

**HOUSING AUTHORITY OF NEW ORLEANS
BOARD OF COMMISSIONERS
REGULAR MEETING
MAY 21, 2013**

RESOLUTION NO. 2013-19

WHEREAS, the Housing Authority of New Orleans (HANO) is the city's major provider of affordable housing and a steward of safe and healthy communities, and has a responsibility to give men and women with criminal histories the opportunity to rejoin their families and communities as productive members; and

WHEREAS, HANO adopted a new Criminal Background Policy Statement on March 26, 2013 that provides all individuals, regardless of their criminal history, access to employment and housing opportunities at HANO; and

WHEREAS, in order to implement this new Criminal Background Policy Statement, HANO must amend and revise several of its operating policies and procedures to ensure that they are in compliance with and follow the letter and the spirit of the new policy statement; and

WHEREAS, one such document is HANO's Admissions and Continued Occupancy Policy (ACOP), which establishes the procedures and practices for admissions and continued occupancy in HANO's public housing units, whether managed by HANO or 3rd party property managers; and

WHEREAS, in consultation with the Vera Institute of Justice, HANO has proposed amendments and revisions to the ACOP related to HANO's Criminal Background Policy Statement as referenced in Exhibit A; and

WHEREAS, these proposed amendments and revisions have been reviewed with several stakeholders, including the HANO Resident Advisory Board, 3rd party property managers, criminal justice system stakeholders, and other community stakeholders, and a draft of the revised ACOP was published on the HANO website on April 25, 2013 for public comment; and

WHEREAS, these proposed amendments and revisions will ensure that HANO's public housing program is in compliance with its new Criminal Background Policy Statement;

THEREFORE, BE IT RESOLVED, that the Board of Commissioners of the Housing Authority of New Orleans adopts the amendments and revisions to the ACOP related to HANO's new Criminal Background Policy Statement summarized in Exhibit A, and authorizes the Administrative Receiver to take any and all other action necessary ensure that the ACOP is implemented in accordance with HANO's Criminal Background Policy Statement.

Executed this 21st day of May, 2013

APPROVAL:



**DAVID GILMORE
ADMINISTRATIVE RECEIVER
CHAIRMAN, BOARD OF COMMISSIONERS**

HOUSING AUTHORITY OF NEW ORLEANS
Admissions and Continued Occupancy Policy (ACOP)
Chapter 1: Introduction, Chapter 2: Eligibility for Admission, and Chapter 12: Lease Terminations

Summary of Proposed Changes by the Vera Institute of Justice
 May 14, 2013

The following table includes the: (1) proposed changes, (2) new proposed policy language, and (3) reasoning for each change.

Item No.	Section	Subsection	Proposed Change	New Proposed Policy	Rationale
1.	Introduction	N/A	<p>Eliminate the second sentence: This Admissions and Continued Occupancy Policy (the "ACOP") defines the policies of the Housing Authority of New Orleans for the operation for the Public Housing Program, incorporating Federal, State and local law.</p> <p>Notwithstanding anything to the contrary provided herein, in the event of any conflict between a provision of this ACOP and an applicable Agreement Not to Alienate for a Signature Community, an applicable Regulatory and Operating Agreement for a Signature Community, an applicable Mixed Finance ACC Amendment for a Signature Community, or any applicable agreement or management plan (which shall collectively be referred to herein as the "Other Documents"), or any applicable federal law or regulation, then the provisions of the Other Documents shall control for such Signature Community; provided, however, that in the event of a conflict between any provision of the Other Documents and any applicable federal law or regulation, then the applicable federal law or regulation shall control.</p>	<p>This Admissions and Continued Occupancy Policy (the "ACOP") defines the policies of the Housing Authority of New Orleans for the operation for the Public Housing Program, incorporating Federal, State and local law.</p>	<p>Change made to be consistent with the Regulatory and Operating Agreements.</p>

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2.	Purpose of Policy	N/A	<p>The policy's purpose is currently included in the Other Eligibility Criteria section.</p> <p>The proposed policy:</p> <ul style="list-style-type: none"> • Moves the policy's purpose from the Other Eligibility Criteria section to the Introduction section; and • Removes the following language "All federally assisted housing is intended to provide a place to live and raise families, not a place to commit crime, to use or sell drugs or terrorize neighbors." 	<p>It is the intention of the HANO and its Agents to implement a policy designed to:</p> <ul style="list-style-type: none"> • Help create and maintain a safe and drug-free community; • Keep our program participants free from threats to their personal and family safety; • Support parental efforts to instill values of personal responsibility and hard work; • Help maintain an environment where children can live safely, learn and grow up to be productive citizens; and • Assist families in their vocational/educational goals in the pursuit of self-sufficiency. 	<p>The policy's purpose applies to Chapter 2 in its entirety, and not solely to the Other Eligibility Criteria section.</p>
Other Eligibility Criteria					
3.	N/A	N/A	<p>Eliminate the following two items from "All applicants must demonstrate through an assessment of current and past behavior the ability to":</p> <ul style="list-style-type: none"> • "not to have ever been convicted of manufacturing or producing methamphetamine, known as "speed" on or off the premises"; and • "not to contain a household member subject to lifetime sex offender registration requirement under a State Sex offender registration program". 	<p>All applicants must demonstrate through an assessment of current and past behavior the ability:</p> <ul style="list-style-type: none"> • to pay rent and other charges as required by the lease in a timely manner; • to care for and avoid damaging the unit and common areas; • to use facilities, appliances and equipment in a reasonable way; • to create no health or safety hazards and to report maintenance needs in a timely manner; • not to interfere with the rights 	<p>It is difficult to demonstrate one's ability to meet these criteria. To help with clarity, HANO should keep these federal exclusions in a separate category titled Federally Barred Admissions.</p>

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				<p>and peaceful enjoyment of others and to avoid damaging the community of others;</p> <ul style="list-style-type: none"> • not to engage in criminal activity or alcohol abuse that threatens the health, safety or right to peaceful enjoyment of other residents or staff and not to engage in drug-related criminal activity on or off HANO or its Agents premises; • to comply with necessary and reasonable rules and program requirements of HUD and HANO's ACOP and Tax Credit Requirements; • and to comply with local health and safety codes. <p>Not included.</p>	
4.	Denial of Admission for Previous Debts to HANO or any other PHA or Landlord	N/A	Eliminate "DENIAL OF ADMISSION FOR DRUG-RELATED AND OTHER CRIMINAL ACTIVITY".		This statement is addressed in the new Criminal Records and for Drug and Alcohol Abuse section.
5.	Purpose	N/A	Reword and move to Introduction.	See Item No. 2, Purpose of Policy.	The policy's purpose applies to Chapter 2 in its entirety, and not solely to the Other Eligibility Criteria section.
6.	Screening for Drug Abuse and Other Criminal Activity	N/A	Rename the section.	Screening for Criminal Records and for Drug and Alcohol Abuse.	Consolidate all screening procedures and requirements for criminal records, drug abuse, and alcohol abuse into one section.
7.	Administration	N/A	Eliminate the section title and merge the language within this section into	N/A	This section applies solely to screening

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8.	Screening for Criminal Records and for Drug and Alcohol Abuse	N/A	<p>Screening for Criminal Records and for Drug and Alcohol Abuse.</p> <p>Reorganize the subsections.</p> <p><u>Current subsections</u></p> <ul style="list-style-type: none"> • Use of Law Enforcement Records • Standard for Violation • Permanent Denial of Admission • Prohibition of Persons Subject to Lifetime Sex Offender Registration Requirement • Other Criminal Activity <p>New subsection.</p>	<p><u>New subsections</u></p> <ul style="list-style-type: none"> • Screening for Criminal Record • Federally Barred Admissions • Other Criminal Records • Screening for Drug and Alcohol Abuse 	<p>procedures. The only screening procedures included in Chapter 2 are for criminal records, drug abuse, and alcohol abuse.</p> <p>Reorganized for clarity and to reduce redundancy.</p>
9.	Screening for Criminal Records and for Drug and Alcohol Abuse	Screening for Criminal Record		<p>HANO or its Agents will conduct a criminal record check for all applicants who are 18 years of age or older in the household to determine: (1) whether any member of the household is subject to a mandatory federal requirement for denial of admission, and (2) whether any member of the household has one or more criminal conviction(s) that represent a risk to the safety and well being of the community. This record check will be conducted prior to determination of final eligibility.</p> <p>For any denial based on a household member's criminal record, HANO or its Agents may permit eligibility for occupancy conditioned on the exclusion of the denied family member from residency in the unit.</p>	<p>Clarify the aspects of screening that apply to Federally barred admission and to drug and alcohol abuse.</p>
10.	Screening for	Federally Barred	New subsection.	HANO and its Agents are	Reorganized the

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	Criminal Records and for Drug and Alcohol Abuse	Admissions		<p>required by federal law to deny assistance to an applicant if any of the household members:</p> <ul style="list-style-type: none"> • Is subject to a lifetime registration requirement under a state sex offender registration program • Has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing • Has been evicted from federally assisted housing for drug-related criminal activity during the previous three years, except if one of the following occurred: <ul style="list-style-type: none"> - The circumstances leading to the eviction no longer exist. - The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program. 	<p>sections on Federally barred admissions for clarity. Changed the timeframe for evictions for drug-related criminal activity to comport with the timeframe in HUD policy. §5.854</p>
11.	Screening for Criminal Records and for Drug and Alcohol Abuse	Other Criminal Records	New subsection.	<p>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.</p> <p>For applicants not barred by federal law, the applicant's</p>	<p>Modified language to ensure ACOP is in compliance with HANO's new Criminal Background Policy Statement which was adopted on March 26, 2013.</p>

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				<p>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.</p> <p>Applicants whose conviction(s) do not suggest a significant level of risk will be deemed admissible to housing if otherwise eligible.</p> <p>Applicants whose conviction(s) suggest a significant level of risk will be reviewed by a panel of HANO officials 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 may, at its sole discretion, include external experts in the panel. If the panel recommends denial of an applicant, the HANO chief executive officer will review the recommendation and make the final decision on admission. The risk assessment criteria HANO and its Agents use and the review process are detailed in the criminal background screening procedures.</p>	<p>Provided a more specific definition for "currently engaging in the illegal use of a drug" and for alcohol abuse. These standards must be set per HUD requirements</p>
12.	Screening for Criminal Records and for Drug and Alcohol Abuse	Screening for Drug Alcohol Abuse	New subsection.	<p>In an effort to prevent drug-related criminal activity, as well as other patterns of behavior that pose a threat to the health, safety or the right to peaceful enjoyment of the premises by other residents, HANO and its Agents will endeavor to screen applicants as fairly as possible.</p>	

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				<p>HANO or its agents will screen applicants to determine whether any household member is currently engaging in the illegal use of a drug.</p> <p>A person is "currently engaging in" the illegal use of a drug when he or she has two or more convictions for drug possession in the past three months. Neither HANO nor its agents will deny admission if the household member who is currently engaging in the illegal use of a drug is enrolled in a supervised drug rehabilitation program.</p> <p>HANO or its agents will screen applicants to determine if any household members' alcohol abuse or pattern of alcohol abuse may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents. Such abuse is defined as having two or more convictions for alcohol-related offenses in the past three months. Neither HANO nor its agents will deny admission if the household member who is currently engaging in the abuse of alcohol is enrolled in a supervised rehabilitation program.</p>	<p>(§5.854, §5.857).</p>
13.	Screening for Drug Abuse and Other Criminal Activity	N/A	<p>Remove the following: In an effort to prevent drug related and other criminal activity, as well as other patterns of behavior that pose a threat to</p>	See Item No. 12, Screening for Drug and Alcohol Abuse	For clarity, HANO should separate out the screening standards for illegal use of a drug from

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			<p>the health, safety or the right to peaceful enjoyment of the premises by other residents, HANO and its Agents will endeavor to screen applicants as thoroughly and fairly as possible.</p> <p>If in the past a lease termination is initiated, which may or may not have resulted in eviction for any reason cited under the Screening and Eviction for Drug Abuse and Other Criminal Activity Notice, for a family, as a prior resident of public housing, HANO or its Agents shall have the discretion to consider all circumstances of the case regarding the extent of participation by non-involved family members.</p> <p>Initial screening will be limited to routine inquiries of the family and any other information provided to HANO or its Agents regarding this matter. The inquiries will be standardized and directed to all applicants by inclusion in the application form.</p> <p>If as a result of the standardized inquiry, or the receipt of a verifiable referral, there is indication that the family or any family member is engaged in drug-related criminal or violent criminal activity, HANO or its Agents will conduct closer inquiry to determine whether the family should be denied admission. If the screening indicates that any family member has been convicted within the prior seven (7) years for drug-related or violent criminal activity, HANO or its Agents shall obtain verification through police/court records.</p>		those for alcohol abuse.
14.	Use of Law Enforcement Records	N/A	Remove the section and following language:	See Item No. 9, Screening for Criminal Record; No. 10, Federally Barred Admissions;	Removed for the sake of clarity when reorganized

Item No.	Section	Subsection	Proposed Change	New Proposed Policy and No. 11, Other Criminal Records.	Rationale
15.	Standard for Violation	N/A	<p>HANO or its Agents will check criminal history for all applicant(s) who are 18 years of age adults in the household to determine whether any member of the family has engaged in violent or drug-related criminal activity dating back to seven (7) years.</p> <p>HANO or its Agents will check criminal history for all applicants who are 18 years of age and all adults in the household to determine whether any member of the family is subject to a lifetime sex offender registration requirement.</p> <p>Verification of any past criminal activity will be done prior to final eligibility and will include a check of conviction records.</p> <p>Remove the section and following language:</p> <p>Persons evicted from public housing, Indian housing, Section 23, or any Section 8 program because of drug-related criminal activity are ineligible for admission to Public Housing for a five-year period beginning on the date of such eviction.</p> <p>HANO and its Agents will admit the household if determine the following:</p> <p>The circumstances leading to the eviction no longer exist. For example, the individual involved in drugs is no longer in the household because the person has died or is imprisoned.</p> <p>No member of the applicant's family may have engaged in drug related or violent criminal activity within the past seven (7) years.</p>	Not included.	For clarity, HANO should separate out sections on illegal use of a drug from those about alcohol abuse.

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			<p>HANO or its Agents will deny participation in the program to applicants where Management determines there is reasonable cause to believe that the person is illegally using a controlled substance or engages in drug-related or other criminal activity in addition convictions. The same will apply if it is determined that the person abuses alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents. This includes cases where HANO or its Agents determine that there is a pattern of illegal use of controlled substances or a pattern of alcohol abuse.</p> <p>"Engaged in or engaging in or recent history of" drug-related criminal activity means any act within the past seven (7) years by applicants or participants, household members, or guests which involved drug-related criminal activity including, without limitation, drug-related criminal activity, possession and use of narcotic paraphernalia, which did or did not result in the arrest and/or conviction of the applicant or participant, household members, or guests.</p> <p>"Engaged in or engaging in or recent history of" criminal activity means any act within the past seven (7) years by applicants or participants, household members, or guests which involved criminal activity that would threaten the health, safety or right to peaceful enjoyment of the public housing premises by other residents or employees of HANO or its Agents which did or did not result in the arrest and/or conviction of the</p>		

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			<p>applicant or participant, household members or guests.</p> <p>HANO or its Agents will waive the requirement regarding drug-related criminal activity if:</p> <p>The individual involved in drug-related criminal activity is no longer in the household because the person is incarcerated for a term or more than (7) seven years.</p> <p>HANO or its Agents may permit eligibility for occupancy and impose conditions that the involved family member(s) does not reside in the unit. Evidence will be consider which proves that the person is no longer in the household such as divorce decree/incarceration/death/copy of a new lease with the owner's telephone number and address/or other substantiating evidence.</p>		
16.	Permanent Denial of Admission	N/A	<p>Remove the section and following language:</p> <p>HANO or its Agents will permanently deny admission to persons convicted of manufacturing or producing methamphetamine on the premises of the assisted housing project in violation of any Federal or State law. This requirement will not be waived.</p>	See Item No. 10, Federally Barred Admissions.	Moved to a different section.
17.	Prohibitions on Persons Subject to Lifetime Sex Offender Registration Requirement	N/A	<p>Remove the section and following language:</p> <p>HANO or its Agents will deny admission to housing to any family in which a family member is subject to a lifetime sex offender registration requirement. This provision cannot be waived. HANO or its</p>	See Item No. 10, Federally Barred Admissions.	Moved to a different section.

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18.	Other Criminal Activity	N/A	<p>Agents shall perform necessary nationwide criminal history background checks in addition to the State where the housing is located.</p> <p>Remove the section and following language:</p> <p>"Other criminal activity" means a history of criminal activity involving crimes of actual or threatened violence to persons or community, or a history of other criminal acts, conduct or behavior, which would adversely affect the health, safety, or welfare of other residents.</p> <p>For the purposes of this policy, this is construed to mean that a member of the current family has been arrested or convicted of any criminal or drug-related criminal activity within the past seven (7) years. HUD defines violent criminal activity as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or community, and the activity is being engaged in by any family member.</p> <p>Applicants and/or their household members who have been convicted of criminal sexual conduct, including but not limited to sexual assault, incest, statutory sexual seduction, open and gross lewdness, or child abuse, and are required by law to register as a sex offender will be prohibited from participation in the public housing program.</p> <p>No family member may have engaged in or threatened abusive or violent behavior toward HANO or its Agents personnel at</p>	See Item No. 11, Other Criminal Records.	Reorganized for clarity.

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19.	Evidence	N/A	<p>any time within the past seven (7) years. No family member may have committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program in the last seven (7) years.</p> <p>Remove the section and the following language:</p> <p>There must be evidence of the violation.</p> <p>"Preponderance of evidence" is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.</p> <p>The intent is not to prove criminal liability, but to establish that the act(s) occurred.</p> <p>Preponderance of evidence is not to be determined by the number of witnesses, but by the greater weight of all evidence.</p> <p>"Credible evidence" may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence, can be considered credible evidence. Other credible evidence includes documentation of drug raids or arrest warrants, evidence gathered by HANO or its Agents inspectors and/or investigators, as well as evidence gathered from HANO's or its Agent's Hotline.</p> <p>HANO or its Agents may pursue fact-finding efforts as</p>	Not included	This refers to violation terminology which has been removed so this definition is no longer pertinent in the admissions chapter.

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			needed to obtain credible evidence.		
Screening for Suitability					
20.	N/A	N/A	Remove the following language: Criminal background checks including a National Data Base search for State Sex offender and Lifetime registrant.	Not included.	This was already addressed under Federally Barred Admissions.
21.	N/A	N/A	Remove criminal records from list of factors to be considered in the screening process.	Factors to be considered in the screening are housekeeping habits, rent paying habits, prior history as a resident, the ability of the applicant to maintain the responsibilities of tenancy, and whether the conduct of the applicant in present or prior housing has been such that admission to the program would adversely affect the health, safety or welfare of other residents, or the physical environment, or the financial stability of the project.	Criminal records are included as part of the Screening for Eligibility.
22.	N/A	N/A	Remove the following items from the list of relevant information pertaining to past and current habits or practices to be examined: Any history of criminal activity on the part of any applicant family member involving criminal acts, including drug-related criminal activity; Any history of alcohol or substance abuse that would threaten the health, welfare, or right to peaceful enjoyment of the premises by other residents.	Examination of relevant information pertaining to past and current habits or practices will include, but is not limited to, an assessment of: The applicant's past performance in meeting financial obligations especially rent; Eviction or a record of disturbance of neighbors sufficient to warrant a police call, destruction of community, or living or housekeeping habits at	Criminal activity, alcohol abuse, and substance abuse are included as part of the Screening for Eligibility.

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23.	Screening Applicants Who Claim Mitigating Circumstances	N/A	<p>Remove "See" from the following language:</p> <p>Mitigation of disqualifying information for victims of domestic violence, dating violence or stalking will be considered when negative reporting is the consequences of domestic violence, dating violence or stalking. Any inquiries related to the mitigation circumstances must be remain confidential. See</p> <p>Remove the following items from the list of pertinent information the Housing Authority or its Agents shall document:</p> <p>Criminal Activity - includes the activities listed in the definition of criminal activity in this Chapter.</p> <p>Pattern of Drug Use - includes a determination by HANO or its Agents, that subject to verifiable documentation, that</p>	<p>present or prior residences which may adversely affect the health, safety, or welfare of other residents or neighbors;</p> <p>Any history or evidence of repeated acts of violence on the part of an individual, or a pattern of conduct constituting a danger to peaceful occupancy by neighbors;</p> <p>Any history of initiating threats or behaving in a manner indicating intent to assault employees or other residents.</p>	Incomplete sentence.
24.	Document Findings	N/A	<p>Not included.</p>	<p>Mitigation of disqualifying information for victims of domestic violence, dating violence or stalking will be considered when negative reporting is the consequences of domestic violence, dating violence or stalking. Any inquiries related to the mitigation circumstances must be remain confidential.</p>	Definitions are provided in earlier sections on Screening for Eligibility.

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			<p>the applicant has exhibited a pattern of illegal use of a controlled substance, which might interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p><u>Drug-Related Criminal Activity</u> - includes a determination by HANO or its Agents that the applicant has been involved in the illegal manufacture, sale, distribution, use or possession of a controlled substance.</p> <p><u>Pattern of Alcohol Abuse</u> - includes a determination by HANO or its Agents that the applicant's pattern of alcohol abuse might interfere with the health, safety or right to peaceful enjoyment of the premises by other residents. Verification will include, but not be limited to, police reports, landlord reports, and rental history.</p>		
Chapter 12: Lease Terminations					
25.	Notification Requirements	C. Criminal Activity	<p>Add the following sentence: Criminal activity that occurred prior to admission cannot be grounds for eviction.</p>	<p>HANO and its Agents will immediately terminate tenancy of persons convicted of manufacturing or producing methamphetamine on the premises of the assisted housing project in violation of any Federal or State law. "Premises" is defined as the building or complex in which the dwelling unit is located, including common areas and grounds. HANO and its Agents will terminate assistance of participants in cases where it's determines</p>	<p>Need to clarify that criminal activity that happened prior to someone being admitted will not be grounds for eviction.</p>

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				<p>there is reasonable cause to believe that the person is illegally using a controlled substance or engages in drug-related or other criminal activity.</p> <p>The same will apply if it is determined that the person abuses alcohol in a way that interferes with the health, safety or right to peaceful enjoyment of the premises by other residents.</p> <p>This includes cases where HANO and its Agents determine that there is a pattern of illegal use of controlled substances or a pattern of alcohol abuse.</p> <p>Criminal activity that occurred prior to admission cannot be grounds for eviction.</p> <p>"Engaged in or engaging in or recent history of" drug related criminal activity means any act within the past 7 years by applicants or participants, household members, or guests which involved drug-related criminal activity including, without limitation, drug-related criminal activity, possession and/or use of narcotic paraphernalia, which did or did not result in</p>	

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				<p>the arrest and/or conviction of the applicant or participant, household members, or guests.</p> <p>"Engaged in or engaging in or recent history of" criminal activity means any act within the past 7 years by applicants or participants, household members, or guests which involved criminal activity that would threaten the health, safety or right to peaceful enjoyment of the public housing premises by other residents or employees of HANO or its Agents, which did or did not result in the arrest and/or conviction of the applicant or participant, household members, or guests.</p>	



May 21, 2013

MEMORANDUM

**To: David Gilmore
Administrative Receiver
Chairman, Board of Commissioners**

**From: Maggie Merrill
Senior Advisor to the Administrative Receiver**

**Re: Amendments to HANO's Admissions and Continued Occupancy Policy
related to HANO's New Criminal Background Policy**

As the city's major provider of affordable housing and a steward of safe and healthy communities, the Housing Authority of New Orleans (HANO) has a responsibility to give men and women with criminal histories the opportunity to rejoin their families and communities as productive members. To that end, HANO adopted a new Criminal Background Policy Statement on March 26, 2013 that provides all individuals, regardless of their criminal history, access to employment and housing opportunities at HANO. Since that time, HANO has been working with the Vera Institute of Justice ("Vera") to implement the new policy statement.

In order to implement this new Criminal Background Policy Statement, HANO must amend and revise several of its operating policies and procedures to ensure that they are in compliance with the letter and the spirit of the new policy statement. One such document is HANO's Admissions and Continued Occupancy Policy (ACOP), which establishes the procedures and practices for admissions and continued occupancy in HANO's public housing units, whether managed by HANO or 3rd party property managers. In consultation with Vera, HANO has proposed changes to the ACOP related to the new Criminal Background Policy Statement and has reviewed the changes with several stakeholders, including the HANO Resident Advisory Board, 3rd party property managers, criminal justice system stakeholders, and other community stakeholders. In addition, a draft of the revised ACOP was published on the HANO website on April 25, 2013 for public comment. All proposed amendments and revisions to the ACOP have been summarized and are attached hereto as Exhibit A.

The Board of Commissioners is hereby requested to adopt the amendments and revisions to the ACOP related to HANO's new Criminal Background Policy Statement summarized in Exhibit A, and to authorize the Administrative Receiver to take any and all other action necessary to ensure that the ACOP is implemented in accordance with HANO's Criminal Background Policy Statement.