platforms (website, Facebook, Instagram)</b>	HANO is currently utilizing Facebook, Twitter, and Instagram as social media platforms to provide updates, notices, features and activity information. A new website was launched in 2020 which is updated regularly. Will be undertaking an overall audit of the website in order to identify additional opportunities for user-friendly interaction and best placement of information.
<b>Objective 5.3</b>	<b>Enlist ambassadors and partnerships to help HANO achieve an active and engaging community presence.</b>	HANO staff were enlisted as Ambassadors in 2020. Ambassadors worked together with the Communications department to develop core values for the Agency and a plan to increase HANO's presence at community meetings in the Second quarter of 2021. As a result, HANO has partnered with the Mayor's Office of Neighborhood Engagement to distribute HANO materials during neighborhood events and activities throughout the city.

<b>Objective 5.4</b>	<b>Create and maintain a media kit to facilitate communication with press outlets</b>	HANO developed a digital agency fact sheet as well as posted information on HANO's Board of Commissioners, our Executive Director and Executive Staff all on our external website, which is all accessible to media. HANO is in the process of creating a general informational video on the successes of HANO and its residents to facilitate communication with press outlets. Anticipate the video being completed and uploaded later this summer.
<b>Objective 5.5</b>	<b>Share information about HANO initiatives through expanded participation in community and industry associations, at local and national levels</b>	<ul style="list-style-type: none"> <li>• HANO provided materials on HANO initiatives and services to New Orleans residents during the City's Community Clean Up event and during community meetings hosted by the Mayor's Office of Neighborhood Engagement. Materials will also be shared at the New Orleans Public Libraries during the City's Community Office Hours. In addition, HCV staff joined City Council District E's Multi-family Housing Committee to offer expertise on housing quality standards.</li> <li>• HANO's Police Department has also shared information on HANO's initiatives through its participation in the City's Neighborhood Leaders' Roundtable discussion on public safety.</li> <li>• A monthly meeting is being established in 2022 between the City of New Orleans Communications Department, HANO's Communications Department, and the City's Housing Department.</li> </ul>

**Goal 6: Streamline Business Operations to create efficiencies, effectiveness and reduce cost.**



HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		PROGRESS TOWARDS GOALS
Objective 6.1	Upgrade to an integrated computer system that will encompass both programmatic and financial functionality	HANO is launching a new financial system that will encompass both programmatic and financial functionality with implementation planned for spring 2023.
Objective 6.2	Organize a new call center along with standard operating procedures, response times, and tracking protocols	Early 2021 standing operating procedures for the call center were developed. We are tracking utilizing Cysco protocols which track response time, hold time, and the length of conversations. The number of calls received by each operator are also tracked and their pickup rate. HANO is exploring additional technological tools to enhance tracking and quality control of calls.

Objective 6.3	Evaluate and update work processes to improve efficiency and reduce time to complete client and landlord transactions	After an evaluation and due to the COVID-19 pandemic, HANO began allowing email correspondence, and DocuSign documents to transact business which is in addition to in-person and mailed correspondence.
Objective 6.4	Foster continuous performance improvement (CPI) by providing training and professional development opportunities to all staff	HANO employees are provided with access to a comprehensive Learning Management System (LMS) that consist of an extensive library of professional development trainings. The trainings provide an enhancement to staffs' knowledge, skills, and abilities in many facets of professional development.

**Goal 7: Reposition underperforming assets.**

HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		PROGRESS TOWARDS GOALS
Objective 7.1	Participate in Asset Repositioning training conducted by HUD and other industry organizations.	Staff will participate in Asset Repositioning Training and plans to continue this type of training in 2022.
Objective 7.2	Develop criteria for identifying and prioritizing underperforming properties and for determining appropriate repositioning strategies	HANO has identified properties that has self-developed as well as those constructed in partnership with third-party developers and we are currently working on a performance improvement strategy to for these sites.

<b>Objective 7.3</b>	<b>Utilize the newly-developed criteria to analyze operational, capital, and financial needs, and to delineate short and long-term approaches for impacted properties.</b>	HANO has begun analyzing operational costs at self-developed properties as well as properties developed by third-party partners to delineate short and long-term approaches to address the individual needs of each site. Once a plan has been established and implemented, HANO will continue to identify and review its portfolio to develop similar strategies for any other sites that may need repositioning.
<b>Objective 7.4</b>	<b>Implement planned repositioning with continuous monitoring of property performance</b>	HANO has begun analyzing operational costs at its self-developed properties as well as properties developed by third-party partners to delineate short and long-term approaches to address the individual needs of each site.

**Goal 8: Upgrade technology to streamline business processes including updating hardware and software.**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 8.1</b>	<b>Expand existing software to provide tenant portal services in areas such as virtual wait list applications, no-contact certifications, and electronic rent payments</b>	HANO has implemented an applicant portal that allows a virtual wait list. A tenant portal is under development.
<b>Objective 8.2</b>	<b>Convert office desktop computers to laptop docking stations that can be readily adapted for telework purposes</b>	All staff have been converted from desktops to either laptops or docking stations.
<b>Objective 8.3</b>	<b>Procure text blast and/or robocall technology to electronically send up-to-date notices to all tenants, landlords, and business partners</b>	HANO procured and implemented text blast technology to electronically send notices.
<b>Objective 8.4</b>	<b>Utilize document imaging software to convert program documents to an electronic format, ultimately reducing file storage and expediting record retrieval</b>	The Legal Department is managing the contract to image the historical board documents. Under that contract, the bound volumes of the historic board documents will be scanned and converted to electronic format in March 2021.

**Goal 9: Implement sustainable self-sufficiency programs that create economic mobility and generational wealth**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 9.1</b>	<b>Increase homeownership opportunities for HANO clients</b>	HANO has placed homeownership applications on-line at hano.org. A dedicated homeownership counselor responds to applicants and assist them with navigating the homeownership process.
<b>Objective 9.2</b>	<b>Increase client participation in the Family Self-Sufficiency (FSS) Program</b>	HANO applied and was awarded a grant to increase from one FSS coordinator to two coordinators. Both coordinators will work to recruit additional clients to the FSS program.
<b>Objective 9.3</b>	<b>Expand opportunities for client employment and/or entrepreneurship including participation in Section 3 programs</b>	HANO is continuing its Resident Entrepreneur Training Institute (RETI) that helps residents develop and implement business ideas. HANO also continues its Section 3 job opportunities and on-site construction training.
<b>Objective 9.4</b>	<b>Increase attainment of High School Equivalency (HSE; formerly GED) credentials as well as attainment of college level education for all HANO clients</b>	HANO has partnered with the Adult Education Program at Delgado Community College, TCA, and Hope House to provide education services to HANO clients. Virtual classes are also available.
<b>Objective 9.5</b>	<b>Increase the percentage of tenants living in low poverty neighborhoods</b>	<ul style="list-style-type: none"> <li>HANO has established exception payment standards based on the established Small Area Fair Market Rents (SAFMRs) for eight zip codes within HANO's jurisdiction to encourage better access to low poverty areas.</li> <li>HANO received HUD's Mobility Demonstration Program grant. The program is funded at 3.9 million and is designed to increase the percentage of tenants living in low poverty areas. The program has commenced, and families are actively enrolling as part of the Community Choice Demonstration's pilot.</li> </ul>

<b>Objective 9.6</b>	<b>Increase self-sufficiency program awareness and participation among clients who are members of vulnerable population groups</b>	HANO applied and was awarded a grant to increase from one FSS coordinator to two coordinators. Having two coordinators will enable HANO to develop specific procedures targeting self-sufficiency of vulnerable populations including disabled individuals and formerly incarcerated individuals. As this is the 3rd year of the current FSS grant cycle, HANO plans on requesting FSS funding in the next cycle for an additional grant funded FSS coordinator position, if possible, which will help to meet the demand of our residents to participate in the FSS program.
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**Goal 10: Improve financial sustainability through conservative investments, cash management, partnerships, and grant opportunities**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 10.1</b>	<b>Research and implement cost savings related to central office space needs and relocation possibilities.</b>	HANO's Asset Management department completed an evaluation of central office space. From this evaluation, HCV office spaces were reconfigured and call center staff were relocated to a central call center location.
<b>Objective 10.2</b>	<b>Develop a team of policy/grant writers to seek grants to support all functions of HANO</b>	HANO has sought more grants utilizing a team approach in the last fiscal year than in the previous five years. HANO has applied and received the FSS grant, ROSS grant, and the CNI supplemental grant. HANO also applied to be a part of HCV Mobility grant program and the W.K. Kellogg Race and Equity grant.

<b>Objective 10.3</b>	<b>Continue partnerships with third parties to fund development projects and other Agency initiatives.</b>	HANO partnered with the City of New Orleans, the Louisiana Housing Corporation and the City Planning Commission to host a Developer Symposium to educate developers on each agency's affordable housing programs and processes. HANO is using the information discussed at the symposium to create its Vacant Lot Scattered Site Strategy. In addition, HANO intends to host more informational and listening sessions with developers as well as other City and State agencies to implement industry best practices for future affordable projects.
<b>Objective 10.4</b>	<b>Study best practices and implement measures that will further HANO's financial sustainability.</b>	HANO is studying best practices as a part of developing asset repositioning strategies.



<b>B.4</b>	<b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. <b><u>Optional 5-Year Action Plan</u></b> <i>See HUD Form 50075.2 approved by HUD on July 7, 2021.</i>

<b>B.5</b>	<b>Most Recent Fiscal Year Audit.</b>
	(a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input checked="" type="checkbox"/>  (b) If yes, please describe:  The HANO audit for FY 2021 was completed in March 31, 2022 and there were no findings.



## **C. Other Documents and Certifications**

### **C.1 Resident Advisory Board (RAB) Comments** **Plan Consultation Meeting – May 11, 2022**

Date	RAB Comments	HANO Response
5-9-23	Residents need to be more educated about changes in policy. Residents need different modes of classes not just written but video or audio as well.	HANO's Communication team is developing videos to provide information to tenants.
5-9-23	What are the rules for a live-in aide?	A live-in aide is a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities. A family's request for a live-in aide must be made in writing. The aide must be determined to be essential to the care and well-being of the persons; is not obligated for the support of the person(s); and would not be living in the unit except to provide the necessary supportive services.
5-9-23	What is happening with 1717 De Armas?	HANO will be addressing this property in its upcoming Scattered Site strategy.
5-9-23	When does HANO plan to submit the ACOP with the PHA Annual Plan and the 5 Year Capital Fund Plan?	HANO plans to submit the PHA Annual Plan along with the Admissions and Occupancy Plan and the HCV Administrative Plan prior to July 15, 2023. HANO plans to have a public hearing on May 24, 2023 and submit to HANO Board the last week in June 2023.
5-10-23	These are large documents, and we believe that we did not have enough time to thoroughly review. Can we remove ACOP from the PHA Annual Submission.	HANO has revised the Admissions and Continue Occupancy Plan (ACOP) to make it more in line with the HCV Administrative Plan and to correct grammar to make the document more user friendly. The only policy change captured is mandated by HUD in response to the Housing Opportunity Through Modernization (HOTMA) act that specifies that over-income tenants cannot participate in the Resident Advisory Councils. All sites were provided hard copies of the PHA Annual Plan that included the HCV Administrative Plan and ACOP on April 10, 2023 and these documents were posted to hano.org. RAB members were also sent a letter with links to the PHA Annual Plan on April 20, 2023. RAB members can provide comments on ACOP until May 24, 2023. HANO will also host a public hearing on the 24 <sup>th</sup> for audio public comments if RAB members wanted to attend and provide comments.
5-10-23	What does the 200,000 represent for Guste High Rise in the 2023 5 Year Capital Fund Plan?	These funds are for the lobby upgrades at Guste High Rise. These are anticipated projects that are not already being procured. Prior grants will be expended prior to expending these funds.



5-10-23	Is there funding in the CFP for other communities including third party managed communities?	The HANO 5 Year CFP Plan focuses on public housing units and HANO owned and managed properties. We do have placeholders for mixed finance communities, but these often require revisions as these projects are identified.
5-10-23	Why doesn't Florida have any funds designated until 2027? When a washer and dryer are broken, we are often told there is no funding.	Florida is receiving funding under prior year CFP plans. The funding is for modernization projects not operations. Appliances are day to day operations and are handled through an operating budget.
5-10-23	If a head of household wants to move, but asks that another adult in the household maintain the lease and the unit, is this allowed.	Yes. HANO has made it clear that this is an option, but HANO has to confirm that the initial head of household has moved to a new rental or to homeownership. The person that assumes the lease has to have lived in the unit for a year.
5-10-23	How often does HANO upgrade family composition under the PBV waitlist program? People sometimes are just sitting on a one bedroom despite family composition changing.	The onus is on the applicant to update family composition. HANO is soliciting for a contractor to accomplish a PBV purge that will update that information.  HANO is also awaiting approval from HUD on the request to amend occupancy standards for current tenants.
5-10-23	HANO has offered PBV vouchers to families that are already housed. This causes backlash and it appears to be counterproductive to pulling from the tenant-based waitlist.	Because of the number of vouchers that HANO has allotted coupled with the rate of turnover, HANO will be able to offer PBV and tenant-based vouchers. HANO should be able to offer approximately 300 vouchers a month to those on the tenant-based waitlist. We have approximately 10,000 on the tenant-based waitlist and at this rate, we will be able to house most within three years.
5-10-23	Why are we removing disaster preferences?	The preference was for past disasters that are no longer applicable.
5-10-23	There was a letter that was sent to tenants stating that they increased flat rents. How did that occur?	HANO amends its flat rate rent amounts based on HUD payment standard changes.
5-10-23	How did we arrive at what sites will be demolished or the disposition of sites?	There are no planned demolitions. HANO is developing a new scattered sites strategy to determine how to develop scattered sites.
5-10-23	HANO Residents should receive a rent statement so that tenants can know charges that are being assessed?	HANO will work with third party managers to ensure rent statements are provided.
5-10-23	What does it mean when the PHA Annual Plan states that units are approved for modernization? I see that Florida is included.	HANO plans to have only one unit vacant for modernization.

## **C.2 CERTIFICATION BY STATE OR LOCAL OFFICIALS**

Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

**I, Tyra Johnson Brown , the Director of Housing Policy & Community Development**  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years N/A and/or Annual PHA Plan for fiscal  
year beginning October 1, 2023 of the Housing Authority of New Orleans is consistent with  
the *PHA Name*  
Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

**City of New Orleans**

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

The PHA Plan is consistent with the Consolidated Plan including the Assessment of Fair Housing  
Plan through a combined focus on providing affordable housing; fostering community  
development, and further fair housing in the City of New Orleans. Guided by mutual goals, these  
initiatives work together in addressing the housing and supportive services needs of low  
income residents throughout the community.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will  
prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:

**Tyra Johnson Brown**

Title:

**Director of Housing Policy & Community Development**

Signature: 

Date: 4/21/2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S.  
Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information  
are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to  
ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing  
instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD  
may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

### **C.3 CIVIL RIGHTS CERTIFICATION**

Form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations.*

# Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

## PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or \_\_\_ X \_\_\_ Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning \_\_\_ October 1, 2023 \_\_\_, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);



- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of New Orleans  
PHA Name

LA001  
PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2023-2024

☒ 5-Year Capital Fund Action Plan for Fiscal Years 2023 - 2027

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director

Signature

Date

Name Board Chairman

Signature

Date



<b>C.4</b>	<b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
	<p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

## Public Hearing Comments

Please click [here](#).





## Stakeholder Comments



June 27, 2023

Cashauna Hill  
Executive Director  
Louisiana Fair Housing Action Center  
1340 Poydras, St. Suite 710  
New Orleans, Louisiana 70112

Dear Ms. Hill:

We greatly appreciate comments from Louisiana Fair Housing Action Center (LaFHAC) regarding HANO's Annual PHA Plan for fiscal year beginning October 1, 2023. We are pleased to continue our partnership with your organization as we work to provide affordable housing opportunities for New Orleans residents. Our responses to your comments are captured below.

#### **PHA Annual Plan**

1. We appreciate HANO's response last year to our comment letter, welcoming our input on its policy of awarding extra points to proposed PBV units in low-poverty neighborhoods to advance its commitment to affirmatively further fair housing. That response states that RFPs and scoring criteria are posted publicly at HANO.org for our review. Unfortunately, after a thorough review of the website, we couldn't find any RFP solicitations and would like to request the most recent one, including the scoring criteria, to review.

**HANO Response:** Active and closed solicitations are found under the business tab on hano.org. Closed solicitations date back to January 2023. Currently, HANO does not have any open PBV solicitations.

2. We're excited to hear that HANO is reevaluating its eight-year-old scatter sites plan and urge the agency to set up listening sessions with stakeholders to solicit feedback and insight. We continue to urge HANO to consider repurposing many of the smaller lots it owns in high-opportunity or gentrifying areas like the Bywater, Tremé, and Uptown for affordable 4-plexes, as now allowed by the Comprehensive Zoning Ordinance.

**HANO Response:** In reevaluating its scattered sites plan, HANO will analyze the best use for small lots including multi-unit rentals and homeownership units. HANO will provide an opportunity for public feedback.

## ACOP

1. We remain confused about the full implementation of HANO's otherwise exemplary criminal background screening policy. On page 90 of the 2022 Annual plan, in Appendix 1: Admissions and Continued Occupancy Policy, HANO notes a new addition in red, stating that "All third parties contracted after October 1, 2022 who are managing public housing units must adhere to this policy" (referring to HANO's criminal background screening policy). However, the change was not made in the 2022 ACOP. Further, the change has not been made in the 2023 ACOP draft either. LaFHAC asks HANO to add this language to its 2023 ACOP and guarantee that any third-party contracted after October 1, 2022 to build or operate public housing will be using HANO's or LHC's criminal background screening policy.

**HANO Response:** Language denoting that all third parties contracted after October 1, 2022 must adhere to HANO's criminal background policy will be placed in the revised 2023 ACOP. This language should have been placed in the 2022 ACOP revision. Please see screenshot of 2023 revision.

**Screening for Criminal Record**

**Other Criminal Records**

Except as mandated by federal law, no applicant for HANO-assisted housing will be automatically barred from receiving housing assistance because of his or her criminal background.

For applicants not barred by federal law, the applicant's criminal conviction(s) will be assessed to determine the risk the applicant poses to the safety and well-being of the community using valid written criteria, applicable laws including fair housing laws, applicable regulations, and sound management practices.

Applicants whose conviction(s) do not suggest a significant level of risk will be deemed admissible to housing if otherwise eligible.

Applicants whose conviction(s) suggest a significant level of risk will be reviewed by a panel of HANO officials or its Agents to assess, based on the totality of the circumstances including any information the applicant wishes to provide, whether the applicant should be admitted to housing or denied. HANO or its Agents may, at their full discretion, include external experts in the panel. If the panel recommends denial of an applicant, the applicant may request an appeal of the decision. All appeals shall follow the procedures in Chapter 14 of the ACOP: Complaints, Grievances, and Appeals. The risk assessment criteria HANO and its Agents use and the review process are detailed in the criminal background screening procedures.

**All third parties contracted after October 1, 2022 who are managing public housing units must adhere to this policy to HANO's criminal background screening procedures.**

2. LaFHAC has serious concerns about including rent payment habits in the Screening for Suitability on page 39-42 of the proposed ACOP. There is no reason a tenant's rent payment habits in a previous unsubsidized home would have any bearing on their ability to pay rent when subsidized. In a city where 57% of renter households pay more than 30% of their income on rent, this policy could also disqualify the vast majority of applicants who clearly need access to affordable housing the most.<sup>1</sup> We strongly recommend an opposite policy and ask HANO to specify that rent payment habits when a tenant did not have the benefits of subsidy should not be used to deny a tenant admission to a subsidized unit.

**HANO Response:** HANO's review of rent payment habits are limited in its scope. HANO reviews the history of payments in two circumstances:

- 1) when admitting to market rate units; and



2) when a publicly assisted tenant is requesting admission to another program (public housing to HCV). Payment history is relevant to ascertain if a tenant failed to pay their tenant portion of rent in the prior assisted program.

### **HCV Administrative Plan**

1. Per HANO's response to last year's plan, we're grateful to hear that the time period to respond before being purged from a wait list was extended to 30 days, however that change is still not updated in the current or draft plans (pg. 5-3 in the 2022 Admin Plan). We urge HANO to formally adopt the 30-day change and to use text messages and email communication to confirm whether people will remain on the wait list.

**HANO Response:** HANO did extend the time for responding to the wait list purge per the PHA Annual Plan for fiscal year beginning October 1, 2021. HANO will upload the last draft of the HCV Administrative Plan that captures this language on page 5-3. The language reads as follows:

*Families that do not respond to a request for updated information within 30 calendar days from the date of the notice will be withdrawn from the waiting list without further notice. If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.*

*If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. If the family fails to respond within 30 calendar days, the family will be removed from the waiting list without further notice.*

2. LaFHAC requests that HANO spell out in clear language HANO's plans for enforcing the criminal records policy and exactly what will be required of developers moving forward for all new developments on HANO land, with PBVs, or receiving any other HANO assistance. In response to our concerns about these developments, HANO responded on page 58 of the 2022 Annual Plan, saying "it is our position that PBV contractors that also have tax credits will be required to follow LHC criminal background policy and that new mixed income properties developed after October 1, 2022 will fall under the new policy." The LHC has already established that LIHTC recipients must follow its new inclusive tenant screening policy, so the first half of this statement is somewhat irrelevant. The second half of the statement about "new mixed-income properties" is extremely helpful because it would apply to the hundreds of units HANO is bringing online in partnership with private developers over the next few years, on its scattered sites. Unfortunately, that policy is not included in any of the draft plans—it appears to only exist as a comment back to LaFHAC in the 2022 plan. We encourage HANO to add this to their Admin Plan, and any other relevant plans, and explicitly state that it covers all properties with PBVs, on HANO land, or with any other HANO assistance.

**HANO Response:** HANO will not be requiring PBV contractors to adhere to HANO's Criminal Background Policy at this time. However, we will be evaluating to consider for future policy changes.

3. LaFHAC continues to ask HANO to consider implementing a reentry preference for formerly incarcerated individuals who frequently struggle to find safe, affordable housing in New Orleans. In our previous comments we outlined how HUD has focused significant attention on the

barriers to housing for people with criminal records and that in many cases people with criminal records are covered by the Fair Housing Act because of the same disparate impact principle that affords coverage to many survivors of domestic violence.

HANO responded saying they do not support this request because it would “move formerly incarcerated individuals above residents without any criminal background.” This response fails to understand a preference for people with criminal records as a homelessness prevention policy. Formerly incarcerated people are almost 10 times more likely to be homeless than the public. 2 Rather than making what sounds like moral judgments about applicants, we would urge HANO to use its preferences to focus on its goal to house people with the highest needs and who might otherwise end up on the street. With those goals in mind, people with criminal records should surely qualify for preference.

**HANO Response:** HANO continues its position that incorporating and implementing a reentry preference for the formerly incarcerated would move formerly incarcerated individuals above families with children who are without any criminal background which HANO does not support. Many of our residents, many of whom are families with children, have been waiting for years for affordable housing as applicants on the Housing Choice Voucher (HCV) and Public Housing waiting lists.

4. We urge HANO to reconsider its decision to exclude nonworking cooling systems during peak heat days from its list of emergency violations. HANO’s reasoning that contractors are not available to make 24-hour repairs is not one that seems to be applied uniformly. During the rare winters when temperatures drop below freezing, heating repair people are also at a premium and often not available in 24 hours.

High heat days also present far worse health hazards than lack of heat in the winter and should be treated as such. Under the existing time standards for repairs, any repair that is deemed non-emergency allows 15 calendar days for repair (pg. 10-7). There should be no question after the aftermath of Hurricane Ida that this time frame is far too long and poses an immediate threat to life, health, and safety of HANO residents. This is especially true for young children and elderly adults, which make up a disproportionate share of HANO residents.

If HANO is unwilling to require repairs in 24 hours, we suggest creating a new tier in “10.5 Time Standards for Repair” that categorizes lack of operating air conditioning during a National Weather Service heat advisory as requiring repair in 48 hours to appropriately addresses these potentially deadly living conditions.

**HANO Response:** The HCV Administrative Plan, in accordance with HUD’s HQS inspection protocols, contains provisions for participant families, landlords, and other stakeholders to request special inspections because of problems identified between annual inspections. Under HUD HQS protocol, cooled air is not a requirement, but if the Landlord provides, it must operate as designed. If the cooled air is not operating as designed, a landlord will have an initial 30 days to make repairs. HANO will continue to follow HUD HQS protocol where cooled air is not a requirement.



5. Though major mold is listed as a life threatening/emergency condition in the Housing Quality Standards, LaFHAC's Mobility Team reports problems with reporting and treating mold in client's units. The team further reports that they have been informed repeatedly that they are not to report or say "mold" to HANO staff, and HANO has stated that their inspections contractor is not capable of testing housing units for mold. Mold in housing is widespread across New Orleans, poses immediate and highly dangerous health threats for those who breathe it, and mold poses hazardous safety conditions with the likelihood of walls or ceilings collapsing or floors falling in. LaFHAC urges HANO to work with stakeholders to craft an inspection standard around mold or to follow the lead of the City Council's recent Healthy Homes Ordinance and create a standard related to dampness or deterioration in the walls or interior portions of the unit. In either case, HANO should educate residents and advocates on how to report such conditions.

**HANO Response:** HANO inspection standards are in accordance with HUD HQS guidelines. These guidelines provide that major mold which is mold; that is covering more than 9 square feet is an emergency deficiency and must be cured within 24 hours. For mold that is less than 9 square feet, HUD HQS protocol gives a landlord 30 days to correct. HANO does educate residents on requesting inspections due to mold or other issues.

6. We're grateful that HANO reviewed its disability definitions and now uses a more inclusive definition of a disability under the Fair Housing Amendments Act throughout its plans. Still, HANO continues to use a definition that excludes people "whose disability is based solely on drug or alcohol dependence (for low- income housing eligibility purposes)" (pg. 228). This statement also appears in the Eligibility Appendix. Under the Fair Housing Act, passed alcohol or substance use disorder may be considered a disability, especially if the tenant has undergone intervening treatment and is in recovery. We are concerned that carving out a certain subsection of people with disabilities for ineligibility may violate fair housing laws and make vulnerable populations with legitimate disabilities at increased risk of homelessness. We continue to suggest removal of this language.

**HANO Response:** As stated in 2022, HANO's definition of "person with disabilities" found on page 228 in the HCV Administrative plan is in accordance with your recommended definition as we already use 42 USC 423 and 42 USC 6001. HANO has also consulted outside counsel to ensure that we are compliant with fair housing rules and HUD Notice of Funding Availability. After consultation with outside counsel, we believe that our definition is in accordance with all fair housing regulations. On page 228 of the HCV Admin Plan, HANO provides that it utilizes 42 U.S.C. 423 for a person with disabilities which you have cited as appropriate to use. HANO also utilizes 42 U.S.C. 6001 for a person defined with a developmental disability. HANO further includes persons who are determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long- continued and indefinite duration, substantially impedes the ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for people with disabilities means an "individual with handicaps" as defined in 24 CFR 83. HANO also details that definitions do not exclude people who have AIDS or conditions arising from AIDS but does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes).

7. Last year, LaFHAC requested that HANO include language in the HCVP Administrative Plan that “an arrest record alone will not be used for lease termination” in accordance with HUD guidance. The critical language already existed in the ACOP, and we once again request that this language is mirrored exactly in the HCVP Administrative Plan. Presently the HCVP Plan states “HANO will terminate assistance if a preponderance of the evidence indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted” on page 19-6, and we urge you to include the exact language that “an arrest record alone will not be used for lease termination” for clarity and tenant protection.

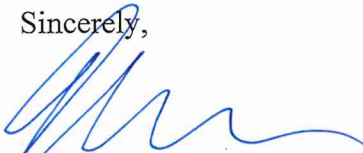
**HANO Response:** HANO will modify language in the HCV Administrative Plan detailing that an arrest alone cannot be used as proof of criminal activity.

8. LaFHAC is concerned by the draft changes to the occupancy standards in the plan that force voucher families to seek units with separate bedrooms for children of opposite genders, even if they are under 5 years old (pg. 20). This change may force families with small children to seek larger units, which our Mobility Team reports are significantly more difficult to find, especially with a voucher. We fear that this will reduce options for these families, increase their search times, and ultimately reduce their access to a unit.

**HANO Response:** HANO changed occupancy standards to provide more flexibility to families. Upon request, families may waive the occupancy standard if they have difficulty finding larger units.

Thank you for your ongoing support in addressing these important housing and community development issues. Should you have questions or need additional information, I can be reached at (504) 670-3269.

Sincerely,



Evette Hester  
Executive Director





June 27, 2023

Laura Tuggle  
Executive Director  
Southeast Louisiana Legal Services  
1340 Poydras, St. Suite 600  
New Orleans, Louisiana 70112

Dear Ms. Tuggle:

The Housing Authority of New Orleans appreciates receiving comments from the Southeast Louisiana Legal Services (SLLS) regarding HANO's Annual PHA Plan. We look forward to a continued collaboration with your organization as we work to provide affordable housing opportunities for New Orleans residents. Our responses to your comments are captured below.

#### **PHA Annual Plan**

SLLS appreciates HANO's ongoing acknowledgment of the severe affordable housing shortage facing New Orleans tenants, including a shortage of units that will accept Section 8 Housing Choice Vouchers. HANO's commitment to developing new affordable housing, incentivizing landlord participation in the HCV program, and remediating the affordable housing crisis, sets HANO apart from many other area PHAs. SLLS is pleased to see that HANO is pursuing a CNI grant for the Marrero Commons community, and that HANO is looking to PBV properties as replacement units for displaced tenants. In other jurisdictions we repeatedly see PHAs relying on HCVs as replacement housing for displaced tenants when modernization or repositioning projects occur. This is not a viable solution in markets like ours where there is a shortage of participating HCVP units and no source of income protection. Reliance on HCVP frequently results in displacement of tenants from the jurisdiction and/or restriction of tenants to equally or more segregated and higher poverty areas of the City. SLLS urges HANO to continue to consider non-HCVP solutions to displacement as it moves forward with development and modernization activities throughout its inventory.

**HANO Response:** We would like to discuss this matter further to ensure that we understand your request. However, please note that when tenant relocation is necessary, HANO finds the most feasible option which may include providing an HCV voucher, but HANO also allows tenants to find options outside of public housing and HCV units.



### **CFP Five-Year Action Plan**

SLLS is happy to see HANO's plans for capital improvements to HANO-owned and operated sites, and the inclusion of relocation funds in the budget. SLLS looks forward to working with HANO to ensure that any necessary temporary relocation of public housing tenants goes smoothly and in accordance with the requirements of 24 C.F.R. §905.308(9).

**HANO Response:** HANO is pleased to work with SLLS and other partners to ensure fair and equitable relocation of our public housing tenants.

### **ACOP**

**Section 2.1 (pg. 19 of redlined draft):** We recommend that HANO keep records for three years *or* until the end of the participant's tenancy, whichever is longer. It is problematic to purge a tenant file before the end of the tenancy, where a tenant remains in an assisted unit for more than three years. For example, if HANO or its agent takes adverse action against a tenant, the tenant is entitled to review all relevant documents in their file, which may include documents from earlier in their tenancy. HANO or its agent could find out that the participant failed to report income four years ago, and then the tenant would need to be able to search through documents submitted to the agency at that time in order to defend her case. If those documents are purged after three years, the tenant cannot adequately defend the adverse action, and HANO or its agent cannot comply with regulatory file review requirements. Moreover, certain items in the list seem to have been copied from the HCVP Administrative Plan but do not actually apply to the public housing program, such as the HAP contract. We recommend that HANO add to the list of retained documents (1) security deposit confirmation, if one exists, (2) all owner certifications of program compliance, and (3) all contemporaneous case notes.

**HANO Response:** HANO keeps records three years after a participant's tenancy. We do not purge tenant records prior to the end of tenancy. As stated in ACOP, "to the extent permitted by federal or state requirements, during the term of each Public Housing tenancy, and for at least 3 years thereafter".

**Section 3.5.6 (pg. 26 of redlined draft):** This section states that a TTY telephone service provider provides accessibility for the hearing impaired. However, this does not address accessibility for in-person meetings at HANO. HANO should provide a certified ASL interpreter, or similar accommodation, for deaf and hearing-impaired participants to be able to attend in-person meetings in compliance with the Americans with Disabilities Act.

**HANO Response:** Under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, HANO as a recipient of HUD financial assistance, does have the legal obligation to take appropriate steps to ensure effective communications with individuals with disabilities. As part of the effective communication requirement, if requested HANO will provide interpretive services for an interview, meeting, or hearing upon request. HANO has incorporated this language into ACOP.

**Section F (pg. 39-41 of redlined draft):** This section on tenant screening states that HANO and its agents will consider “rent paying habits,” “the applicant’s past performance in meeting financial obligations especially rent,” and eviction records. Specifically, “HANO or its Agents will determine if the applicant was chronically late with rent payments, was evicted at any time during the past 12 months for nonpayment of rent, or had other legal action initiated against him/her for debts owed. Any of these circumstances could be grounds for an ineligibility determination.” This screening criteria is unreasonably harsh and illogical. The fact that a tenant has rent debt, an eviction record, or inconsistent rent paying habits when renting on the private market has no bearing on the tenant’s ability or likelihood to pay rent timely in subsidized housing. Tenants need subsidized housing *because they cannot afford rent on the private market*. Many of our clients and HANO participants survive at 30% of Area Median Income. The rent affordable for someone at 30% of AMI in 2022 was \$614. But the two-bedroom fair market rent was over \$1,000.<sup>1</sup> To afford the two-bedroom fair market rent a worker would have to make over \$20 per hour, but our clients all too often make minimum wage of \$7.25. There is a reason why our clients may have a poor rental history- they cannot afford housing on the private market, which is exactly why they need a subsidy. The ACOP should be amended to clearly state that an applicant will not be penalized in admissions for rent debt, poor rent paying habits, or nonpayment evictions that occurred when they were rent burdened on the private rental market, as it has no logical bearing on their ability to comply with public housing rules and their lease agreement.

**HANO Response:** HANO’s review of rent payment habits are limited in its scope. HANO reviews the history of payments in two circumstances:

- 1) when admitting to market rate units; and
- 2) when a publicly assisted tenant is requesting admission to another program (public housing to HCV). Payment history is relevant to ascertain if a tenant failed to pay their tenant portion of rent in the prior assisted program.

**Rent Paying Habits (pg. 41 of redlined draft):** SLLS appreciates the inclusion of the following language: “The Signature Communities, at a minimum, will apply the same screening criteria set forth for residents applying for or living in HANO’s conventional public housing units.” SLLS and other advocates have long advocated for increased HANO oversight over Signature Communities and a requirement that Signature Communities comply with all tenant screening requirements in the ACOP. This line should be moved up to the beginning of Section F so that it applies to all HANO screening requirements, not just the ones set out under “Rent Paying Habits.”

**HANO Response:** HANO agrees to move this sentence to the beginning of the screening section.

**Chapter 6, Section A (pg. 64 of redlined draft):** Some families will appreciate the edit requiring that children under five years old of opposite sex must have separate bedrooms, because they may qualify for a larger unit.



SLLS recommends that HANO define “sex” somewhere in the ACOP to ensure that families can self-identify the sex of their children and household members, versus relying on the sex assigned at birth on the birth certificate. This will ensure that families with transgender children or household members are protected by HANO policies.

**HANO Response:** For purposes of occupancy of children under five years old, HANO will base the sex of a child on the sex that was assigned on the birth certificate. However, families may request a waiver of this requirement if the family has self-identified the sex of the child.

**Zero-Income Status (pg. 95 of the redlined draft):** The ACOP has been edited to require families claiming no income to provide an IRS tax return transcript. This is confusing. The prior year’s tax return transcript will not verify whether the tenant currently has no income. If HANO mean that it will review a copy of the current year’s tax return transcript when it is filed in the future, the language should be edited to clarify this.

**HANO Response:** The intent of this language was to assess tax returns for the prior year to determine if there was in fact, income for recertification purposes.

**Chapter 89 Introduction (pg. 106 of the redlined draft):** The ACOP bars transfers (except emergency and mandatory) where a tenant participated in “criminal or any activity which results in a conviction within the last two years.” This overly restrictive policy is out of sync with HANO’s more open criminal background screening policy, and HUD fair housing guidance regarding criminal convictions. This provision should be edited to align with other language in the ACOP and public housing regulations. SLLS suggests the following language:

- In the past two years tenant has been involved in drug related or violent criminal activity
- or other criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the housing authority, subject to individualized assessment and review of mitigating circumstances.
- The “good standing” requirement for transfers due to fear of violence on pg. 112 of the redlined draft should be similarly modified.

**HANO Response:** HANO will take your feedback under consideration.

**Processing Transfers (pg. 113 of the redlined draft):** This line is confusing and requires further explanation: “PHA/LIHTC transfers are prohibited between the conventional Public Housing units. Only Intra PHA/LIHTC unit transfers are permissible.” Does this mean that tenants residing in a dual subsidy PH/LIHTC unit may only transfer to another PH/LIHTC dual subsidy unit? If so, why?

**HANO Response:** Based on your feedback, HANO is clarifying language. New language reads, *Residents residing in PHA/LIHTC units are allowed to transfer to other PHA/LIHTC units. However, residents residing in PHA/LIHTC units who wish to transfer to conventional Public Housing units would be considered a move-out and would require new admission to the public*

*housing program. These tenants would not be required to be on the Public Housing Wait List as they were already admitted from the Public Housing Wait List to the PHA/LIHTC unit.*

**Orientation Agenda (pg. 120 of the redlined draft):** SLLS thanks HANO for including legal services as a new element in the orientation agenda for public housing tenants. SLLS encourages.

HANO to add a requirement for HANO and its agents, as well as Signature Communities, to include SLLS's contact information in notices of adverse action issued to public housing tenants.

**HANO Response:** HANO agrees to provide SLLS's contact information as a resource during orientation and will ask third party managers to provide it as well.

**Special Inspections (pg. 129 of the redlined draft):** The reference to LHFA is outdated and should be updated to Louisiana Housing Corporation.

**HANO Response:** HANO has changed Louisiana Housing Finance Agency to Louisiana Housing Corporation.

**Emergency Inspections (pg. 130 of the redlined draft):** Lack of air conditioning in the summer heat presents a serious health threat to residents. SLLS applauds HANO's addition of nonfunctioning HANO-supplied air conditioner, heat, or refrigerator as a 24-hour emergency repair for senior residents. However, seniors are not the only people vulnerable to heat-related illness and death. The Environmental Protection Agency reports that children and people with certain diseases such as cardiovascular and respiratory diseases are also especially vulnerable.<sup>2</sup> HANO should make non-functioning air conditioning an emergency condition for all participants, or at the very least expand the group from seniors to families with children and people with disabilities or cardiovascular and respiratory diseases. HANO has pushed back on SLLS's request for the inclusion of air conditioning in the 24-hour emergency repair category on the HCVP side because of the difficulty in getting a technician in 24 hours during the summer months. However, even if a technician is not available, the housing provider can take steps in 24 hours to mitigate the dangerous and health-threatening condition. For example, if a central air conditioning unit is broken, the landlord could provide a temporary window unit, air-cooling tower, or at the very least fans, to hold the tenant over until a technician can come out.

**HANO Response:** Under HUD HQS protocol, cooled air is not a requirement, but if HANO or third-party managers provide, it must operate as designed. If the cooled air is not operating as designed, an initial 30 days is given to make repairs. HANO will continue to follow HUD HQS protocol where cooled air is not a requirement.

**Chapter 11, Section A (pg. 141 of the redlined draft):** HANO lists "meets the tax credit requirements" as a condition of continued occupancy. HANO should clarify in the ACOP that a public housing tenancy can only be terminated for violations of *public housing rules*, not solely for noncompliance with tax credit requirements. Guidance from HUD clarifies this point.<sup>3</sup>



**HANO Response:** HANO has tenants that reside in units that are both public housing and LIHTC. Therefore, these tenants will need to comply with both public housing and tax credit rules for continued occupancy.

**VAWA Documentation (pg. 163 of the redlined draft):** An “or” should be placed between (2) and (3) to indicate that one of the three documents must be provided, rather than all three. This proposed edit aligns the language in the ACOP with 24 C.F.R. §5.2007(b). Is HANO removing the option of “[a]t the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant” because HANO is exercising its discretion to not allow this alternative evidence? If so why is HANO choosing to further restrict the documentation options for survivors?

**HANO Response:** HANO has reinstated the original language that replicates the language in 24 CFR 5.2007(b).

**Hierarchy of Payments (pg. 177 of the redlined draft):** This new section conflicts with Louisiana law that allows a tenant to impute their payment to a particular debt. See La Code Civ. P. art. 1864.

**HANO Response:** HANO has modified ACOP language to state that if a family owes amounts to HANO or the privately owned/managed site including past debt and tenant rent, as a condition of continued occupancy, any payment made to HANO will be applied to past due debts in the following order, unless the tenant specifies that payments should be imputed to a particular debt:

- 1) Rent
- 2) Late charge
- 3) Security deposit
- 4) Various damage charges
- 5) Pet deposit
- 6) NSF charge
- 7) Excess utilities
- 8) retro rent.

Please note that the request to impute payments to a particular debt must be in writing.

**General:** In a response to previous comments, HANO stated that PBV contractors that also receive low-income housing tax credits (LIHTC) will be required to follow the Louisiana Housing Corporation’s (LHC) criminal background policy, and that third party companies operating public housing developed after October 1, 2022 will be bound by the HANO criminal background screening policy. SLLS again urges HANO to require (1) that new PBV properties that do not fall under the LHC policy be required to comply with the HANO policy, and (2) that Signature Communities developed before October 1, 2022 be bound if and when any management or operating contract renews. Language should be added to the ACOP (regarding public housing Signature Communities) and the Administrative Plan (regarding PBV) to reflect these

requirements. In addition, HANO should require that covered public housing and PBV properties submit their tenant selection policies to HANO by a certain date to review for compliance.

**HANO Response:** At this time, HANO will not be requiring PBV contractors to adhere to HANO's Criminal Background Policy.

**General:** SLLS appreciates that HANO has reviewed its disability definitions and now uses a more inclusive definition of disability under the Fair Housing Amendments Act throughout its plans. Still, HANO continues to use a definition that excludes people "whose disability is based solely on drug or alcohol dependence." This statement also appears in the Eligibility Appendix. Under the Fair Housing Act, passed alcohol or substance use disorder may be considered a disability, especially if the tenant has undergone intervening treatment and is in recovery. We are concerned that carving out a certain subsection of people with disabilities for ineligibility may violate fair housing laws and make vulnerable populations with legitimate disabilities at increased risk of homelessness. We continue to suggest removal of this language.

**HANO Response:** HANO has consulted outside counsel to ensure that we are compliant with fair housing rules and HUD Notice of Funding Availability. After consultation with outside counsel, we believe that our definition is in accordance with all fair housing regulations. HANO includes persons who are determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long- continued and indefinite duration, substantially impedes the ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for people with disabilities means an "individual with handicaps" as defined in 24 CFR 83. HANO also details that definitions do not exclude people who have AIDS or conditions arising from AIDS but does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes).

#### **Administrative Plan**

**§ 4.13:** SLLS supports and appreciates the increase from 90 to 180 days as the standard for absence from the unit. This change will preserve housing for many participants who would otherwise be at risk of losing their subsidy due to a temporary absence.

**HANO Response:** HANO aims to preserve affordable housing for families in need.

**§ 4.14:** SLLS supports and appreciates the removal of the onerous requirement on people with disabilities to submit a new live-in aid request each year.

**HANO Response:** HANO continues to try to streamline its processes.

**§ 19.7.1 and 19.2.12:** SLLS is concerned about proposed changes to this section. First, HANO proposed to change termination for drug-related criminal activity and violent criminal activity from a discretionary termination to a mandatory one (change from "maybe" to "shall be")



terminated). The regulations do not *require* HANO to terminate for this type of criminal activity. See 24 C.F.R. § 982.553. HANO should not impose a mandatory termination requirement where there is none in the regulations. Moreover, later in the same section it states that HANO may consider alternatives and specific circumstances and choose not to terminate assistance. Therefore, the “shall” is misplaced since the described standard is discretionary. SLLS is also concerned about the inclusion of “news articles” as credible evidence of criminal activity.

News articles often get facts wrong, report one side of the story based on who is interviewed in the article and may not present a full picture of what occurred. Under this new standard, a participant could be terminated because a news article reports a shooting, and a neighbor who is angry that the participant stole her parking space erroneously or maliciously reports that the participant was involved in the shooting. This is not fair, or reasonable, and would turn HANO hearings into a “kangaroo court” where participants do not have a meaningful opportunity to defend themselves.

HANO should also clarify that an arrest alone does not prove criminal activity, in accordance with HUD’s 2016 fair housing guidance.<sup>4</sup> In response to this suggestion in the past, HANO has stated that the Administrative Plan is already clear that an arrest alone cannot be used as proof of criminal activity. However, that is not at all clear from the current language in the Administrative Plan and SLLS does not understand HANO’s reticence to add a line clarifying this point, as HANO has done in the ACOP.

SLLS *does* support the addition of specific considerations in the case-by-case analysis section and believes several additional considerations should be added. The option of removing the offender from the household as an alternative to termination is fair, reasonable, and compassionate.

SLLS suggests the following edits to this section:

HANO **may** terminate a family’s assistance if any household member, including juvenile member, has violated the family’s obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.

HANO will consider all credible evidence in determining whether prohibited criminal activity occurred. The following may constitute credible evidence, depending on the circumstances: any record of arrests and/or convictions of household members related to drug-related or violent criminal activity; any eviction or notice to evict based on drug-related or violent criminal activity; police and/or court records such as documentation of drug raids or arrest warrants. An arrest alone does not constitute proof of criminal activity. Testimony from neighbors, when combined with other corroborating factual evidence can be considered credible evidence.

In making its decision to terminate assistance, HANO may consider alternatives and specific circumstances and may, on a case-by-case basis, choose not to terminate assistance.

#### Case-by-Case analysis

HANO will consider the following three prongs in its determination to terminate assistance based on drug or violent criminal activity of a household member, including a juvenile household member:

1. Has the offender of the activity been removed from the home?
2. Does the household have a history of this type of activity?
3. Did household members contributed to the offense either willfully or by neglect?
4. Was the criminal activity related to domestic violence?
5. Was the criminal activity caused, in whole or in part, by a household member's disability?

If the offender has been removed from the home and the family does not have a history of this type of offense nor did they contribute to the offense, HANO will determine that assistance should remain.

**HANO Response:** HANO has agreed to state that we “may” terminate based on our three-pronged analysis. HANO has decided to reject the addition of a 4<sup>th</sup> and 5<sup>th</sup> prong to our analysis. HANO has also decided to remove language asking does the household have a history of “this type” of activity and will replace it with language asking does the household have a history of criminal activity. HANO will modify language in the HCV Administrative Plan detailing that an arrest alone cannot be used as proof of criminal activity.

**§ 10.4.15:** SLLS urges HANO to reconsider its decision to exclude nonworking cooling systems during peak heat days from its list of emergency violations. HANO’s reasoning is that contractors are not available to make 24-hour repairs. However, even if a technician is not available, the housing provider can take steps in 24 hours to mitigate the dangerous and health-threatening condition. For example, if a central air conditioning unit is broken, the landlord could provide a temporary window unit, air-cooling tower, or at the very least fans, to hold the tenant over until a technician can come out. The Environmental Protection Agency reports that seniors, children, and people with certain diseases such as cardiovascular and respiratory diseases are especially vulnerable to heat related death and illness.<sup>5</sup> HANO has acknowledged the risk by including a 24-hour repair requirement in the ACOP for seniors who have non-functioning air conditioning. If HANO is unwilling to require repairs in 24 hours, we echo Louisiana Fair Housing Action Center’s suggestion to create a new tier in “10.5 Time Standards for Repair” that categorizes lack of operating air conditioning during a National Weather Service heat advisory as requiring repair in 48 hours to appropriately address these potentially deadly living conditions.

**HANO Response:** The HCV Administrative Plan, in accordance with HUD’s HQS inspection protocols, contains provisions for participant families, landlords, and other stakeholders to request special inspections because of problems identified between annual inspections. Under HUD HQS protocol, cooled air is not a requirement, but if the Landlord provides, it must operate as designed.



If the cooled air is not operating as designed, a landlord will have an initial 30 days to make repairs. HANO will continue to follow HUD HQS protocol where cooled air is not a requirement.

**§ 10.4.15:** We appreciate the inclusion of “major mold” as a life threatening/emergency condition in the Housing Quality Standards. However, in practice McCright has repeatedly said that their inspectors are not capable of testing housing units for mold. In response to a citation for major mold, a landlord could simply paint over the visible mold without mitigating the health threat it causes. Mold in housing is widespread across New Orleans and poses immediate and highly dangerous health threats for those who breathe it. SLLS echoes the suggestion of the Louisiana Fair Housing Action Center that HANO work with stakeholders to craft an inspection standard around mold or to follow the lead of the City Council’s recent Healthy Homes Ordinance and create a standard related to dampness or deterioration in the walls or interior portions of the unit. In either case, HANO should educate residents and advocates on how to report such conditions.

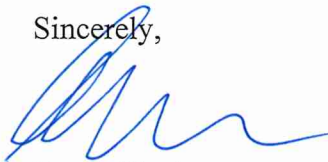
**HANO Response:** HANO inspection standards are in accordance with HUD HQS guidelines. These guidelines provide that major mold, which is mold that covers more than 9 square feet is an emergency deficiency and must be cured within 24 hours. For mold that is less than 9 square feet, HUD HQS protocol gives a landlord 30 days to correct. HANO does educate residents on requesting inspections due to mold or other issues.

**General:** SLLS staff at Family Justice Center are appreciative of HANO’s preference for survivors of domestic violence. To the extent possible, a larger allocation of vouchers is needed for this program to meet the need of survivors.

**HANO Response:** HANO is always looking for opportunities from HUD to increase our voucher allotment.

Thank you for being a needed resource for our tenants and for underserved in New Orleans. Should you have questions or need additional information, I can be reached at (504) 670-3269.

Sincerely,



Evette Hester  
Executive Director

<b>C.5</b>	<b>Troubled PHA.</b> (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y   N   N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>  (b) If yes, please describe: <b>N/A</b>
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**D. Assessment of Fair Housing (AFH) Goals and Strategies**  
Approved by HUD November 11, 2016

<b><u>Goal</u></b>	<b><u>Strategy</u></b>	<b>Fair Housing Issue</b>	<b>Contributing Factor</b>	<b>Timeframe for Action</b>	<b>Measure of Achievement</b>	<b>Responsible Program Participant(s)</b>	<b>Status</b>
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Reserve publicly owned land in high-opportunity neighborhoods for affordable housing.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	20% of qualified tax adjudicated property is made available for development through OCD, NORA, HANO NOFAs.	OCD, HANO, NORA	HANO in partnership with the New Orleans Redevelopment Authority (NORA) and the City of New Orleans Office of Community Development (OCD) reserved publicly owned land in the high opportunity neighborhoods of Tremé that were made available for development in a 2016 NOFA. Under this NOFA 30 parcels were made available resulting in 11 homeownership units and 22 rental units.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Prioritize public subsidy for development in high-opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	OCD, NORA, HANO NOFAs reflect priority in scoring for developments in high opportunity neighborhoods.	OCD, HANO, NORA, FANO	Redevelopment of up to 136 units in the Bywater area, including up to 82 affordable housing units has begun. The developer will submit at a 9% LIHTC application to the Louisiana Housing Corporation in spring 2023

<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Prioritize public subsidy for development in high-opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	OCD, NORA, HANO NOFAs reflect priority in scoring for developments in high opportunity neighborhoods.	OCD, HANO, NORA, FANO	To continue to preserve affordable units, Winn-Dixie Phase 2 is currently in pre-development. It will house 45 affordable units, including six public housing units for Iberville residents while attracting new residents to this high opportunity historic area bordering the French Quarter and Tremé.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Implement administrative streamlining policies in accordance with HUD regulations to increase landlord participation and HCV tenant mobility.	Segregation R/ECAP Disproportionate Housing	Location and type of affordable housing; Community opposition; Private Discrimination; Impediments to Mobility	1. < 1 yr < 1 yr	1. Develop streamlining policies and procedures by 2017. 2. Conduct ongoing stakeholder workshops to engage with landlords and solicit program feedback.	HANO and nonprofit partners	HANO in partnership with the Greater New Orleans Fair Housing Action Center (GNOFHAC) has conducted ongoing stakeholder workshops. HANO added streamlining procedures including the use of DocuSign and the creation of a Landlord Liaison  HANO also adjusted its policy on contract rent increase requests to ensure that owners are able to request an increase in contract rent without delay. HANO, in partnership with the Louisiana Fair Housing Action Center (LaFHAC), was awarded and has started the

							Community Choice Demonstration, which will help families with children move to areas of opportunity. The CCD will offer expedited leasing, landlord incentives for participation, and a damage mitigation fund. There is also a dedicated Leasing Coordinator position to help with landlord recruitment.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Provide rental registry landlords with information on how to become an HCV landlord to expand program participation in coordination with the City's rental registry timeline	Segregation R/ECAP Disproportionate Housing	Location and type of affordable housing; Community opposition; Private Discrimination; Impediments to Mobility	3 - 5 yrs	Decrease HCV properties in R/ECAP areas from 33% according to HUD tables to 30% by 2021 and increase HCV properties in non-R/ECAPs to 70%.	HANO	HANO's ability to participate in exchange of information related to the landlord registry is being explored.

<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Prioritize the award of Project Based Vouchers for developments in high-opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity;	Location and Type of Affordable Housing; Availability of Affordable Units in a Range of Sizes; Community Opposition	1. 3 - 5 yrs <1 yr	1. Decrease HCV properties in R/ECAP areas from 33% according to HUD tables to 30% by 2021 and increase HCV properties in non-R/ECAPs to 70% 2. Vet with HUD the possibility of issuing neighborhood-specific PBV solicitations.	HANO	1. As part of the Iberville/CNI redevelopment, 460 Project Based Voucher (PBV) units have been constructed in the high opportunity area of Tremé, along with another 15 PBV units under construction and 36 PBV units in predevelopment. The high opportunity neighborhoods of Bywater and Carrollton received PBV vouchers, 34 and 77 respectively. HUD regulations prohibit issuing neighborhood-specific PBV solicitations; however, HANO awards extra points for units located in low poverty neighborhoods.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Study the implications of Small Area Fair Market Rents and other potential Section 8 mobility	SegregationR/ECAPDisproportionate Housing Needs	Displacement of residents due to economic pressures Impediments to Mobility Location and type of affordable housing Location	1. The timeline is based on HUD issuance of final rule. 2. 1 year after	1. Review HUD proposed rule on Small Area Fair Market Rents and develop policies in adherence to HUD SAFMR rules as they are	HANO	1. HANO has established exception payment standards based on the established Small Area Fair Market Rents (SAFMRs) for eight zip codes within HANO's

	strategies.		of proficient schools Access to proficient schools for persons with disabilities Private Discrimination	implementati on of HUD rule. 1 year after implementati on of HUD rule. 4. < 1 yr	promulgated Monitor the impact of implementation on access to affordable housing within 1 years of implementation. 3. Use monitoring results to refine HANO policies/strategies as feasible to further mobility. 4. Complete feasibility study.		jurisdiction to encourage better access to areas outside of poverty concentration.  HANO received HUD's Mobility Demonstration grant which is slated for implementation in October 2022
<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Provide monetary support for local fair housing groups' education and/or enforcement programs and/or other forms of support (letters, endorsements, etc.) for local fair housing groups' fundraising efforts.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Funding included in City budget	OCD, HANO, GNOFHAC, SLLS, Advocacy Center	The New Orleans Office of Community Development awarded GNOFHAC a contract to perform a review of ESG and HOPWA policies and procedures to ensure that no discriminatory language was included within documents and to make recommendations regarding the inclusion of additional fair housing language.
<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education</b>	Expand fair housing outreach, education, and training for youth and other	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Regular training and outreach schedule developed through 2018	GNOFHAC, SLLS, Advocacy Center, Office of Neighborhood	HANO has partnered with the City to engage families at housing fairs and town hall meetings.



<b>and enforcement activities, in coordination and with fair housing organizations.</b>	targeted populations through collaboration with NORD-C, Office of Neighborhood Engagement, One Stop Shop, and HANO.					Engagement, NORD-C, CPC, HANO	
<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Increase awareness about fair housing issues, resources, and equitable outcomes through enhanced media outreach especially during Fair Housing Month each year.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Press release developed, PSAs developed, and related activities conducted	GNOFHAC, SLLS, Advocacy Center, OCD, HANO	<p>In collaboration with HUD's Fair Housing Office, HANO hosted a series of outreach workshops.</p> <p>HANO worked with the City of New Orleans to develop a PSA to acknowledge the 50th Anniversary of the passing of the Fair Housing Act of 1968.</p> <p>In 2018, HANO held a training with HUD on Reasonable Accommodations and Fair Housing. HANO staff completes a HUD Fair Housing Training annually.</p>

<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education</b>	Launch a public awareness campaign to create broad based support	Segregation/ RECAP Disproportionate Housing	Private Discrimination; Lending Discrimination; Community Opposition;	1 - 3 yrs	1. Develop 2 PSA's on fair housing. Develop informational brochures on fair housing to distribute to landlords	HANO, GNOFHAC, OCD	Status of this item is reported above.
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<b>and enforcement activities, in coordination and with fair housing organizations.</b>	for fair housing efforts by 2019.				citywide.3. Develop informational brochures to educate residents on their rights as renters.4. Develop informational brochures to educate prospective owners on their rights in the lending environment.		
<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Expand the capacity of public call centers, and HCV Case workers, public agency front desk personnel including and 311 operators to provide information on resources to address.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Trainings conducted with public call center staff; resource guide provided to public agencies	GNOFHAC, SLLS, Advocacy Center, City of New Orleans Departments, HANO	HANO has trained all HCV caseworkers and operators to provide information on housing and mobility resources.
<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Create a public awareness campaign to ensure the majority of Section 8 voucher holders are aware that they can use their vouchers to become homeowner.	Disparity in Access to Opportunity;	Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility	1 - 3 yrs	Increase the number of Section 8 homeownership closings by 10% annually through 2018	HANO	In January 2017, HANO had Completed 274 Section 8 Homeownership closings. By 2018, the closings rose to 302, a 10% increase. Closings continue to rise as follows: 2019 – 324 (+7%) 2020 – 345 (+9%) 2021 - 369 (+7%) 2022 – 392 (+6%) 2023 – 410 (+5%)

<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Increase engagement among individuals who have significant challenges in accessing safe and affordable housing.	Disproportionate Housing Needs Disparity in access to Opportunity	Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility	1. < 1 yr 2. 1 - 3 yr	1. Add HCV residents to existing resident advisory board or reconvene an HCV specific resident advisory board. Invite individuals with disabilities, prior criminal history, and LEP to participate in stakeholder workshops.	HANO	1. HANO assisted in the creation of an HCV Resident Advisory Board. 2. HANO established a Criminal Background Focus Group to provide input and assistance in developing the Agency's current criminal background policy and screening procedures.
<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Review HANO's reasonable accommodation process for HCVP and public housing tenants.	Disproportionate Housing Needs Disparity in access to Opportunity	Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility	1. ≤1 yr 1 - 3 yrs	1. HANO will provide updates to its reasonable accommodation process by 2017 to improve processes for HCVP and public housing tenants. HANO will offer bi-annual training to its employees in conjunction with this policy.	HANO	1. HANO updated its reasonable accommodation policies in the Admissions and Continued Occupancy Plan and the HCV Administrative Plan in 2017. Reasonable accommodation process was further updated according to HUD guidance in 2018.
<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in</b>	Ensure that all new HANO constructed units are built according to Section 504 accessibility standards.	Disproportionate Housing Needs Disparity in access to Opportunity	Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility	1. 1 - 3 yrs 1 - 3 yrs	1. Ensure that 5 - 15% of all new HANO constructed units are built according to Section 504 accessibility standards. Create incentives to	HANO	1. Since the November 2016 approval of the AFH Plan, HANO has constructed 759 units Of the total 759 units, 120(16%) are built according to the Section 504 accessibility

accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.					increase the number of accessible units in ( <i>Section 8 tenant-based and</i> ) project-based developments.		standards.
<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Prioritize resources to develop permanent supportive housing for persons experiencing homelessness.	Disparity in access to Opportunity	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition; Land Use and Zoning	1. < 1 yr 1 - 3 yrs	1. 10% of OCD supported units developed are PSH units. Dedicate 120 project based vouchers to the City's Cooperative Agreement to Benefit Health Initiative (CABHI) for homeless individuals.	OCD, HANO, NORA, Unity	1. The Office of Community Development is continuing to work towards having 10% of supported units designated as Permanent Supportive Housing (PSH) units. 2. In 2017 HANO entered into an MOU with the City of New Orleans and provider, Unity of New Orleans, to dedicate 120 project based vouchers for homeless individuals. The City opened a low barrier shelter in September 2018. The 24/7 shelter includes 100 beds, a living and community space, accommodations for special needs clients.

<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Implement HANO criminal background policy to integrate formerly incarcerated individuals back into the community.	Segregation R/ECAP Disparity in access to Opportunity Disproportionate Housing Needs	Community Opposition Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility	1. < 1 yr < 1 yr	1. Begin review of formerly incarcerated applicants using new Criminal Background Policy in Summer 2016. Track implementation with reporting at 6-month intervals.	HANO	1. HANO implemented the criminal background policy in 2016 and is admitting tenants in accordance with the adopted policy. 2. HANO has tracked implementation every 6 months and posted reports on the Agency's website.
<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Provide juvenile reentry services to youth to reduce barriers to future employment, education, or housing opportunities	Segregation R/ECAP Disparity in access to Opportunity Disproportionate Housing Needs	Community Opposition Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility Lack of employment opportunities	1. < 1 yr 1 - 3yrs	1. Begin review of youth denied housing by 2017. Track implementation with reporting at 6-month intervals.	SLLS, HANO	1. As part of HANO's Juvenile Reentry Assistance Program (JRAP), HANO partnered with Southeast Legal Services to serve youth living in public housing up to age 24. 2. HANO conducted 226 informational and outreach sessions reaching over 1,500 members of the community. Approximately 20 cases were open for services. Five expungements were made.

<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Ensure fair housing and other housing resource materials are available in languages other than English.</p>	<p>Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need</p>	<p>Inaccessible government facilities or services</p>	<p>&lt;1 yr</p>	<p>Language accessibility provisions included in subrecipient grant agreements; OCD funded services available in languages other than English on City of New Orleans and HANO websites.</p>	<p>OCD, NORA, HANO</p>	<p>HANO and the City's website can be converted in various languages.</p> <p>The Office of Community Development has included in all sub-recipient grants language that states the Contractor agrees to take all reasonable actions to communicate with persons who have Limited English Proficiency (LEP) to ensure that such persons have meaningful access and an equal opportunity to participate in the program(s) and/or services.</p>
<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Identify and utilize existing bilingual and/or hire and train bi-lingual staff at public agencies.</p>	<p>Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need</p>	<p>Inaccessible government facilities or services</p>	<p>1 – 3 yrs</p>	<p>Staff identified and/or hired and trained</p>	<p>OCD, HANO</p>	<p>In addition to utilizing its bilingual staff members, HANO's HCVP Department has entered into an agreement with a certified interpreter service that offers oral interpretation upon request through a toll free 1-800 hotline for LEP individuals.</p>

<b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b>	Revise HANO's Limited English Proficiency Policy.	Disparity in Access to Opportunity;	Inaccessible government facilities or services	< 1 yr	<p>1. Ensure Spanish and Vietnamese languages are addressed in new policy by 2017.</p> <p>2. Determine if any items should be standard issuance in top 3 languages in New Orleans by 2017.</p> <p>3. Continue to provide documents in other languages upon request.</p>	HANO	<p>1-3. HANO has updated its Limited English Proficiency (LEP) and Reasonable Accommodations Policies in conjunction with the PHA Planning process. The Reasonable Accommodations policies were further updated in 2018.</p> <p>HANO also developed a Language Access Plan (LAP) and implemented the recommendations of this assessment in 2019.</p>
<b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b>	Support development of 200+ affordable rentals in underserved communities.	Disproportionate Housing Needs	<p>Availability of Affordable Units in a Range of Sizes</p> <p>Deteriorated and abandoned properties</p> <p>Lack of community revitalization strategies</p> <p>Access to publicly supported &amp; affordable housing by persons with disabilities</p>	<p>1. ≤1 yr</p> <p>2. ≤1 yr</p> <p>3 - 5 yrs</p>	<p>1. Complete redevelopment of 51 units of various sizes at Florida by 2017.</p> <p>2. Complete redevelopment of 155 units at Guste III (155 units) by 2017.</p> <p>Initiate redevelopment of 50 units at various sizes at BW Cooper (Marrero Commons) by 2021.</p>	HANO	<p>HANO has completed or planned development in the following underserved areas</p> <ol style="list-style-type: none"> <li>1. Florida - 51 units, has been completed and units are now leased. Phase 2 are in predevelopment.</li> <li>2. Guste III - 155 units completed.</li> <li>3. B.W. Cooper - CNI Planning grant awarded.</li> </ol>
<b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b>	Support development of affordable single family homes in underserved areas to support deconcentration of racial and ethnic	Segregation/ECAP Disproportionate Housing Needs	<p>Availability of Affordable Units in a Range of Sizes</p> <p>Deteriorated and abandoned properties</p> <p>Lack of community revitalization strategies</p>	<p>1. &lt;1 yr</p> <p>2. 3 - 5 yrs</p> <p>3. 3 - 5 yrs</p> <p>3 - 5 yrs</p>	<p>Develop 5 or more on-site homeownership units at the following locations: -The Estates -vacant scattered sites inventory in Lower 9th Ward- vacant scattered sites</p>	HANO	Homeownership units are no longer feasible in the current financing climate.



	concentrated areas of poverty.		Access to publicly supported & affordable housing by persons with disabilities		inventory in New Orleans East-vacant scattered sites inventory in Westbank. <i>(Actual number of homes developed dependent on financing and the housing market. Number of homes could be more or less than the target)</i>		
<b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b>	Develop new commercial sites in concentrated areas of poverty and at public housing sites to provide access to jobs, fresh food, and other quality of life amenities.	Disparity in access to opportunity;	Lack of community revitalization strategies Lack of public/private investments in specific neighborhoods Lack of employment opportunities	1. 1 - 3 yrs 2. <1 yr 3. 3 - 5 yrs 4. 3 - 5 yrs 1 - 3 yrs	1. Commercial Development at Columbia Parc with proposal to include a grocery, health clinic, & small commercial retail 2. Commercial Development at Bienville Basin with proposal to include a Yoga studio, café, & small retail 3. Study feasibility of commercial development at BW Cooper/ Marrero Commons. 4. Study feasibility of commercial development at The Estates 5. Commercial Development in Bywater utilizing scattered sites	HANO	1. At Columbia Parc, a new health clinic and K-8 charter school have been completed and a grocery store and pharmacy are in pre-development. 2. At Bienville Basin (Iberville) a Yoga studio and café have opened for business. A cemetery museum is also being planned. 3. HANO was awarded a CNI Planning grant in 2022 which will help to determine feasibility of commercial development at BW Cooper. 4. No progress. 5. No progress.

					inventory – Small scale retail		
<b>Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b>	Develop smoke free policies in accordance with HUD final rule when promulgated.	Disparity in access to Opportunity	Location of environmental health hazards	1 - 3 yrs	Implementation of HANO's Smoke-Free Policy in public housing within 18 months of HUD's publication of the final rule	HANO	HANO passed the smoke-free policy in April of 2018, conducted resident educational sessions at each affected site, and residents of all HANO-owned properties signed non- smoking lease addendums by July 30, 2018. HANO implemented the smoke-free policy at its central office facility as well as at all of its management offices as of July 30, 2018.
<b>Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b>	Conduct ongoing HQS inspections of all properties under Section 8 contracts and institute a system with the City to exempt Section 8 landlords from duplicative inspections in anticipation of the passage of a citywide Rental Registry.	R/ECAPs Disparity in access to opportunity;	Deteriorated and abandoned housing Access to publicly supported housing for persons with disabilities Location of environmental health hazards	Based on timeline for City implementation of rental registry.	1. Conduct required HQS inspections of all properties under Section 8 contract. 2. Conduct inspections in response to tenant or neighbor complaints. Institute a system with the City to exempt Section 8 landlords from multiple inspections resulting from HANO and City inspections.	HANO & City	1-2. HANO completes HQS inspections for all new HCV units and on an annual basis for existing HCV units. 2. Special HQS inspections are also conducted when complaints are received denoting unit problems. The agency outsourced inspections services which improved timeliness and efficiency.

							3. HANO, in 2020, partnered with the City of New Orleans Code Enforcement to compile and share data regarding failed HQS inspection abatements that violate the City's building codes.
<b>Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b>	Continue to implement housing health and safety standards for rehabilitation and development of publicly supported housing.	R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need	Location of environmental health hazards; Deteriorated and abandoned properties: Lack of private investment in specific neighborhoods	< 1 yr	Ongoing Monitoring and Enforcement	OCD, Code Enforcement, HANO, NORA, Health Department, Mayor's Office	<p>HANO conducts annual Housing Quality Standards inspections as part of its ongoing operations.</p> <p>HANO and its third party managers also conduct Uniform Physical Conditions Standards (UPCS) inspections annually for public housing units.</p> <p>The City inspects properties assisted with federal funds in accordance with applicable program regulations. The inspections are done on a sample basis of at least 20 percent of the units.</p>

Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.	Develop and implement a strategic plan to address environmental hazards including lead, mold, toxic waste.	R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need	Location of environmental health hazards; Deteriorated and abandoned properties: Land use and zoning laws	< 1 yr	1. Strategic Plan Developed	OCD, Code Enforcement, HANO, NORA, Health Department, Mayor's Office	HANO has updated its lead based paint policy in accordance with HUD guidelines. In the City's 2017-2021 Consolidated Plan, OCD will continue to use its lead-based policy of ensuring that every house that is rehabbed under its auspices is free from lead-based paint contamination.
					2. HANO continue annual HQS inspections for HCVP properties and annual HUD REAC inspections for Public Housing properties.		HANO completes HQS inspections for all new HCV units and on an annual basis for existing HCV units. HUD REAC inspections are generally conducted on an annual basis for public housing properties.

<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b>	Develop 400+ affordable rental units in gentrifying neighborhood of Tremé	Disproportionate Housing Needs Disparity in access to Opportunity	Displacement of residents due to economic pressures; Availability of affordable units in a range of sizes Location & type of affordable housing	1. ≤1 yr 3 - 5 yrs	1. Complete 100 housing units at Faubourg Lafitte by 2017 2. Develop 300+ Iberville CNI off-site replacement units in Treme	HANO	1. HANO completed and leased 100 senior housing units at Faubourg Lafitte. HANO is developing 51 additional units, expected to be completed by 2026  2. Through the Iberville CNI initiative, HANO has provided 535 offsite replacement units. Additional units will be developed as part of Winn Dixie Phase 2.
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<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b>	Utilize HANO scattered sites inventory in gentrifying areas to develop affordable single family homes	Disproportionate Housing NeedsDisparity in access to Opportunity	Displacement of residents due to economic pressures; Availability of affordable units in a range of sizes; Location & type of affordable housing	1 - 3 yrs	1. Develop 45 on-site homeownership units (1/3 affordable) at Faubourg Lafitte in gentrifying neighborhood of Tremé by 2018. 2. Target development of 5+ affordable single family homes utilizing HANO's scattered sites in Tremé 3. Target development of 5+ affordable single family homes utilizing HANO's vacant scattered sites in Carrollton. 4. Develop 5+ affordable single family homes utilizing HANO's vacant scattered sites inventory in Upper 9th Ward. <i>(Actual number of homes developed dependent on financing and the housing market. Number of homes could be more or less than the target)</i>	HANO	1. Faubourg Lafitte homeownership units are in pre-development. Only 24 homeownership units will be developed with 18 of the 24 being reserved for buyers at or below 80% AMI. 2. Under the Choice Neighborhoods Initiative, HANO, in partnership with the City of New Orleans and NORA, is in the pre-development phase of constructing 18 homeownership units in Tremé. 3. In the Carrollton area affordable homeowner units are being planned. 4. HANO plans to develop 5 affordable and 5 market rate homes in Bywater which is located in the 9 <sup>th</sup> Ward.
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<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b>	Protect the quantity and affordability of government-assisted rental properties.	Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures	1 - 3 yrs	Expanded Affordability Periods Implemented	OCD, NORA, HANO	<p>HANO updated its policies to capture new regulatory provisions that allow for increased affordability periods of Project Based Voucher (PBV) contracts from a maximum of 15 years to 20 years; and further allowing for additional 20 year contract extensions if requested within 24 months of expiration.</p> <p>The Office of Community Development released a Request for Information (RFI) which prioritized developments that included long term and permanent affordability periods.</p>

<b>Provide reliable, frequent, and affordable access to multiple transportation options to transit-dependent populations.</b>	Better coordinate initiatives of housing agencies (OCD, HANO, NORA) and other departments (including Public Works, Parks and Parkways, ) and agencies (RTA, Sewerage and Water Board) to ensure that investments in gentrifying neighborhoods can be paired with affordable housing.	Disparity in Access to Opportunity	Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods	1 - 3 yrs	Refine and Revise Place Based Areas; Tracking and Reporting on all CDBG funding used for non-housing investments; Continue Geographically Limited NOFAs	HANO, OCD, NORA, RTA	<p>HANO, OCD, and NORA collaborated with New Orleans Regional Transit Authority to develop a strategic mobility plan that included affordable housing near high frequency transit centers.</p> <p>In September 2018, Orleans and Jefferson parishes reinstated the Regional Ride program, which allows residents in Orleans and Jefferson parishes to buy one pass to transfer between both the New Orleans Regional Transit Authority (RTA) and Jefferson Transit (JeT) lines for the first time in more than a decade. The program grants 24-hour access for \$6 without having to buy separate passes and provides the connectivity transit riders need.</p>
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## Appendix

### ACOP and the HCV ADMINISTRATIVE PLAN

Please click [here](#) to review the redlined draft of the HCV Administrative Plan.

Please click [here](#) to review the redlined draft of the Admissions and Continued Occupancy Plan (ACOP).