



CITY OF NEW ORLEANS



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**I. Cover Sheet**

1. Submission date: **October 4, 2016**

2. Submitter name: **City of New Orleans and Housing Authority of New Orleans**

3. Type of submission (e.g., single program participant, joint submission): **Joint Submission**

4. Type of program participant(s) (e.g., consolidated plan participant, PHA): **Consolidated Plan participant and PHA participant**

5. For PHAs, Jurisdiction in which the program participant is located: **New Orleans, LA/Orleans Parish**

6. Submitter members (if applicable): **N/A**

7. Sole or lead submitter contact information:

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- b. Title: **Director of Housing Policy and Community Development**
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- d. Street address: **1340 Poydras Street – 10th Floor**
- e. City: **New Orleans**
- f. State: **LA**
- g. Zip code: **70112**

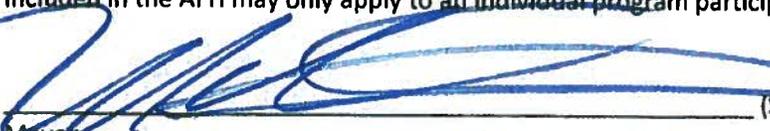
8. Period covered by this assessment: **2017 - 2021**

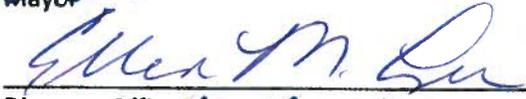
9. Initial, amended, or renewal AFH: **Initial**

10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

  
\_\_\_\_\_  
Mayor (Signature) 10-4-16 (Date)

  
\_\_\_\_\_  
Director, Office of Community Development (Signature) 09/30/16 (Date)

  
\_\_\_\_\_  
Executive Director, Housing Authority of New Orleans (Signature) 9/30/16 (Date)

12. Departmental acceptance or non-acceptance:

\_\_\_\_\_  
(Signature) \_\_\_\_\_ (Date)

## **II. Executive Summary**

In 2015 the U.S. Department of Housing and Urban Development (HUD) released a final rule, revamping and the process by which certain federal grantees demonstrate that they are affirmatively furthering the purposes of the Fair Housing Act. In response to the regulation, 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.

In developing the AFH Plan, the City and HANO, along with partner organizations and residents, were guided by the PolicyLink philosophy of equity that is defined as “just and fair inclusion into a society in which all can participate, prosper, and reach their full potential.” More specifically, the City and HANO stressed the equity principles below throughout the planning process.

### **Equity Guiding Principles**

- Equity – AFH participants recognize the important role affordable housing plays in promoting equity, and the overall importance of helping low- and moderate-income New Orleanians, including people of color, persons with disabilities, and families with children, build financial stability and live in thriving communities with linkages to jobs and transportation.
- Collaboration – The City and HANO acknowledge that they alone cannot meet the growing need for affordable housing and community assets in New Orleans. They will need support from committed local, state, and federal partners, including for profit, nonprofit, and governmental entities. In particular, collaboration between the City, the New Orleans Redevelopment Authority (NORA), HANO, and the Finance Authority of New Orleans (FANO) will be critical to meeting unmet needs.
- Openness – The AFH Plan seeks to create transparent accountability for all initiatives by connecting proposed activities to metrics and milestones. The AFH Plan builds on the extensive, community-based work already completed through *HousingNOLA 10 Year Strategy and Implementation Plan*, *Housing for a Resilient New Orleans*, and NORA’s Rental Housing Report, which all document the state of housing within the city, noting challenges and providing recommendations for overcoming barriers.

With these equity guiding principles at the forefront of the planning process, the City and HANO were able to analyze data that gave a clear picture of segregation; racially/ethnically concentrated areas of poverty; disparities in access to jobs, proficient schools, transportation; and disproportionate housing needs in New Orleans. The AFH Plan discusses these barriers to fair housing, as well as the fair housing enforcement and outreach infrastructure in New Orleans, and identifies contributing factors that have a causal relationship to those fair housing issues. The City and HANO found a number of contributing factors through the process of developing the AFH Plan. Factors such as community opposition to the placement of affordable housing, lack of public or private investment, zoning and land use laws, and

economic pressures, among many others, contribute to fair housing issues. Identifying contributing factors was integral to crafting specific goals for affirmatively furthering fair housing.

### **Summary of Goals**

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 & 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.

The AFH Plan is consistent with the City's *Housing for a Resilient New Orleans* plan, which sets the goal of building or preserving 7,500 affordable housing units by 2021. The City and HANO also understand that, in order to lay the foundation for efforts to affirmatively further fair housing, the AFH Plan must address more than affordable housing and discrimination on the basis of race and national origin. The AFH Plan must also identify other barriers to access to opportunity and address factors contributing to those disparities. To accomplish a more in-depth look at these issues, the AFH Plan considered the existing *HousingNOLA* Plan, which provided a data framework that addressed a number of issues that create barriers to housing and opportunity in New Orleans. In addition, the City and HANO also referred to the *HANO PHA Plan* and the *City of New Orleans Consolidated Plan* in conducting the analysis and formulating the goals within the AFH Plan.

The AFH Plan is designed to facilitate efforts to affirmatively further fair housing by working towards a mission of ensuring that everyone who calls New Orleans home is able to access similar opportunities without being burdened by substantial barriers.

### **III. Community Participation Process**

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

HANO and the City undertook a number of activities to broaden and encourage meaningful community participation. Steps that were taken to ensure meaningful community participation are as follows:

#### **Stakeholders List**

HANO and the City developed a large list of over 100 stakeholders and grouped them by specialty area (See Appendix A – Stakeholder Engagement List). HANO and the City invited stakeholders to assist the HANO/OCD team in outreach efforts by providing data and information to their constituents and gathering feedback on a number of AFH topics. Stakeholders were grouped into the following categories:

Housing	Neighborhood Groups
Social Services	Zoning/Urban Planning
Advocacy/Criminal Justice	Transportation
Economic/Jobs/Employment	Persons with Limited English Proficiency
Resident Advisory Board	Public Officials

#### **Stakeholder Meetings**

The City and HANO scheduled a number of stakeholder meetings during the course of the development of the AFH Plan. There were three types of stakeholder meetings: general stakeholder public meetings, stakeholder capacity building sessions, and stakeholder planning group meetings. General stakeholder meetings were open to the public and included information gathering and sharing as well as breakout sessions. The City and HANO coordinated with the Greater New Orleans Fair Housing Action Center (GNOFHAC), which took the lead in convening the stakeholder capacity sessions. These sessions targeted smaller community-based and advocacy groups whose fair housing outreach efforts to their constituents would benefit from capacity building and training regarding the purpose and technical aspects of the AFH process. The stakeholder planning group meetings were weekly meetings of the seven partner groups that were charged with assisting in synthesizing community input, guiding research, and identifying and

addressing gaps in data. These seven groups were the City of New Orleans Office of Community Development, HANO, GNOFHAC, PolicyLink, Lawyers’ Committee for Civil Rights Under Law, Greater New Orleans Housing Alliance (GNOHA), and Enterprise Community Partners. Approximately 40 participants attended the general stakeholder meeting with all of the specialty areas listed above represented, and attendance at the capacity building sessions averaged 15 stakeholders.

Meeting dates were as follows:

General Stakeholder Meeting	July 6, 2016
Stakeholder Capacity Session	July 11, 2016
Stakeholder Capacity Session	July 13, 2016
Stakeholder Capacity Session	September 6, 2016
Stakeholder Capacity Session	September 7, 2016
HANO Resident Advisory Board Meeting	September 14, 2016

**Community Meetings/Hearings Open to the General Public**

Community outreach and feedback was also solicited at multiple meetings that were open to the general public including the City of New Orleans Budget meetings held in every Council district, HANO Board meetings, Resident Advisory Board (RAB) meetings, and public hearings. Meeting dates were as follows:

District A Budget Meeting	July 6, 2016
District C Budget Meeting	July 7, 2016
District E Budget Meeting	July 11, 2016
District D Budget Meeting	July 13, 2016
District B Budget Meeting	July 14, 2016
Public Hearing 1	July 19, 2016
HANO Board Meeting	July 26, 2016
Public Hearing 2	September 10, 2016
Dillard University Housing Fair	September 24, 2016
HANO Board Meeting	September 27, 2016
Public Hearing 3	October 3, 2016

Short surveys distributed at budget meetings, stakeholder meetings, and public hearings garnered 109 responses, while a longer, online survey received 127 responses.

#### Analysis of short survey

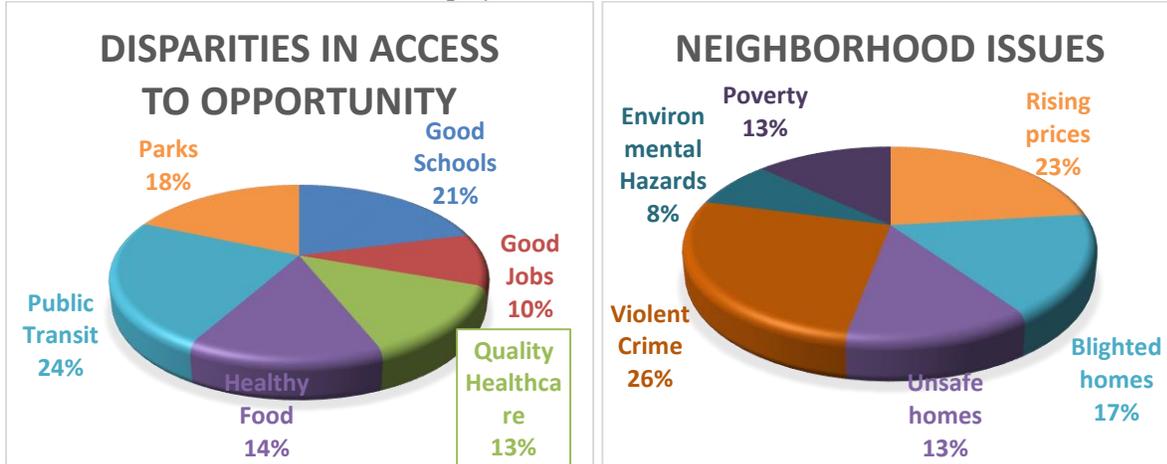
Of the 109 respondents to the short survey, the majority of the respondents identified as Black/African-American. The race/ethnicity composition was as follows:

- White 12
- Black 102
- Black and Latino 1
- American Indian 1
- Latino or Hispanic 2
- Other 3
- Did not provide 17

The age group demonstrated that the age groups of the 41 – 50 year old respondents and respondents 70 or older were underrepresented. The age group of respondents were as follows:

- Age 18-30 19
- Age 31-40 27
- Age 41-50 8
- Age 51-60 27
- Age 61-70 16
- Age 70+ 2

The issues that were identified are displayed in the below charts.



#### Analysis of Online Surveys

Responses to the on-line survey indicates an overwhelming response by white, college educated, middle-class women without children. The three top concerns expressed by these respondents about their neighborhood were violent crime, public transit, and rising prices while the three least concerns were unsafe homes, environmental hazards, and good jobs. The majority of these

respondents indicate no experience with discriminatory practices and, if they did experience discrimination, they knew their rights and where to get assistance.

### **Print Media**

- Advertisements were placed in the Times Picayune, the New Orleans Advocate, the Louisiana Weekly which is an African-American owned newspaper, Mary Queen of Vietnam bulletins, and XXXX on multiple dates during the planning period.
- Collaborated with the Mayor's Office of Human Needs – Americans with Disabilities Act (ADA) to provide outreach activity flyers to this target population.
- News article on Public Hearing - [http://www.theadvocate.com/new\\_orleans/news/article\\_34bf02d2-4e10-11e6-bf2f-5b6de5562baa.html](http://www.theadvocate.com/new_orleans/news/article_34bf02d2-4e10-11e6-bf2f-5b6de5562baa.html)

### **Social Media**

- Mayor Landrieu's Facebook Page posted information on the AFH process ([www.facebook.com/mayorlandrieu/](http://www.facebook.com/mayorlandrieu/))
- HANO, City of New Orleans, and GNOFHAC played a link to the online survey on their websites, and City Council members and GNOHA sent numerous e-mail blasts about the survey.
- Notices of hearings and meeting dates as well as links to AFFH information were posted on [www.hano.org](http://www.hano.org) and [www.nola.gov](http://www.nola.gov) and GNOHA and GNOFHAC websites.
- Drafts of the AFH Plan issued on August 19, 2016 and subsequent updates were placed on the websites of HANO and the City, as well as on stakeholder websites. Hard copies were also made available at HANO's Central and Site Management Offices, at the City's Office of Community Development, and at New Orleans Public Library branches.
- Live tweets of public hearings by Greater New Orleans Housing Alliance

### **Broadcasts**

- Local television news broadcasts reported on the initial July 19 AFFH Public Hearing and provided information about the process and other points of engagement.
- Interview regarding AFH on local African American focused radio station WBOK 1230 with Ellen Lee, Director of Housing and Community Development for the City of New Orleans.
- Broadcasts detailing comments and plan details heard at the September 10th public hearing was on local news channel WWL-TV.
- The AFH Plan was discussed on "Informed Sources" on September 9th on WYES, a local public broadcasting channel.

All fliers and communications about the AFH process advertised an email address ([AFFH@nola.gov](mailto:AFFH@nola.gov)) for the submission of additional commentary. Emailed comments and attached letters can be reviewed in Appendix B – Comment Letters

### **Outreach Activities Description for R/ECAPs, LEP Individuals, and Persons with Disabilities:**

The City and HANO primarily attempted to engage and encourage community participation by populations that are typically underrepresented in local planning processes through collaboration

with community organizations that work directly with the targeted populations. The AFH team engaged in targeted outreach to residents of R/ECAPs by collaborating closely with community organizations representing the neighborhoods. The team distributed flyers in R/ECAPs, as well as at local community centers, churches, and schools.

For persons with limited English proficiency (LEP), the City and HANO worked with the Greater New Orleans Housing Fair Housing Action Center (GNOFHAC) to perform outreach. GNOFHAC has been working with Puentes, an advocacy organization for the Latino community, to reach Spanish speakers. GNOFHAC had flyers announcing public meetings translated into Spanish. Those flyers were distributed to Puentes. These flyers were also read on-air on the Spanish-language radio and TV outlets that Lesley mentioned. The Director of GNOFHAC appeared on Telemundo with a Spanish-speaking staff member and Puentes on September 8th. GNOFHAC also performed an interview on KGLA's Spanish radio station on that date. In both appearances, GNOFHAC discussed the AFH process and encouraged viewers/listeners to attend the September 10<sup>th</sup> hearing. GNOFHAC also performed another Telemundo interview on Monday, September 26<sup>th</sup>.

In addition to Spanish speakers, GNOFHAC also reached out to Muslim community members. There are large populations of Arabic speakers living in certain communities on the Jefferson Parish west bank, in addition to an Urdu-speaking community in the Kenner area. GNOFHAC has contacts in both of those communities, and they circulated Arabic and Urdu flyers about public hearing meetings to those populations.

GNOFHAC also translated a flyer into Spanish, Arabic, and Urdu and circulated to promote attendance at the September 24<sup>th</sup> community meeting at Dillard University regarding the AFH plan and the final October 3<sup>rd</sup> public hearing.

From these efforts, 3% of survey respondents that attended public meetings identified as Latino. It is important to note that the population of Latino residents in New Orleans is around 5%.

Lighthouse Louisiana, which provides services for individuals with auditory and visual disabilities, made their services available at both AFH Public Hearings. All AFH meetings took place at facilities that are accessible to persons with ambulatory disabilities.

2. Provide a list of organizations consulted during the community participation process.

See Appendix A.

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

**Successful Community Participation Process:** The City and HANO initiated various outreach activities to engage community members in the AFH process. Together, these efforts comprised the City and HANO's Community Participation Process. Because of these outreach activities, HANO and the City witnessed unprecedented attendance at AFH planning meetings compared to attendance at past City and HANO planning meetings.

At the first stakeholder meeting to introduce community-based organizations and other interested parties to the task of developing a plan that affirmatively furthers fair housing, there were 43 attendees. Participants included stakeholder organizations, residents, and Resident Advisory Board members. Attendees from the Vietnamese and Spanish speaking communities were present as well as attendees representing formerly incarcerated individuals and persons with disabilities. The City and HANO provided stakeholders with data on disparities in access to opportunity in New Orleans and barriers to fair housing and asked attendees to be part of the process of developing solutions.

Collaborating as a planning team partner, GNOFHAC hosted a number of stakeholder capacity building sessions to help members of community-based organizations understand the issues central to the AFH process and provide feedback to assist in developing the AFH Plan. From these sessions, the AFH planning team was able to garner valuable input that was incorporated into the Plan.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Scribed comments from public meetings is included as attachment A summary of public hearing comments by topic area is as follows:

#### Housing Affordability

- Where the hospitals are built, the prices are going way up. A lot of people have been put out by the landlords near the hospitals because the landlords are raising rents.
- The only option for people is Habitat for Humanity.
- “If it wasn’t for Section 8, I would be out on the street.”
- Rent is too much. Paying 1,200 a month with four kids to be comfortable.
- Coming out of a housing development is like “Oh my god, what am I going to do?”
- Choosing between being comfortable and pulling child out of college.
- Not enough low-income and affordable housing.
- High rent versus low wages.
- Difficulty with upfront costs (deposits and first month rent) even with assistance.
- Higher rent forces people out of their community.
- Converting duplexes to single-family creates less rental housing.

#### Access to Housing

- One-bedroom market rates in tax-credits are over a year on waiting list.
- Where are people going? A lot of people living with families or in the shelters. Increase in homeless – living under the overpass, hanging out on the neutral ground, Carrollton, Napoleon.
- People building and constantly coming in from other states and pushing people out from better areas into the slum areas.
- Demand for housing near schools, jobs, etc.
- Gentrification causing residents to be pushed to areas with a lot of poverty to areas with less amenities and transportation.
- Short term rentals are causing evictions and will raise rent prices.

- Public Housing taking too long to complete, like Guste.
- Need more affordable housing.
- Live close to schools.
- Difficulty finding a house. Slum landlords. No jobs, no healthcare. PCP licenses? Access to food pantries. Downtown and Carrollton areas. Grocery stores. Only Walmart, Family Dollar, Dollar General. Community stores with no good food.
- HCV is for very, very low income people.
- Most people on the list don't get off the list until they pass away. A lot of people might qualify for the 60% units. Even on social security people are over income.

#### Renter Rights & Tenant Relations

- In mixed-income communities, third-party managers are a problem (not community-focused).
- No knowledge of renter rights and the power to enforce violation, as well as, risk of eviction.
- Education for the public on renter's rights.
- The developers come and bring these management teams in. People were told, "if we fix the gates, we are going to raise your rent."
- We need to take the community back as a community. It is not about community anymore. Marrero Commons.
- Do the individual public housing sites have a responsibility to inform tenants of what is happening in housing programs?
- Renters not having knowledge of what their rights are. Not having power to hold landlords accountable. The schools don't seem integrated. People seem forced into accepting substandard housing. A lot of blighted housing.

#### Quality of Housing

- People living in deplorable conditions. Mold, termites, lead paint, general disrepair. Leaks and nonfunctioning air conditioners. Landlords are unresponsive.
- Since Katrina, it hasn't gotten back to the point where it was. Conditions of homes. Some homes are deplorable and some people are living in luxury.
- Bad streets and not enough lighting.
- Low quality of housing (not up to code).
- Privatized community police and neighborhood watch that goes around. The construction is well-maintained Uptown. In lower-income areas construction is not as orderly. Majority of the houses in neighborhoods uptown are Airbnb.
- Blight map is concentrated in certain areas of the city. Blighted houses a big issue.
- Unsafe occupied houses.
- Housing needs and concerns should be on substandard properties. Lots of blighted property.
- Substandard Housing.
- Not enough safe, low-income housing. "It is the housing society thinks we should have because we are low-income."
- Abandoned houses with mold, termites, etc. Landlords expect tenants to make repairs.

### Housing Discrimination

- Discrimination because a person would like more cash instead of a voucher.
- Some landlords prefer voucher holders over cash.

### Jobs

- Transportation
- Jobs are concentrated in certain areas.
- Access to jobs is a problem. People working temporary jobs, jobs are not sustainable.
- Criminal background checks are keeping people from getting jobs.
- Like the airport, there are a lot of jobs, but it is really far, the JP (Jefferson Parish) bus is different from Orleans Parish.
- The streetcar is being built in the Bywater where they already have transportation.
- People who need transit in poor Black neighborhoods have to walk a far way to get anywhere, transportation is going to the richer areas still.
- The transportation is made for the tourists.
- Driving, transportation close to work can be expensive.
- Jobs that are close to home don't pay that much.

### Public/Private Investment Concerns

- Tapping into community services is important. There are community services but people are not aware of them.
- "God, what am I going to do." In Pigeontown, only five houses are lived-in and the others are blighted.
- Budget priority: build fewer jails and put more funds into affordable housing and schools and youth improvement.
- Grocery stores. No affordable grocery stores in vast places of the city.
- Building a grocery store at Columbia Parc, which is good, but it is the only one.
- Big infrastructure to reduce flooding uptown, but there are a lot of areas that have a lot of flooding.
- Not doing any work on roads in poorer Black neighborhoods.
- Want to see more equity in construction, levees, streets, potholes, lighting.
- Food deserts /a lot of blight in the industrial canal area.
- Uneven investment/infrastructure/development/allocation of resources in certain neighborhoods; seems like a way to push people out so developers can buy cheap and redevelop.

### Schools

- Students have to take the bus at 7 in the morning.
- Schools are fair, not good.
- A bus is the only way to get to school, can create a very long day.
- Not enough good schools.
- Problems with resources at schools.
- Lack of parent involvement.
- Not enough libraries.
- Libraries not open late enough.
- Schools not offering enough vocational education.

- Neighborhood schools – better integrated with community.
- Need better neighborhood schools, loss of a sense of community, no school pride.

#### Access to Healthy Food:

- There is Whole Foods, but it's unaffordable.
- Access to healthy food, but not affordable healthy food.
- Not enough grocery stores.
- Corner store food (not healthy).
- Not enough grocery stores.
- Food stamps not enough to afford healthy food.

#### Transit Access:

- Buses running less frequently.
- School buses are only on major roads, not into communities. Have to walk a long way for kids to catch a bus.
- City buses also don't go into the community, only outskirts on major roads.
- Transit not good in Jefferson, New Orleans East. No regional connectivity.
- Transportation not accessible. Not taking care of people who use services.

#### Recreation Facilities:

- Recreation facilities are available (but not programming).

#### Quality Health Care:

- Not enough neighborhood-based clinics (were more before Hurricane Katrina).
- Not enough residents have health insurance.
- Insurance is very costly, some deductibles are way too high.
- Health coverage from the state is limited.

#### Public Health & Environmental Concerns:

- Violent crime.
- Exposure to environmental health hazards.
- Poverty.
- Racial segregation.
- Groups working with minority poverty populations should go through Undoing Racism Training.
- Community also has to take responsibility for some issues.
- Agriculture Street landfill. Built on top of a landfill. Environmental injustice. Found out in 1993. Has cancer at 34. No school in the area. No store in the area. No bus in the area. Homeowners from HANO who are paying taxes but are not able to access their properties. Want relocation for the 53 people who are left back there.
- Budget priority: build fewer jails, and put more funds into affordable housing and schools and youth improvement.
- Agriculture street landfill. Built on top of a landfill. Environmental issues.

**Following is a summary of public comments received during the AFH Plan but not accepted for reasons stated below:**

- There was a public hearing comment raised that homeowners from HANO on the Agriculture Street landfill site are paying taxes but are not able to access their properties.

**All HANO-owned homes built on the Agriculture Street landfill (Press Park development) have been demolished. All of the remaining homes on the Press Park site are privately-owned. A fence has been placed around the perimeter of the property to provide security and public safety until the remaining privately-owned structures are demolished.**

#### **IV. Assessment of Past Goals, Actions and Strategies**

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

Goals were selected in the most recent Analyses of Impediments in 2010 were:

- Improve fair housing system capacity, access to system and ability to respond to needs.
- Improve communication and coordination among agencies and those interested in affirmatively furthering fair housing.
- Enhance understanding of fair housing by both consumers and providers.

- a. Discuss what progress has been made toward their achievement;

##### **Improving Fair Housing System Capacity**

- HANO's Housing Choice Voucher Program (HCVP) Department partnered with the Advocacy Center to conduct six (6) training sessions to enhance departmental resources by educating the HCVP staff on reasonable accommodations and recognizing unarticulated needs for assistance and how to offer customer assistance to improve customer satisfaction.
- HANO revised its hearing procedures to ensure that hearing officers grant a continuance of any hearing if a resident has a pending reasonable accommodation request. In making this change, HANO acknowledged that the hearing outcome may change based on the outcome of the reasonable accommodation request.

HANO revised its criminal background screening criteria to protect the rights of formerly incarcerated individuals to obtain housing. The new policy strikes a balance between the critical importance of public safety and the need for persons with criminal records, who are disproportionately people of color, to secure housing. The new procedures ensure that no applicant with criminal convictions will be denied housing without first receiving an individualized assessment.

##### **Increase Communication and Coordination**

- GNOHA along with HANO, the City, GNOFHAC, NORA, and many other community stakeholders were able to establish a Policy Working Group that met for over a year on a

regular basis to produce *HousingNOLA*, a ten-year housing plan that reflects upon housing conditions in the past, analyzes the present state of housing in New Orleans, and recommends strategies for making better housing policy decisions in the future in order to affirmatively further fair housing.

- HANO collaborated with HUD's Office of Fair Housing and Equal Opportunity (FHEO) to conduct a series of fair housing workshops for landlords and tenants on various fair housing requirements and concepts, including non-discrimination, disparate impact, reasonable accommodation, and the Violence Against Women Act.
- The City requires the use of HUD's Equal Housing Opportunity logo in all press releases and on all informational brochures that are used to solicit applications from owners and posts federal fair housing information in conspicuous areas of OCD's office.

### **Enhance Understanding of Fair Housing for Both Consumers and Providers**

- The City distributes written pamphlets and brochures about fair housing topics to participating developers, owners, and tenants who are involved in or affected by HOME-funded projects.
- HANO advises all HCVP participants about the program's portability feature that allows voucher holders to move to the jurisdiction of any housing authority in the United States at the time of voucher issuance. HANO also absorbs voucher holders porting into New Orleans from other jurisdictions in order to facilitate the return of households displaced by Hurricane Katrina.
- The City requires property owners and developers selected for the award of HOME funds to affirmatively market vacant units to members of protected classes that are the least likely to apply and to enter into a written agreement embodying that requirement.
- HANO has conducted several staff-led workshops with landlords to discuss and resolve program issues and improve landlord education on program rules, regulations, roles, and responsibilities.
- The City requires that sub-recipients' of HUD funds adopt a fair housing impact statement addressing not only how they will refrain from housing discrimination, but also how they will ensure that their housing and community development programs are accessible to persons with disabilities and do not contribute to or intensify segregated housing patterns.
- HANO worked with FHEO staff from HUD's New Orleans field office to host a series of fair housing workshops with landlords and property managers on the following dates: March 27, 2015, May 21, 2015, July 24, 2015, and September 30, 2015.
- HANO revised its criminal background screening criteria. The new policy considers convictions rather than arrests, and does not bar anyone categorically, except where mandated by law.

- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences);

*HousingNOLA* furthered important conversations about fair housing policies with agency leaders and multiple other stakeholders. Many of the plan’s recommended policies could promote the ultimate goal of creating integrated communities of opportunity throughout the city.

Since the 2010 Analysis of Impediments, fair housing policies and programs have greatly improved. The City, HANO, GNOFHAC, Southeast Louisiana Legal Services, and GNOHA collaborate as an informal working group with other community stakeholders to address housing issues and make recommendations on various issues. Through these working relationships, HANO and the City have been able to identify issues and make positive changes in their policies – thereby strengthening fair housing programs.

### HANO

HANO was able to successfully de-concentrate poverty at a number of its sites through the implementation of a mixed-income redevelopment strategy which supports the construction of public housing, Project-Based Voucher units, Low Income Housing Tax Credit units, market rate units, owner-occupied units, and other affordable rentals within a development. Therefore, although public housing residents are predominantly African-American, these residents are integrated into communities that include other types of units with more diverse demographics. The following table showcases the mixed-income profile of HANO’s public housing communities.

HANO COMMUNITIES	PUBLIC HOUSING UNITS (51%)		OTHER AFFORDABLE UNITS (25%)			MARKET RATE UNITS (24%)	ALL UNITS (100%)
	ACC	ACC/LIHTC	LIHTC	PBV/LIHTC	PBV	MKT	TOTAL
<b>UNIT COUNTS</b>	<b>671</b>	<b>1335</b>	<b>729</b>	<b>209</b>	<b>83</b>	<b>954</b>	<b>3981</b>
<b>PERCENT OF TOTAL</b>	<b>17%</b>	<b>34%</b>	<b>18%</b>	<b>5%</b>	<b>2%</b>	<b>24%</b>	<b>100%</b>

**Unit Type Legend:**

ACC = Annual Contributions Contract ("Public Housing")

LIHTC = Low Income Housing Tax Credit

MKT = Market Rate

PBV = Project Based Voucher

Two of HANO’s scattered site property groups are located in high opportunity areas where the poverty rates are under 20%. Those sites are Downtown Scattered Sites and Uptown Scattered Sites which house public housing residents in high opportunity neighborhoods.

In addition to continuing to implement policies to de-concentrate poverty and integrate communities, HANO, through collaboration with a number of fair housing and other advocacy groups, developed a new criminal background screening procedure in 2016. This procedure

outlined the review process used to determine whether an applicant or potential additional household member should be granted or denied housing assistance due to a past criminal conviction and ensured that there is absolutely no presumption that an applicant with a criminal conviction should be denied housing assistance. HANO is in the beginning stages of implementing this policy.

### **City of New Orleans**

The City was able to work with HANO and community stakeholders to develop the *Housing for a Resilient New Orleans* plan. This plan proposes to build or preserve 7,500 affordable housing units by 2021, including 4,000 units by 2018 and another 3,500 units by 2021.

The City has implemented programs that increase access to quality affordable housing and quality of life amenities and services. New Orleans received a \$141 million grant through HUD's National Disaster Resilience Competition and will use the grant to leverage additional private-sector capital to support a range of neighborhood projects, including demonstration projects that create and combine green space, public infrastructure, and storm water management. Also, NORA and the City launched the Lower 9th Ward Initiative, which will accelerate the redevelopment of 229 vacant or blighted properties in one of the areas hardest hit by Hurricane Katrina.

To create greater access to opportunity, the City also adopted HireNOLA, which requires City contractors to demonstrate that at least one-third of all work hours on projects are being completed by local workers. In addition, the City increased the minimum wage for its employees to \$10.10 and enacted a living wage ordinance for local government contractors.

Although the City and HANO have made some progress on a number of goals, they have fallen short on the overarching goals of furthering fair housing to produce more racially and socioeconomically integrated communities in New Orleans. The goals in the 2010 Analysis of Impediments were not specific enough to guide targeted action to further fair housing. As a consequence, segregation and concentrated poverty areas appear to have become more concentrated, and some neighborhoods have remained the same. Few communities have become more integrated.

- c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

To achieve past goals or mitigate problems, HANO and/or the City can do the following:

- HANO can develop policies that improve fair housing systems capacity to further the rights of protect classes by:
  - Implementing a Limited English Proficiency Policy to ensure that residents who have limited English proficiency have access to HANO housing opportunities;
  - HANO can improve its reasonable accommodations policy.
- HANO and the City can continue to meet with housing groups and organizations that represent members of protected classes to implement fair housing goals and strategies.
- HANO and the City can increase communication to residents, developers, and other stakeholders about fair housing laws and policies.

To mitigate fair housing issues and contributing factors in New Orleans, the City and HANO will:

- Develop specific, measurable, attainable/actionable, relevant/realistic, and timely (SMART) goals;
- Evaluate progress towards the achievement of those goals on a quarterly basis; and
- Expand and enhance stakeholder and community involvement in planning and implementation.

The City and HANO are currently working closely with GNOFHAC on the AFH Plan; however, they have missed opportunities to support GNOFHAC's work to improve fair housing system capacity in the past. Additional steps the City and HANO could take to support GNOFHAC's work include:

1. Provide monetary support for GNOFHAC's education and enforcement programs.
  2. Provide letters of support for GNOFHAC's grant applications.
  3. Facilitate collaboration with NORD-C on Fair Housing Five workshops with youth.
  4. Publicize GNOFHAC trainings and outreach materials through the Office of Neighborhood Engagement's email list and other relevant lists.
  5. Issue a Fair Housing Month (April) press release from the Mayor's office highlighting the availability of fair housing resources.
  6. Implement transparent tracking and reporting of complaints to the Human Relations Commission.
  7. Display GNOFHAC resources at the One Stop Shop.
  8. Schedule training for 311 operators on fair housing issues and resources.
- d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

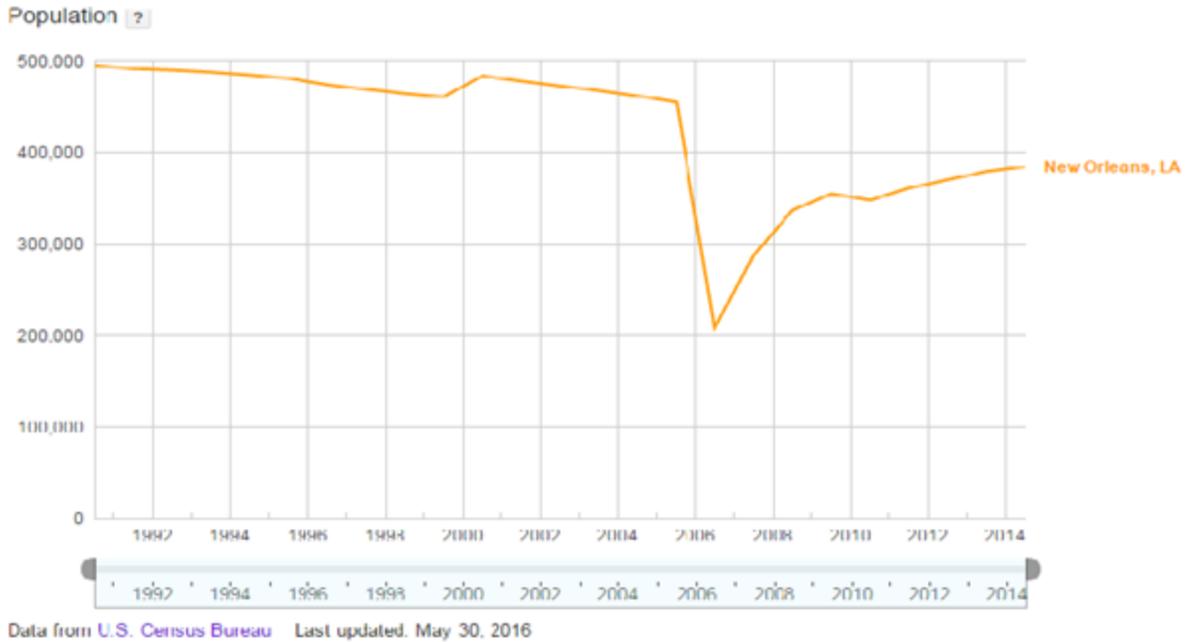
Past experience has reinforced the need to have goals that are specific, measurable, attainable, and timely instead of goals that lack specificity. To further fair housing, the City and HANO understand that they must review and analyze data, set measurable goals, and take relevant actions that can be attained in an estimated period of time.

## **V. Fair Housing Analysis**

### **A. Demographic Summary**

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

*Please note that the terms African-American and Black are used interchangeably in this document. Also, White and Non-Hispanic White are used interchangeably in this document.*



**Demographic Summary:** According to US Census data, the demographics of New Orleans have undergone tremendous change in the period between 1990 and 2010. In this time span, economic doldrums in the 1990s and natural disasters in the early to mid-2000s have led to decreases in the City’s population. Following the unprecedented evacuation of the entire city following Hurricane Katrina and the subsequent levee failures in 2005, the population dramatically dropped down to just over 200,000. In the following years, that number has risen back to 368,471 as of 2014 but has yet to reach the population number of nearly half a million people counted in the 1990 Census (495,946).

In August 2005, Hurricane Katrina and the levee failures displaced much of the city’s population. Many displaced residents returned to areas that experienced less damage, such as the West Bank of Orleans Parish and the unflooded areas of Uptown. Despite its population shrinking 11 percent since the start of the 2000 decade, parts of the metropolitan region experienced growth as population shifted away from damaged areas. While the City remains largely African-American (59.6%), one of the most notable shifts in population is the disproportionate decline in African-American residents. Following Hurricane Katrina, due in large part to the influx of workers who arrived to take part in the recovery, the Latino population has grown significantly. Many Latino workers have chosen to stay and have established households. While Jefferson Parish is home to the largest number of Hispanics in the region, New Orleans has the second largest number of Hispanics (18,051).

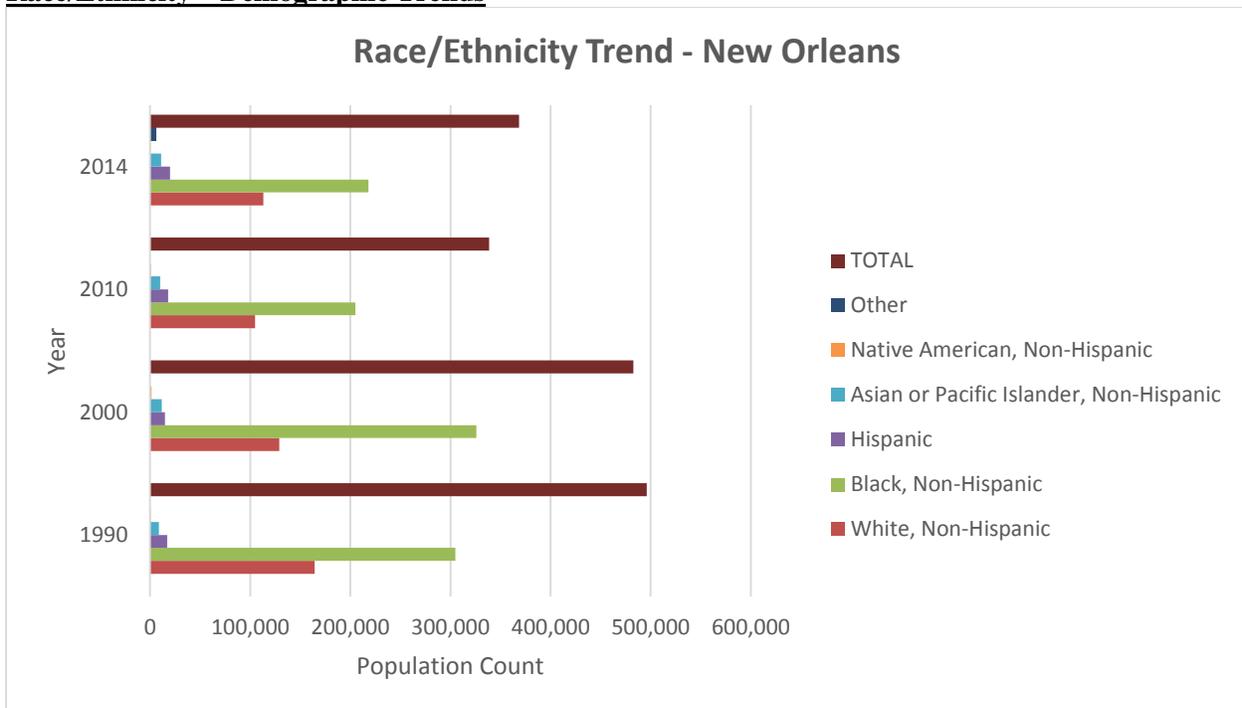
The breakdown of demographic and population data per HUD data tables 1, 2, and 3 and HUD Maps 1, 2, and 3 is as follows:

**Overall Population – Demographic Trends**

- In New Orleans, the overall population has declined since 1990.
- The overall population in 1990 was 496,882.
- In 2000, the overall population was 484,674, a decline of 12,208 people or 2.5% since 1990.

- In 2010, after Hurricane Katrina, the Orleans parish population experienced a significant decline with the overall population decreasing to 343,829, a decline of 137,845 residents or 28% of its population. The City's population's nadir was at just over 200,000, shortly after Hurricane Katrina.
- By 2014, the total population of New Orleans increased to 368,471 residents.
- In the region, the overall population increased from 1990 to 2000 but experienced a decrease between 2000 and 2010, after Hurricane Katrina.
- The overall population of the region was 1,285,197 in 1990.
- In 2000, the regional population increased to 1,337,742, an increase of 52,545 (4%)
- In 2010, the region experienced a decline after Hurricane Katrina with the population decreasing to 1,189,866, a decrease of 147,876 people (11% decline from 2000).
- In 2014, the regional overall population was estimated to be 1,251,849, an increase of 61,983 (5%) since 2010.

### **Race/Ethnicity – Demographic Trends**



### **City of New Orleans (1990 to 2000)**

- From 1990 to 2000, the Non-Hispanic White (White) and Hispanic populations declined.
- The White population decreased from 164,396 to 128,857, a decline of 35,539 (22%) White residents.
- The Hispanic population decreased from 17,149 to 14,812 which is a decline of 2,337 people (13%).
- All other racial and ethnic groups increased in population during the 1990 to 2000 period.
- The Black population grew from 304,943 residents to 326,018 residents, which is an increase of 21,075 (7%).
- The Asian-Pacific Islander community increased from 8,871 to 11,740, an increase of 2,869 residents (32%).

- The Native American population increased by 836 residents, growing from 587 residents to 1,423 residents, which is a significant increase of 70%.

#### **City of New Orleans (2000-2010)**

- It is important to note that during this period New Orleans experienced a mass exodus due to Hurricane Katrina in 2005.
- Four of the five racial and ethnic groups experienced a decline from 2000 to 2010.
- The Black population saw a drastic decline to 204,866, which is a loss of 121,152 people or 37% of the City's Black population.
- The White population also experienced a decline but to a much smaller degree, decreasing almost 19% from 128,857 to 104,770, which is a loss of 24,087 residents.
- The Native American population, which had huge increased between 1990 and 2000, declined between 2000 and 2010. From 2000 to 2010, the Native American population went from 1,423 to 827, a decline of 596 residents which is a 42% loss of population.
- The Asian-Pacific Islander community decreased from 11,740 people to 9,988, a decline of 1,752 (15%).
- Despite Hurricane Katrina, the Hispanic population managed to increase during this period, growing to 18,051, which is an increase of 3,239 people or 22%.
- The Black population was 67% of the total population in 2000 and was reduced to 60% in 2010, whereas, the White population, which was declining pre-Katrina, increased from 27% of the population to 30%.

#### **City of New Orleans (2010 – 2014)**

- The White population increased from 104,770 in 2010 to 113,105 in 2014 and went from comprising 30% of the total population to 31% of the total population.
- The African-American population increased from 204,866 in 2010 to 217,983 in 2014 but came to comprise a smaller portion of the total population, going from 60% of the total population to 59% in 2014.
- The Hispanic population continued to grow, going from 18,051 residents to 19,911 residents. The percentage of city residents who are Latino increased from 5.25% of the total population in 2010 to 5.40% of the total population in 2014.
- The Asian-Pacific Islander population also increased from 9,988 residents in 2010 to 10,842 residents in 2014.
- The Native American population continued to decline, going from 827 residents to 536. The Native American population was 0.24% of the total population in 2010 but is 0.15% of the total population as of 2014.

#### **New Orleans-Metairie-Kenner, LA MSA (1990 to 2000)**

- Similar to the City of New Orleans, the White population of the metropolitan region was in decline going from 762,564 people to 731,452.
- The populations of all other racial and ethnic groups increased during this period.
- The Black population increased from 442,710 to 503,660 (60,950 or 14%).
- The Hispanic population increased from 53,723 to 58,480 (4,757 or 9%).
- The Asian/Pacific Islander population increased from 20,585 to 31,620 (11,035 or 54%).
- The Native American population increased from 3,619 to 7,656 (4,037 or 112%).

## **New Orleans-Metairie-Kenner, LA MSA (2000 to 2010)**

- In the region, the populations of three racial and ethnic groups declined.
- Similar to in the City of New Orleans, the White population decreased by 13%, going from 731,452 to 639,356, a loss of 92,096 people.
- The Black population in the region went from 503,660 people to 403,731, losing 99,929 people or 20%. The decline in African-American population was less severe than in the City of New Orleans.
- The Native American population suffered a loss of 3,309 people, which was 43%. The population went from 7,656 in 2000 to 4,347 in 2010. The decline was similar to that experience in the City of New Orleans
- Two populations grew in the region despite the effects of Hurricane Katrina.
- Similar to the trend in the City of New Orleans, the Hispanic population showed a regional increase. However, the increase was much larger in the region with a 58% gain as opposed to an uptick of 22% in the City of New Orleans. The Hispanic population in the region went from 58,480 people to 92,178 for a total gain of 33,698 people.
- The Asian-Pacific Islander population also showed a small increase in the region with a gain of 264 residents. By contrast, the Asian-Pacific Islander population declined by 15% in the City of New Orleans during this same period.

## **National Origin – Demographic Trends**

### **City of New Orleans**

- The number of foreign born residents decreased slightly from 1990 to 2000 by 200 people or less than a tenth of a percent. In 1990, the population was 20,781, and, in 2000, the population was 20,581.
- During the period from 2000 to 2010, the foreign born population increased despite the devastation from Hurricane Katrina. The population went from 20,581 to 21,094, which is a gain of 513 or 2.5%.
- From 2010 to 2014, the foreign born population increased from 21,094 to 22,108.
- The top three countries of origin for foreign born residents are:
  - Vietnam 4,075
  - Honduras 3,558
  - Mexico 1,751

### **New Orleans-Metairie-Kenner, LA MSA**

- From 1990 to 2000, the population of foreign born residents increased from 52,998 to 64,166, an increase of 11,168 (21%).
- The number of foreign born residents also increased from 2000 to 2010, going from 64,166 residents to 86,328, an increase of 22,162 (35%).
- The top three countries of origin for foreign born residents are:
  - Honduras 18,475
  - Vietnam 10,272
  - Mexico 8,489

**Limited English Proficiency – Demographic Trends**

**City of New Orleans**

- Since 1990, the population with limited English proficiency has declined from 14,997 people in 1990 to 14,168 people in 2000 and 12,527 people in 2010.
- Although the number of residents with limited English proficiency has declined, their percentage of the total population did increase between 2000 and 2010 from 2.92% to 3.64%.
- The contrast between the increasing proportion of foreign born residents and the decreasing proportion individuals with limited English proficiency is largely attributable to the aging of the population of native-born monolingual French speakers.
- The three main languages spoken by people with limited English proficiency in the City of New Orleans are:
  - Spanish 6,961
  - Vietnamese 3,296
  - French 739

**New Orleans-Metairie-Kenner, LA MSA**

- While the limited English proficiency population was in decline in the City of New Orleans, the population continued to increase in the region growing from 38,685 in 1990 to 42,253 in 2000 and 52,828 in 2010.
- The three main languages spoken by people with limited English proficiency in the region are:
  - Spanish 33,652
  - Vietnamese 8,354
  - French 1,933

**Sex – Demographic Trends**

**City of New Orleans**

- The female population in Orleans Parish continued a downward trend during the period of 1990 to 2010 where females were once 54% (266,373) of the population in 1990 then declined to 53% (256,993) of the population in 2000, and declined further to 51.65% (177,581) of the population in 2010. However, the number of female residents increased slightly between 2010 and 2014 from 177,581 to 191,728, which was 52.03% of the total population.
- The male population continued to increase its percentage of total population from 46% in 1990 and 47% in 2000 to 48% in 2010 but declined slightly to 47.97% in 2014.
- Although the male population increased in percentage of the total population, the percentage remains below that of the female population but the gap is decreasing every ten years. The relative increase in the male population between 2000 and 2010 may be partially attributable to the influx of workers who came to New Orleans to participate in the rebuilding of the city after Hurricane Katrina.

<b><u>Sex</u></b>	<b><u>1990</u></b>	<b><u>2000</u></b>	<b><u>2010</u></b>	<b><u>2014</u></b>
Male	230,509 (46.39%)	227,681 (46.98%)	166,248 (48.35%)	176,743 (47.97%)
Female	266,373 (53.61%)	256,993 (53.02%)	177,581 (51.65%)	191,728 (52.03%)

## **New Orleans-Metairie-Kenner, LA MSA**

- The male and female population in the region followed the same pattern as in the City of New Orleans with the male population steadily increasing its percentage of the total population while the female population steadily decreased.
- The female and male population trend were as follows:

<u>Sex</u>	<u>1990</u>	<u>2000</u>	<u>2010</u>
Male	611,391 (47.6%)	639,558 (47.8%)	579,187 (49%)
Female	673,805 (52.4%)	698,183 (52.2%)	610,679 (51%)

## **Age – Demographic Trends**

### **City of New Orleans (1990 to 2000)**

- There was a nominal decline in the “under 18” age group during this period with 136,936 (27.6%) in 1990 and 132,791 (27.4%) in 2010.
- There was a nominal increase in the “18-64” age group during this period with 295,359 (59%) in 1990 and 295,082 (61%) in 2010.
- The 65+ age group was in decline between 1990 and 2000 going from 64,587 residents to 56,801, a loss of 7,786 (12%) residents.

### **City of New Orleans (2000-2010)**

- There was a distinct decline in those under 18 with a 45% decrease in the youth population between 2000 and 2010. The under 18 population lost 59,576 residents, down from 132,791 residents in 2000 to 73,215 in 2010 which was 21% of the total population.
- Between 2000 and 2010 the “18-64” population decreased by 62,107; however, the percentage of this group’s total population increased by 7% going from 61% in 2000 to 68% in 2010.
- The 65+ age group lost about 34% of its population with a loss of 19,162 residents going from a population of 56,801 in 2000 to 37,639 in 2010 which represented 11% of the total population.
- The average age for the metropolitan region has increased from 34.8 to 37.3 years old from 2000 to 2015. <http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/>. The influx of workers who came to New Orleans to take part in rebuilding efforts is likely partially responsible for the increase in the share of the population comprised of working age adults.

### **City of New Orleans (2010-2014)**

- The under 18 population had a slight increase during this period going from 73,215 individuals to 75,168, and comprising 20% of the total population.
- The 18-64 population also had an increased from 232,975 residents in 2010 to 251,085 in 2014, remaining at 68% of the population.
- The 65+ age group also had an increase in population. This group had 37,639 residents in 2010 and increased to 42,218 residents in 2014 but remained 11% of the population which was the case in 2010.

- Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The Data Center’s June 2016 report entitled “Who Lives in New Orleans Now” found that after Hurricane Katrina, Jefferson Parish and New Orleans initially experienced a disproportionate return of homeowners, but, as of 2014, both parishes have returned to their pre-Katrina homeownership rates. With a 46 percent homeownership rate in New Orleans, a 62 percent homeownership rate in Jefferson Parish, and a 78 percent homeownership rate in St. Tammany, New Orleans lags, Jefferson is on par with, and St. Tammany exceeds the national homeownership rate. (<http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/#homeownership>)

Below are maps showing percent of renter-occupied housing by block group and showing New Orleans neighborhoods in order to facilitate a comparison of tenure patterns by neighborhood. A third map shows that, over time, renters have experienced rising prices, and many cannot afford to live in the same neighborhoods they resided in before Hurricane Katrina. In 2000, most renter households could cover rent and utilities without spending more than 30% of their household income. Data from the 2009-2013 ACS shows that in significant swaths of the city, long-term residents' incomes would not be enough to pay current rents without a cost burden. African-American households are even more likely to face this burden.

### U.S. Census 2012 Renter Occupied Housing



**B. General Issues**

**i. Segregation/Integration**

**1. Analysis**

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

Table 3 from HUD’s AFFH Data & Mapping Tool provides dissimilarity index data for the City of New Orleans and the New Orleans-Metairie-Kenner, LA MSA. The dissimilarity is a measure that social scientists use to assess the level of residential racial or ethnic segregation within a geographic area. The index reflects the percentage of people of a certain group, such as African-Americans, who would have to move to a different Census Tract in order to be evenly distributed throughout the city or region in relation to another group, such as Non-Hispanic Whites. Values from 0 to 39 indicated low segregation, values from 40 to 54 indicate moderate segregation, and values from 55 to 100 indicate high segregation.

**City of New Orleans**

In New Orleans, all racial/ethnic groups except Hispanics experienced high segregation with scores above 55 in 1990, 2000, 2010, and 2014. The dissimilarity index for Hispanics has also increased quickly over the past 14 years, rising from a low level of segregation to a moderate level of segregation.

<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>				
<b>Racial/Ethnic Dissimilarity Index</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>2014</b>
Non-White/White	60.07	63.44	68.31	66.62
Black/White	62.52	65.88	71.88	71.44
Hispanic/White	34.49	35.04	42.82	50.37
Asian or Pacific Islander/White	61.49	58.20	61.05	68.55

**New Orleans-Metairie-Kenner, LA MSA**

In the region, all but two racial groups have consistently experienced high segregation since 1990. The Hispanic population experienced low segregation in 1990 and 2000 but experienced more moderate segregation by 2010. The Asian population experienced more moderate segregation since 1990. The HUD Data Table excerpt below reflects these trends.

	<b>(New Orleans-Metairie, LA CBSA) Region</b>		
<b>Racial/Ethnic Dissimilarity Index</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>
Non-White/White	59.99	60.47	57.89
Black/White	67.78	68.42	66.74
Hispanic/White	31.33	35.79	41.01
Asian or Pacific Islander/White	50.16	47.89	52.05

- b. Explain how these segregation levels have changed over time (since 1990).

**City of New Orleans**

The level of segregation was increasing from 1990 to 2010 for all groups in New Orleans. Black/White segregation appears to have plateaued since 2010, while Hispanic/White and Asian/White segregation has increased quickly between 2010 and 2014. The Hispanic population experienced low segregation in 1990 and 2000 with scores below 39 but began experiencing moderate segregation by 2010 with a dissimilarity index of 43.

**New Orleans-Metairie-Kenner, LA MSA**

In the region between 1990 and 2000, all racial and ethnic groups experienced increased segregation except the Asian/Pacific Islander group.

Between 1990 and 2010 the black population and the white population had a nominal decrease in segregation. The black population dissimilarity score in 1990 was 68 and in 2010 it was 67. The Non-White population had a dissimilarity score of 67 in 1990, 60 in the 2000, and 58 in 2010.

The Asian and Hispanic population saw an increase in segregation from 1990 to 2010 with the Hispanic population going from low to moderate segregation.

- c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Based on Maps 1 and 3 from the AFFH Data & Mapping Tool and the New Orleans Neighborhood Map as captured above, the following neighborhoods demonstrate disproportionately high and low levels of segregation.

**Segregated Areas**

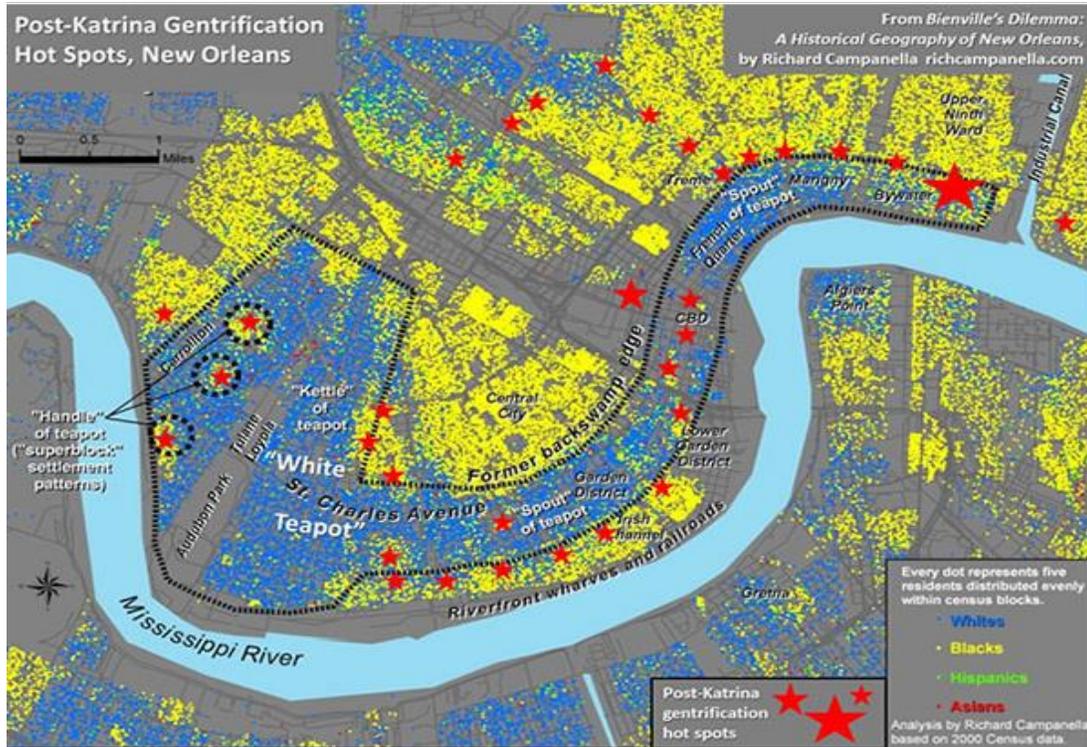
- French Quarter is highly segregated with majority white residents.
- New Orleans East communities are highly segregated with mostly Vietnamese residents living in the Michoud sections and Blacks and Hondurans living around Hayne, Crowder, and Chef Menteur.

- The Upper and Lower 9th Wards, the 7th Ward, large swaths of Gentilly, Gert Town, Central City, and Hollygrove all have a far higher percentage of African-Americans than the percentage of New Orleans.
- Central Business District, Lower Garden District, Garden District, Uptown, Audubon, City Park, Marigny, Bywater, Algiers Point, and all of Lakeview are majority White.

### **Integrated Areas**

- The River Gardens area, where a redeveloped public housing development is located, appears more integrated than other New Orleans communities.
- Fair Grounds, Tremé, and some parts of Mid-City also appear more integrated than other areas.
- Although the Irish Channel has become increasingly White since 1990, it still maintains a level of integration greater than other areas.
- Old Aurora and pockets of Tall Timbers/Brechtel in Algiers are more integrated communities when compared to other neighborhoods in New Orleans.

The map below depicts areas with a concentration of White, Black, Hispanic, and Asian populations and highlights gentrification patterns since Hurricane Katrina. Gentrification often creates temporary "windows of integration" while neighborhoods are shifting from majority people of color to majority White. The Irish Channel, Tremé, Fair Grounds, and Mid-City neighborhoods are perfect examples of this. The "White Teapot" Richard Campanella describes in the map below has been both internally whitening and spreading. According to Campanella, "the internal whitening has meant that once more diverse neighborhoods like the Lower Garden District and Bywater are now majority white. The spreading present in the Tremé, Irish Channel, Fair Grounds, and Mid-City is the result of the fact that historic neighborhoods of color are porous to White residents, but historically White neighborhoods are not porous to residents of color."



- d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Based on data cross-referenced with Map 6 from the AFFH Data & Mapping Tool and the Greater New Orleans Data Center's maps reflecting concentrated areas of poverty, the following locations of homeowners and renters and levels of segregation or integration have been captured:

**Central City** – Central City has an African-American population of 72%, as compared to a White population of 17%. 77% of households living in Central City are renters, and 23% are homeowners in Central City.

**New Orleans East 'Little Woods'** - The Little Woods neighborhood has a population of 92.6% African-Americans, as compared to a 3% White population, .9% Asian population. 49% of the households in the 'Little Woods' neighborhood are renters, as compared to 51% who are homeowners.

**Lower 9th Ward** - The Lower 9th Ward is a highly segregated community with a 96% African-American population compared to a White population of 2%. Renters in the Lower 9th Ward comprise 34% of households. By comparison, a relatively high 64% of households are homeowners.

**Gert Town** - 88% of the population is African-American, while 5% of the population is White. 82% of households in Gert Town are renters, and 18% are homeowners.

Treme/Lafitte - 75% of the population is African-American, as compared 17% of the population which is White. 66% of households in the Lafitte/Treme neighborhood are renters. Thirty-four (34%) of households in the Treme/Lafitte area are homeowners.

7th Ward – The 7th Ward is also a segregated R/ECAP area although recent trends show demographic changes and signs of possible gentrification. The data shows that 87% of the population is African-American, as compared to 7% of the population which is White. 65% of households in the 7th) Ward neighborhood are renters. 35% of 7th Ward households are homeowners.

B.W. Cooper – B.W. Cooper, a redeveloped, mixed-income public housing development, is another segregated R/ECAP area where the data shows that 91% of the population is African-American, 7% of the population is Hispanic, and 1% of the population is White. 98% of households in the B.W. Cooper neighborhood are renters, and 2% are homeowners.

Village de l’Est (New Orleans East) – This neighborhood is a segregated R/ECAP area. The Village de l’Est neighborhood in New Orleans East has an African-American population of 43%, an Asian population of 45%, a White population of 2%, and a Hispanic population of 9%. Renters comprise 37% of households in the Village de l’ Est neighborhood, and homeowners comprise 63%. Asian neighborhood residents are predominantly Vietnamese-American.

Lakeview – Lakeview is a neighborhood that is segregated and is not a R/ECAP. Lakeview has an African-American population of 1%, a Hispanic population of 4%, and a White population of 94%. The data shows that 32% of Lakeview households are renters, and 68% are homeowners.

Navarre – Navarre is another neighborhood that is segregated and is not a R/ECAP. The Navarre neighborhood has an African-American population of 5%, a Hispanic population of 8%, and a White population of 84%. 53% of households in Navarre are homeowners, and 47% renters.

Garden District - The Garden District neighborhood is also segregated with a population that is 3% African-American, 5% Hispanic, 1% Asian, and 88%. Renters in the Garden District neighborhood comprise 47% of households, and 53% of households are homeowners.

- e. Discuss how patterns of segregation have changed over time (since 1990).

According to the City of New Orleans’ 2010 Hazard Mitigation Plan, the loss of 99,650 African-American residents and 11,494 White residents after Hurricane Katrina could be attributed to the following factors directly linked to the storm:

<http://www.nola.gov/getattachment/Hazard-Mitigation/Hazards-and-Planning/Orleans-Parish-2010-Hazard-Mitigation-Plan-Final-032311.pdf>

- New Orleans had a wrecked infrastructure system citywide, and vital services were completely shut down in the wake of Hurricane Katrina.
- Loss of affordable housing in New Orleans post-Hurricane Katrina.
- Challenges re-opening schools post-Hurricane Katrina.
- Loss of public transportation post-Hurricane Katrina.

- Loss of health services and facilities, including Charity Hospital and community health clinics that served low-income populations,) post-Hurricane Katrina.
- Loss of amenities, such as grocery stores, drug stores, service-oriented businesses, as well as restaurants and entertainment venues.
- Loss of economic development and employment opportunities post-Hurricane Katrina.
- Loss of employment as a result of Hurricane Katrina.
- Loss of community structure as a result of Hurricane Katrina.
- Loss of public services (health, government agencies, recreation, education), primarily for those with disabilities, the elderly, youth, low-income people, people of color.
- Loss of over 5,000 public housing units and a subsequent increase in the size of the HCVP program.

Much of the city's rental housing stock was damaged after the storm, and the investment in rebuilding rental housing fell short of meeting the need, causing rents to spike. The few areas that remained available to voucher holders were often in majority African-American, lower-income neighborhoods, farther from job centers, transit, and other amenities.

The plan detailed the ways in which returning to New Orleans post-Katrina was challenging for the most vulnerable populations, which included low-income African-American families, people with disabilities, the elderly, and renters who found it difficult to return home because of the lack of financial services, employment, and transportation, as well as suitable housing options. Higher-income residents with homeowner's insurance re-populated New Orleans more quickly than uninsured and underinsured homeowners who were forced to wait for federal funding from the Road Home Program to rebuild their houses.

The Road Home Program also utilized an inequitable formula for determining compensation grants for homeowners to rebuild their storm-damaged homes. Grants were based on pre-storm home value rather than the cost of repairs, resulting in a disproportionate negative impact on low-income households and households of color as households in high income, largely White neighborhoods received far greater rebuilding support than households in low income, largely African-American neighborhoods.

[https://www.washingtonpost.com/business/economy/hud-to-pay-62-million-to-la-homeowners-to-settle-road-home-lawsuit/2011/07/06/gIQAtsFN1H\\_story.html](https://www.washingtonpost.com/business/economy/hud-to-pay-62-million-to-la-homeowners-to-settle-road-home-lawsuit/2011/07/06/gIQAtsFN1H_story.html)

According to a 2015 LSU survey, Whites who returned to New Orleans were generally able to get back into their homes sooner than African-Americans, typically within a year (70 percent). Only 42 percent of African-Americans were able to get back home in that time.

Residents who lived in neighborhoods severely damaged by Hurricane Katrina (80% of the city) waited longer to return as landlords had difficulty their properties to meet the City of New Orleans' requirements for habitability. Sociologist Elizabeth Fussell wrote in a 2011 study entitled "Race, Socioeconomic Status & Return Migration to New Orleans after Hurricane Katrina" that New Orleans has become whiter and more affluent, as predominantly African-American low-income residents have been returning at a much slower pace.

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2862006/>

Table 2 from the AFFH Data & Mapping Tool shows that, in 1990, the African-American population in New Orleans was 304,943 (61%), and the White population was 164,396 (33%). By 2010, there were 204,866 (60%) African-Americans and 104,770 (30%) Whites.

Broadly, areas that were majority African-American before the storm and on lower ground, such as New Orleans East and parts of Gentilly, have become even more heavily African-American over the past 11 years. Areas that were majority African-American but on higher ground have changed quickly and are becoming significantly whiter. These areas include Bywater, Irish Channel, E. and W. Riverside, Bayou St. John, and parts of Central City, Leonidas, Tremé, St. Roch, St. Claude, and the 7th Ward.

- f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

New Orleans is in the process of rebuilding the entire city after multiple recent natural and human catastrophes. The City of New Orleans has benefited from significant infusions of federal funding to facilitate recovery efforts. It has adopted a Place-Based Area Strategy, which is designed to make investments in areas that are in need of public subsidy to reach their full potential and that have or will have other investments that can be leveraged with city funds. Since Hurricane Katrina, White and Latino residents have relocated to New Orleans and decided to remain and make a home in many of the city's R/ECAP neighborhoods. The influx of new, disproportionately White and relatively more affluent residents in R/ECAPs may be contributing to the displacement of long-time neighborhood residents. Additionally, zoning ordinances limiting multi-family housing developments may contribute to segregation in certain neighborhoods, such as Lakeview and the Garden District neighborhoods. In some cases, rebuilding efforts have targeted public subsidy and infrastructure investment in historically African-American, high-ground neighborhoods that are poised to gentrify. Without a complimentary investment in affordable housing, some of these neighborhoods have already shifted to majority White and long-time residents are not present to enjoy new amenities.

## **2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

On September 29, 2006, St. Bernard Parish passed the "blood relative" ordinance, which restricted rentals to the blood relatives of property owners who were over 90% White. GNOFHAC filed a fair housing law suit to overturn this racially discriminatory policy ('How Racist Housing Laws are Keeping New Orleans White', <http://fusion.net/story/137351/how-racist-housing-laws-are-keeping-new-orleans-white/>, 2015). Following a consent decree in which St. Bernard Parish agreed to rescind the ordinance, the parish continued to engage in a pattern of discriminatory conduct by obstructing a Low Income Housing Tax Credit development in Chalmette. GNOFHAC continued to challenge the parish's discriminatory conduct, and the development eventually proceeded following many court orders regarding the parish's noncompliance with the Fair Housing Act and with the consent decree from the "blood relative" case.

- b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Homeowners and renters who are racial or ethnic minorities or who have disabilities tend to live in R/ECAPs. The City of New Orleans has adopted a Place-Based Area Strategy, which is designed to prioritize investments in areas that are in need of public subsidy to rebuild their flood protection systems, roads, bridges, schools, parks, and public facilities. New Orleans has focused on 11 Place-Based Areas (PBAs) throughout the city. The PBAs in New Orleans are predominantly African-American R/ECAPs. The PBAs in New Orleans are Hollygrove, Mid-City, Gert Town, B.W. Cooper, Central City, Pontchartrain Park, the 7th Ward, St. Roch, the Lower 9th Ward, Riverview, and New Orleans East.

The Place-Based Area Strategy incorporates the principle that a vibrant, sustainable neighborhood contains an array of resources for its residents including but not limited to housing, jobs, transportation, education, and social services to assist those with special needs. Various City of New Orleans departments, including Public Works, Capital Projects, Health, and City Planning Commission, participate in the City's Place-Based Area Strategy for building strong, vibrant neighborhoods for all residents. With this approach, New Orleans has engaged in efforts to build community assets such as community centers, libraries, transit, goods, services, shopping areas, cultural activities, and parks.

HANO clients are overwhelmingly African-American and the demolition and redevelopment the "Big 4" public housing developments removed 5,000 units of public housing from the city's inventory and doubled the size of the HCVP. To mitigate the impact of this significant shift on African-American voucher holders, HANO enabled households to use vouchers to access housing throughout the New Orleans area and in other jurisdictions by not having onerous portability restrictions.

To mitigate the impact on this protected class, HANO offers homeownership and the ability to use vouchers to access housing throughout the New Orleans area and in other jurisdiction as well.

HANO's Homeownership Department assists public housing and HCVP residents with becoming first time homeowners. HANO screens and refers clients to HUD-approved homebuyer and financial fitness programs for the training and preparation required to meet first time homebuyer eligibility. HANO also recruits and trains lenders and real estate agents in the HCVP program. HANO staff also works closely with providers of soft second mortgages and other assistance programs and assists families with accessing such funding.

All HCVP participants are advised about the program's portability feature that allows voucher holders to move to any housing authority jurisdiction in the United States at the time of voucher issuance. HANO also absorbs voucher holders porting into New Orleans from other jurisdictions in order to facilitate the return of families displaced by Hurricane Katrina.

The City's Placed-Based Area Strategy has contributed to important investments in underserved areas but also requires some re-thinking as parts of some PBAs are now seeing increasing market activity and rising home prices. Specifically, property values and rents are climbing quickly in parts of Mid-City, Central City, the 7th Ward, and St. Roch. Community Development Block Grant (CDBG) funds are often used to fund the public

investments in these neighborhoods, and their use must affirmatively further fair housing. For example, \$1.85 million in CDBG-Disaster Recovery funding is slated for streetscape and drainage improvements along Oretha Castle Haley Blvd. in Central City. This corridor has seen significant public investment since the storm and is now seeing increased home and rental prices. While a significant amount of public sector resources were invested in Central City to support affordable housing development after Hurricane Katrina, continued capital investments are likely to attract more real estate interest and make it more difficult for lower-income long-time residents, who are disproportionately African-American, to stay and enjoy the improvements. Their displacement may contribute to segregation and reinforce R/ECAPs elsewhere in the city.

### 3. Contributing Factors of Segregation

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

- **Community Opposition**

Community opposition to low-income or mixed-income housing in higher opportunity neighborhoods has been a constant presence throughout New Orleans' rebuilding efforts. Intense neighborhood association opposition stymied a project in the Lower Garden District and led to the downsizing of the Muses Apartments a few blocks off of St. Charles Ave. and the Aloysius Apartments at the corner of N. Rampart and Esplanade. Most notably, pressure from neighborhood groups stalled an affordable housing development that included permanent supportive housing units at Esplanade and Broad, resulting in a U.S. Department of Justice lawsuit against the City and subsequent settlement that eventually allowed the project to be built. Other examples of community opposition are listed below.

#### Example of Private Developers' Opposition

Community opposition to affordable housing in neighborhoods and in the City is a contributing factor to segregation in New Orleans. In a recent Times Picayune article dated July 12, 2016, the homebuilding sector and related industries oppose Mayor Mitch Landrieu's initiative to create more affordable housing in New Orleans. The Homebuilders Association (HBA) of Greater New Orleans, states that requiring an affordable housing impact statement would stretch an already-thin city planning staff and create unnecessary delays for developers. HBA claims that inclusionary zoning has done little to add significant numbers of affordable units in other cities where it has been tried, citing Boston and San Francisco examples. Starting in 2000, Boston required developers to set aside 10 percent of units as affordable housing for projects seeking rezoning. It increased the rate to 13 percent in late 2015 -- after more than 3,600 affordable units were generated under the old standard. San Francisco voters approved agreed to allow city leaders to increase inclusionary standards for developments with more than 10 units. Instead of devoting 12 percent of units to affordable housing, the new rules call for up to 25 percent of units to be set aside. Development industry trade groups say the new standard will do more to discourage housing production, rather than promote lower housing prices.

[www.nola.com/realestate-news/2016/07/mayor\\_landrieus\\_affordable\\_hou.html](http://www.nola.com/realestate-news/2016/07/mayor_landrieus_affordable_hou.html)

### Examples of Neighborhood Group Opposition

The Muses Apartments generated some division between neighborhoods on either side of St. Charles Avenue. Central City residents, merchants, and church leaders said it would restore badly needed affordable housing to the neighborhood, while a number of Coliseum Square residents criticized both its design and its density. The development included 211 apartments in the first phase, roughly 65 percent of which would rent at market rates, with the remainder set aside as affordable housing. The City Planning Commission voted against the project in the face of such criticism, but the City Council later gave its approval after the developers reduced the number of apartments and otherwise tweaked the design.

[http://blog.nola.com/tpmoney/2009/06/new\\_apartment\\_project\\_taking\\_s.html](http://blog.nola.com/tpmoney/2009/06/new_apartment_project_taking_s.html).

- **Displacement of residents due to economic pressures:**

Gentrification of neighborhoods often leads to displacement of people of color as neighborhoods attract new residents interested in purchasing and rehabilitating properties. This may cause a rise in property values, increasing the rent for low-income residents as well as creating situations in which homeowners may not be able to afford to continue living in their neighborhoods due to increased property taxes. At the AFH Public Hearing residents expressed that housing affordability was their biggest problem and displacement due to economic pressures of not being able to remain in neighborhoods such as Tremé (as property values soar) was a significant challenge.

At an AFH public meeting, residents expressed that developers and new residents are constantly building and relocating from other states and pushing people out from better areas into slum areas thus increasing segregation. Residents also expressed concern that construction in lower-income, predominantly African-American areas is not as orderly as in more affluent areas. There is also concern that AirBnB rentals are decreasing opportunities for low-income renters throughout the City of New Orleans, particularly in high-opportunity neighborhoods.

- **Lack of private investments in specific neighborhoods:**

A few of New Orleans' PBAs need more private investments. Specifically, PBAs such as Gert Town, Hollygrove, and parts of the Upper 9th Ward have challenges due to the lack of private investments.

Residents also expressed that neighborhoods have no grocery stores or unaffordable grocery stores. They recommended a grocery store be built at Columbia Parc and in the Lower 9<sup>th</sup> Ward.

- **Lack of public investments in specific neighborhoods, including services or amenities:**

New Orleans' Place-Based Area Strategy has facilitated ongoing efforts to provide public investments in all neighborhoods throughout the city. However, two-thirds on online survey respondents expressed that public investments are not made fairly in all neighborhoods. At the first Public Hearing, residents also expressed that:

- There is an overall lack of big infrastructure to reduce flooding in poorer, predominantly Black neighborhoods; however, there is a huge infrastructure project to reduce flooding Uptown.
- Residents would like to see more equity in the construction, maintenance, and repair of levees, streets, potholes, and lighting in low-income African-American neighborhoods.
- A streetcar is under construction in the Bywater where public transportation already exists. People who need transit in poor Black neighborhoods have to walk a long way to get anywhere. Public transportation goes to affluent neighborhoods.

- **Lack of regional cooperation:**

Following Hurricane Katrina, the lack of regional cooperation contributed to segregation and adversely impacted affordable housing development in high opportunity areas.

On September 29, 2006, just thirteen months after Katrina, St. Bernard Parish passed the infamous “blood relative” ordinance. This novel discriminatory policy restricted home rentals to blood relatives of the owners defined as “within the first, second or third direct ascending or descending generations.” To rent to anyone else, landlords would need to obtain a Permissive Use Permit from the St. Bernard Parish Council. Violators of the ordinance, including *both* lessors and lessees, were subject to criminal prosecution and civil penalties, including a misdemeanor charge, a fine of between \$50 and \$250 per day for each day they were in violation of the ordinance, and a civil penalty of \$100 per day for each day of unpermitted rental, plus administrative costs, court costs and attorney fees for investigation and prosecution of the civil matter. <http://fusion.net/story/137351/how-racist-housing-laws-are-keeping-new-orleans-white/>

In addition, in 2008, St. Bernard Parish, after public meetings where officials and the citizenry vocalized racial fears about affordable rental housing, passed an ordinance banning the construction of affordable rental housing in the parish. The Greater New Orleans Fair Housing Action Center successfully challenged the parish’s actions in federal court. The Parish was forced to overturn the ordinance and grant a permit to Provident Housing to begin construction of an affordable housing development in the parish’s borders. <https://judiciary.house.gov/files/hearings/pdf/Perry100729.pdf>

In 2006, Volunteers of America sought federal tax credits to build a 200-unit complex for adults 62 years or older in Terrytown, which is located in Jefferson Parish. The Jefferson Parish Council unanimously objected to tax credits being used for the proposed development. In 2008, the Jefferson Parish Council voted to exclude the Council’s 1st District from a non-profit developer’s contract to build affordable housing in Jefferson Parish. In another instance, a developer decided to build affordable apartments in Algiers rather than Marrero after parish officials put a moratorium on developing the site. [http://www.nola.com/politics/index.ssf/2011/02/like\\_st\\_bernard\\_jefferson\\_pari.html](http://www.nola.com/politics/index.ssf/2011/02/like_st_bernard_jefferson_pari.html)

A resident from the first Public Hearing expressed that there is a great need for public transit to go from the City of New Orleans to Jefferson Parish where the jobs are located.

Other jurisdictions throughout the region, including St. Tammany Parish, have zoning and land use policies that afford extremely limited opportunities for the development of affordable, multi-family housing.

- **Lending Discrimination:**

From a review of the Home Mortgage Disclosure Act (HMDA) data for the 2015 year provided by the Consumer Financial Protection Bureau, it is clear that disparities exist in access to financial services. From the HMDA data, it was found that African-Americans originated 3,096 mortgages, but 2,669 were denied which is an 86% denial rate. Individuals that were identified as white originated 15,678 mortgages and 4,304 were denied which is only a 27% denial rate. The Asian population originated 421 mortgages and 162 were denied which is a denial rate of 38%. The Latino population originated 956 mortgages in the metro region but 476 were denied which is 50%. In addition, the Kirwan Institute's 2010 report, "Credit and Lending in Communities of Color," reported that consumers of color disproportionately pay more for auto financing, credit cards, private student loans, payday lending, car title loans, and other types of credit.

<http://kirwaninstitute.osu.edu/my-product/credit-and-lending-in-communities-of-color/>

Regarding discrimination against national origin groups in lending, a study on immigrant banking completed in 2015 by the Appleseed Foundation found that:

- Thirty-three percent of the banks and credit unions surveyed indicated that lack of bilingual personnel or having a language barrier was a problem. Uncertainty about government regulations, specifically Patriot Act requirements and proof of identity, created obstacles for 50 percent of participants.
- One institution listed determining credit history of immigrants as a particular issue while two others recognized that many people in the Latino community distrust mainstream institutions.
- Lack of locations in Latino-populated areas created barriers for three institutions.

<http://appleseednetwork.org/wp-content/uploads/2015/10/LA-Appleseed-Immigrant-Banking-Report1.pdf>

- **Location and type of affordable housing:**

Segregation patterns may continue in neighborhoods that have houses that are unaffordable for low-income minorities to purchase or rent. HUD maps reveal areas of White population concentration with virtually no affordable housing. The overwhelming majority of subsidized housing opportunities—whether HCVP, project-based voucher, public housing, LIHTC, or soft-second mortgages—are available in lower-income, majority African-American neighborhoods. Resident comments about affordable housing include:

- Concern that converting duplexes into single-family residences creates less affordable rental housing.

- The rent is too high and can require a family with four children to pay as much as \$1,200 a month to be comfortable.
- Coming out of a housing development is like, “[o]h my God, what am I going to do. I have to choose between being comfortable and pulling my child out of college.”
- HCVs are only for very, very, low-income people, and they cannot afford the rents in New Orleans.

- **Land-use and Zoning laws:**

In New Orleans current Comprehensive Zoning Ordinance (CZO), some neighborhoods are designated as “suburban neighborhoods residential districts” with codes S-RM1, S-RM2, S-LRM1, AND S-LRM2. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. The list of neighborhoods that are designated in the CZO are the same areas that are segregated with a majority white population according to HUD Maps displaying race.

- **Private discrimination:**

GNOFHAC's 2015 report "Where Opportunity Knocks, The Doors are Locked," showed that African-American prospective renters encounter housing discrimination nearly half the time when they seek housing in high opportunity neighborhoods. Equally qualified Black and White testers with matching incomes, career paths, family types, and rental histories attempted to view and apply for 50 apartment units in low-poverty neighborhoods like Lakeview, East Carrollton, Audubon, and Algiers Point. African-Americans were either denied the opportunity to rent or received less favorable treatment than White mystery shoppers 44% of the time.

GNOFHAC also released a report in 2015 on the prevalence of housing providers using criminal background checks as a pretext for discrimination. The report analyzes a testing investigation of 50 area housing providers, in which mystery shoppers posing as prospective renters inquired about rental availability and the apartment’s criminal background policy. Of the 50 site-visit tests conducted, African-American testers experienced discrimination 50% of the time. Testing revealed that agents often provided inconsistent information about background policies, and that white prospective tenants were much more likely to be quoted more lenient policies. Further, policies that were either discretionary—that evaluated prospective tenants on a “case by case” basis—or ambiguous favored White prospective tenants over African-Americans 55% of the time.

**ii. R/ECAPs**

**1. Analysis**

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

Based on Map 1 from the AFFH Data & Mapping Tool, the following areas were identified as R/ECAP areas:

Upper 9th Ward area

- North Claiborne to St. Claude and Forstall to Tupelo
- Lesseps to Congress and Derbigny to Urquhart

New Orleans East

- Florida Avenue/Peoples Avenue and Chef Menteur to Intracoastal Waterway

St. Bernard area

- Robert E. Lee to City Park Avenue and Marconi Drive to Wisner Blvd

7th Ward area

- North Broad to St. Claude Avenue and Elysian Fields to St. Bernard Avenue
- Small portion of St. Bernard to Esplanade and N. Prieur to St. Claude Avenue

8th Ward area

- Elysian Fields to Almonaster and Law to St. Claude Avenue

Iberville area

- North Claiborne to Basin Street and St. Louis to Iberville Street

Lafitte area

- North Claiborne to North Broad and St. Philip to St. Louis Street

Mid-City area

- St. Louis to Canal Street and N. Carrollton to N. Claiborne
- Canal Street to Tulane Avenue and Jeff Davis Pkwy. to Claiborne

Central City area

- O.C. Haley to Joliet Street and Pontchartrain Expy to Toledano/Washington
- St. Charles Avenue to O.C. Haley and 1st Street to Peniston
- (Magnolia area) S. Claiborne to LaSalle St. and Napoleon to Louisiana Avenue

Gert Town area

- Palmetto to Pontchartrain Expy and S. Carrollton to Hamilton

BW Cooper/Marrero Commons area

- US 90/Pontchartrain expressway to Washington Avenue and South Broad Street to South Claiborne Avenue

Tulane/Gravier – Canal St. to US 90/Pontchartrain expressway and South Claiborne Avenue to Jefferson Davis Parkway

Leonidas area

- Leonidas to Monticello Avenue and Spruce St. to Plum St.

Fischer area/Tall Timbers

- US 90 to LB Landry and General DeGaulle

- b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

According to Table 4 from the AFFH Data & Mapping Tool, the largest demographic group living in New Orleans R/ECAPs is Blacks at 49,354 (84%). All other races and ethnicities combined add up to 9,343 (15%) of the population living in R/ECAPs. The total number of families living in New Orleans R/ECAP areas comprise of 12,642, and families with children living in New Orleans R/ECAPs comprise 5,906 (46.72%) households. The most prevalent country of origin of the population living in R/ECAPs is Honduras with 1,120 (1.91%) R/ECAP residents, and the next most prevalent country of origin is Mexico with 588 (1%) R/ECAP residents.

<b>R/ECAP Race/Ethnicity</b>	<b>#</b>	<b>%</b>
Total Population in R/ECAPs	58,697	-
White, Non-Hispanic	4,507	7.68
Black, Non-Hispanic	49,354	84.08
Hispanic	3,596	6.13
Asian or Pacific Islander, Non-Hispanic	453	0.77
Native American, Non-Hispanic	151	0.26
Other, Non-Hispanic	106	0.18

c. Describe how R/ECAPs have changed over time (since 1990).

One of the more significant trends is that, in 1990 and 2000, R/ECAP areas encompassed areas of high ground in the East and West Riverside, Irish Channel, Lower Garden District, Bayou St. John, and Bywater neighborhoods, as well as portions of the Esplanade Ridge. HUD's 2010 R/ECAP map shows that low-income people of color have been priced out of these areas and are now in areas at higher risk of flooding and farther from job centers and transit, such as New Orleans East.

<b>Race/Ethnicity</b>	<b>1990</b>		<b>2000</b>		<b>2010</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hispanic	164,396	33.08	128,857	26.59	104,770	30.47
Black, Non-Hispanic	304,943	61.36	326,018	67.26	204,866	59.58
Hispanic	17,149	3.45	14,812	3.06	18,051	5.25
Asian or Pacific Islander, Non-Hispanic	8,871	1.79	11,740	2.42	9,988	2.90
Native American, Non-Hispanic	587	0.12	1,423	0.29	827	0.24

## 2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

As the Data Center observes in its recent post-Katrina look at the region, the poverty rate of 27 percent in the city of New Orleans in 2013 was statistically unchanged from 2000. The city had about 33,000 fewer poor individuals in 2013 than in 2000, but the drop in the city's overall population left the poverty rate roughly the same.

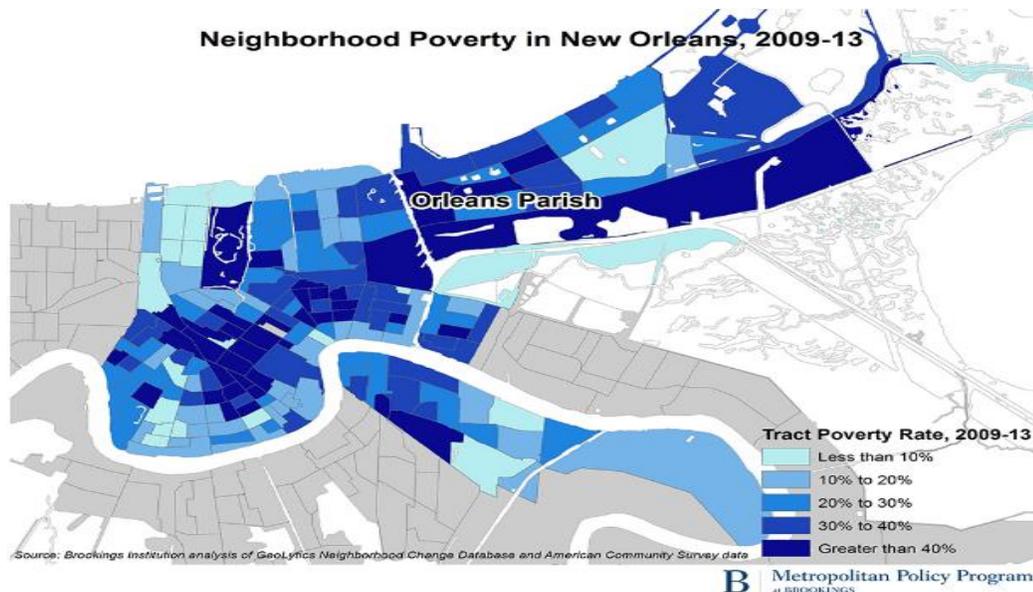
[http://www.datacenterresearch.org/reports\\_analysis/new-orleans-index-at-ten/](http://www.datacenterresearch.org/reports_analysis/new-orleans-index-at-ten/)

Analysis from Alan Berube and Natalie Holmes in an article on August 27, 2015 entitled "Concentrated poverty in New Orleans 10 years after Katrina" indicates that the share of the City's poor residents living in neighborhoods of extreme poverty dropped from 39 percent in 2000 to 30 percent in 2009-2013 (the latest small-area data available). This drop occurred at the same time that concentrated poverty rose dramatically in many major American cities, spurred by the Great Recession and slow recovery. Whereas New Orleans ranked second among big U.S. cities in concentrated poverty prior to the storm, it ranked 40th by 2009-2013.

<http://www.brookings.edu/blogs/the-avenue/posts/2015/08/27-concentrated-poverty-new-orleans-katrina-berube-holmes>

The maps below depict neighborhood poverty in 2000 in comparison to neighborhood poverty in 2009-2013.





- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City of New Orleans through a Place-Based Area Strategy for addressing the need for infrastructure, quality housing, transportation, economic development, and community investment in historically disinvested neighborhoods. This approach provides the opportunity to address challenges often identified in R/ECAP neighborhoods. The strategy directs new investments in a way that takes full advantage of prior investments.

The successful implementation of the PBA Neighborhood Strategy is dependent upon resident and neighborhood engagement. In all cases, the array of City facilities and investments align to address unmet demand for housing or support services for these communities. By encouraging applications to invest in these areas through the Notice of Funding Availability (NOFA) process, the City is confident of successful projects that will lead the way for greater neighborhood stability. As mentioned earlier in the Segregation/Integration section, the City realizes it must be careful to ensure that public investments in PBAs or R/ECAPs do not contribute to gentrification and displacement in pockets of growing market interest.

### 3. Contributing Factors of R/ECAPs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

- **Community Opposition:** Because opposition to affordable housing development often comes from those who have a disproportionate amount of political influence,

the opposition leads to developers withdrawing projects in high opportunity neighborhoods and placing them in areas of concentrated poverty where neighborhood residents are less likely to be able to influence land use planning processes. Opposition to broad legislative changes to zoning that would allow diverse housing types in all neighborhoods contributes to R/ECAPs. In addition, some types of zoning, particularly for planned developments and conditional zoning have discretion as a part of the approval process which creates disparities in types of developments allowed in certain neighborhoods.

- **Deteriorated and abandoned properties:** New residents are not moving to neighborhoods with high volumes of deteriorated and abandoned properties. At a public hearing, residents stated that efforts should be focused on substandard properties. There are far too many blighted properties in New Orleans. According to a New Orleans Advocate article on August 29, 2015, “Blight in New Orleans is back to pre-Katrina levels, but challenges remain”, the City of New Orleans estimated that there were about 28,000 blighted properties in the City which was around pre-Katrina blight numbers. The article points out that some neighborhoods fared better than others. Majority white neighborhoods like Lakeview only had about 2 blighted properties on the City’s list while majority African-American neighborhoods like the Upper 9<sup>th</sup> ward still has many vacant overgrown lots.  
[http://www.theadvocate.com/baton\\_rouge/news/article\\_91d27e96-ec2f-50bb-a205-48a394d128ab.html](http://www.theadvocate.com/baton_rouge/news/article_91d27e96-ec2f-50bb-a205-48a394d128ab.html)
- **Displacement of residents due to economic pressures:** Displacement due to economic pressures is a huge factor in neighborhoods like Treme as property values have increased by almost 50%, making it difficult for many long-time residents to remain in the neighborhood. This notion is underscored by a March 9, 2015 Times Picayune article entitled “Properties in Central City, Treme, 7th Ward and St. Roch draw most interest in New Orleans' online auction”, where the article discusses the high interest from investors in purchasing tax sale property which increases the value of properties.  
[http://www.nola.com/politics/index.ssf/2015/03/new\\_orleans\\_online\\_auction\\_tax.html](http://www.nola.com/politics/index.ssf/2015/03/new_orleans_online_auction_tax.html)

At a public hearing, residents commented that gentrification is causing low-income people of color to be pushed to areas with highly concentrated areas of poverty and fewer amenities and transportation options. This can exacerbate R/ECAP conditions.

- **Lack of community revitalization strategies:** Some of the R/ECAPs have little community revitalization activity. Residents expressed that it is difficult to find an affordable house as well as locate amenities such as healthcare, services, and overall healthy food in poor neighborhoods.
- **Lack of private investments in specific neighborhoods:** A few of the R/ECAPs have limited private investments, as the resident populations have not yet fully returned to the areas since Hurricane Katrina. A number of residents have complained that there is a significant lack of private investment in poorer Black neighborhoods. Poorer Black neighborhoods only have places like Walmart, Family Dollar, Dollar General, and community stores with limited healthy food choices for the purchase of groceries. Some of the R/ECAPs such as the Lower-Ninth Ward and New Orleans East have been facing challenges due to limited private investments as well as general services such as health care, grocery stores, retail outlets, and restaurants.

- **Lack of public investments in specific neighborhoods, including services or amenities:** At public hearings, residents expressed the following related to public investments:
  - The City should set better budget priorities by building less jails and putting more funds into affordable housing, schools, and youth improvement.
  - Residents also expressed concern about the amount of time it is taking to complete public housing projects like Guste and Florida.
- **Lack of regional cooperation:** Challenges still exist regarding the RTA working with the City of New Orleans to provide bus service to surrounding parishes in the region. At the first public hearing, residents expressed concerns that the regional transportation connections to Jefferson Parish are not good, especially from the New Orleans East area.
- **Land use and zoning laws:** Land-use and zoning laws need to be re-visited as they often present barriers to protected classes when trying to obtain quality housing in their neighborhoods of choice and, in particular, outside of R/ECAPs. The City is in the process of updating the City’s Master Plan which establishes allowable land uses throughout the City. At the first public hearing, residents expressed that short term rentals are causing evictions and will raise prices on rent for poorer people and low-income people of color in particular. Residents also expressed concern that zoning laws enforced through the CPC can keep poorer people out of neighborhoods by limiting the amount of affordable housing in certain areas.
- **Location and type of affordable housing:** Challenges exist regarding the location and type of affordable housing available in areas not designated as R/ECAPs. At the first public hearing, residents expressed the need for more affordable housing in areas that are not distressed.
- **Occupancy codes and restrictions:** Continued collaboration between OCD, Safety & Permits, and HANO is needed to address occupancy codes and restrictions that present challenges to our protected class. Resident at the first public hearing expressed concern over the conversion of duplex housing into single-family housing, saying that it reduces the supply of rental housing and keeps low-income people out of certain neighborhoods.
- **Private Discrimination:** At the first public hearing, some residents expressed that renters do not always know what their rights are. In addition, many residents do not feel they have power to hold landlords accountable.
- **Other:** Input provided at the public hearings as well as survey findings from residents in the community describe significant concern about slum landlords and how landlords expect tenants to make repairs to their homes. Commenters also expressed concern about public housing redevelopment and the re-concentration of poverty in farther flung neighborhoods.

iii. **Disparities in Access to Opportunity**

1. **Analysis**

a. **Educational Opportunities**

- i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

According to information from the Data Center in 2015 its report “The Transformation of New Orleans Public Schools,” pre-Katrina New Orleans had the next-to-lowest ranked public school district in the State of Louisiana. After a series of reforms in New Orleans, public education can be described as having one of the most dramatic before and after Hurricane Katrina images. Once managed by the Orleans Parish School Board, the traditional public school district received a \$1.8 billion dollar FEMA grant to build new and renovate existing school structures.

[http://www.datacenterresearch.org/reports\\_analysis/school-transformation/](http://www.datacenterresearch.org/reports_analysis/school-transformation/)

A study released by Tulane University’s Cowen Institute in 2010 articulated the changes to the traditional public school district after Hurricane Katrina. According to the study, the state shifted 107 low-performing OPSB schools into the Recovery School District (RSD). The RSD was charged with opening and operating those schools under its control for an initial period of five years. The OPSB retained control over 16 schools that had performed above the state average before Katrina. Both the OPSB and the RSD opened traditional schools and charter schools to serve the returning student population. As they reopened after Katrina, schools operated by both the RSD and the OPSB became city-wide access schools. This means that every public school, charter or directly-run, can be attended by any Orleans Parish student regardless of where they live in the Parish, provided there is capacity at the school of their choice. [www.coweninstitute.com/wp-content/uploads/2010/07/katrina-book.final\\_.CipageSmaller.pdf](http://www.coweninstitute.com/wp-content/uploads/2010/07/katrina-book.final_.CipageSmaller.pdf)

Although on the surface it appears that students have the ability to access more proficient schools, the below data captures issues that persist under the new structure.

According to a study done by the Southern Law Poverty Center (SLPC) analyzing the 2007-2008 school year:

- 98% of the students were African-American in the Recovery School District (RSD) which is the system that ran the majority of public schools in Orleans Parish. RSD took over low-performing OPSB schools at this time.
- 79% of students were low income in RSD schools.
- In the 2007-08 school year, approximately 28.8% of Recovery School District (RSD) students (3,537) were suspended from school. At the time of the study, the suspension rate in schools operated by the RSD is more than twice the state average and more than four times the national rate.
- Unlike the Recovery School District in Orleans Parish, in St. Tammany Parish, only 18.5% of students are African-American, 42.5% are low-income, and only 8% of students were suspended.
- In St. Charles Parish, where only 36.4% of students are African-American and 45.1% are low-income, only 4.1% of students were suspended from school.

According to a study done by the Cowen Institute analyzing the 2009-2010 school year, the vast majority of Orleans Parish public school students, over 90 percent, were African-American compared to 61 percent of the city’s population.

- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Although New Orleans youth can access schools in any area on the City, there is still a pattern that shows more proficient schools are located in predominantly White, affluent areas or close to those areas. For the 2015-2016 school year, the Cowen Institute prepared an analysis of the location of schools based on a letter grade to aid families in school selection. The Cowen Institute's analysis groups schools by five locations within the City. The letter grade is based on school performance scores (SPS).

<http://www.speno2014.com/governance-school-guide/>

This is illustrated below:

#### **Downtown/9th Ward**

- Of the six schools in this area, 33% of schools rated D, 33% rated C, and 33% rated B.
- One B school, McDonogh 15, is located in the majority White and affluent neighborhood of the French Quarter.
- The other B school is located in a majority African-American neighborhood where residents have a high rate of homeownership compared to other areas of New Orleans.

#### **Central City/Garden District**

- Of the nine schools in this area, 13% rated D, 50% rated C, 13% rated B, and one rated T. T indicates a school was recently taken over by a charter school due to it receiving a failing score from the prior school year.

#### **Uptown/Carrollton**

- Of the eight schools in this area, 63% were rated C, 25% rated B, and 12% rated F.
- The B schools are located in White affluent areas.
- The C schools are in mixed racial/ethnic and national origin zones.
- The F school is located in a R/ECAP area.

#### **Mid-City/Lakeview**

- Of the fifteen schools in this area, 13% rated F, 7% rated D, 33% rated C, 13% rated B, 20% do not have students in tested grades, and 13% were takeover schools with no scoring.
- Both F schools are located in areas near public housing. One is near BW Cooper/Marrero Commons public housing and the other F school is near St. Bernard/Columbia Parc public housing.
- The D school, Medard Nelson Elementary, is also near St. Bernard/Columbia Parc public housing.
- The B schools are located in areas with more White and affluent residents along Canal Street and S. Carrollton Avenue. .

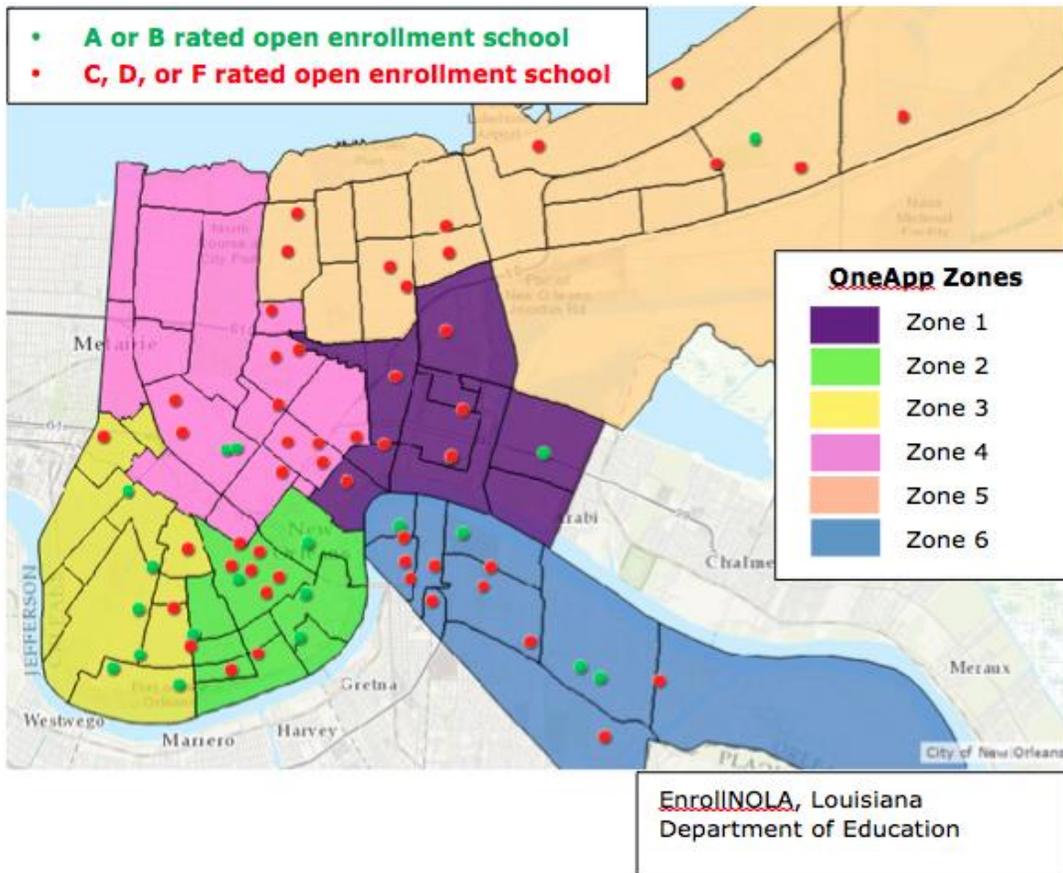
### Algiers/Westbank

- Of the eight schools in the area, 63% rated D and F. 25% were rated D and 38% were rated F. 25% rated B, and 13% rated A.
- Algiers has the only A rated school in Orleans Parish, Alice Harte. It is located in an upper middle class neighborhood, inhabited by a typical age distribution and moderately educated population. This area is also home to Edna Karr, a B rated school.
- The other B rated school, Martin Behrman, is located in the Algiers Point section which has increasingly become a more White and affluent area than other areas of the city since Hurricane Katrina.
- Two of the D schools are located near the Fischer public housing development.

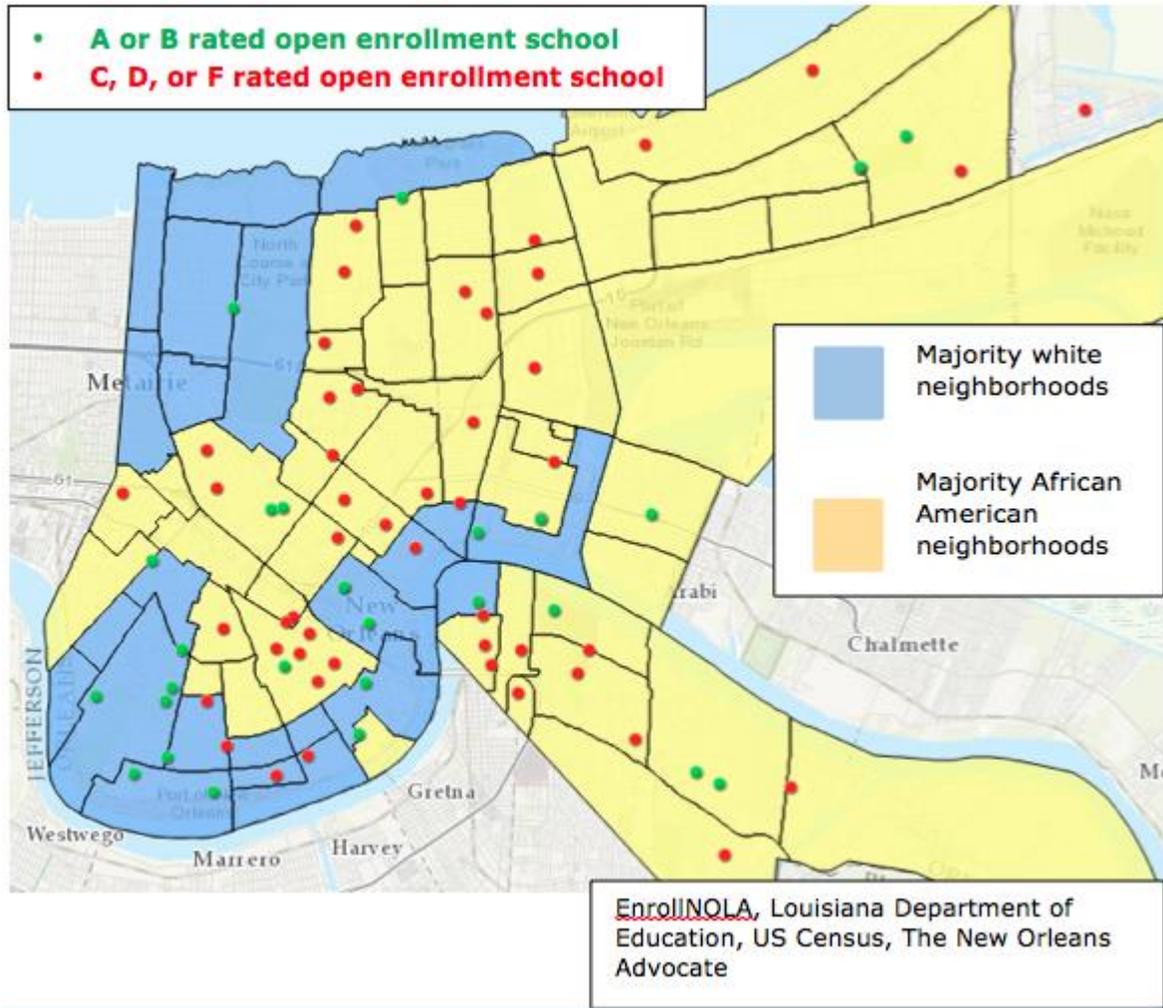
### N.O. East/Gentilly

- Out of 6 schools, 17% rated F, 17% rated D, 33% rated C, and 33% rated B.
- The F school is located in a R/ECAP area along Dwyer Road.
- The B schools are located in African-American neighborhoods that have a high incidence of homeownership with one school being in Pontchartrain Park and the other in Gentilly near Franklin Avenue.

The map below presents this data citywide for all schools in the OneApp system:



OneApp, the application and placement process for most New Orleans public schools, often gives preference to students applying to a school in their “Geographic Zone.” This may perpetuate existing segregation because many African-American students live in zones with few high quality schools, while many White students live in zones with A or B rated schools.



According to a report from the GNO Data Center entitled “The Transformation of New Orleans Public Schools: Addressing System-Level Problems,” as integration began in the late 1950s, Whites fled New Orleans public schools, and, by the 1970s, middle-class Blacks also began abandoning the city’s public schools, leaving behind a high population of low-income African-American students. Just before Hurricane Katrina in 2005, the New Orleans public school population was 94% African-American, with 73% qualifying for the free or reduced lunch program (the citywide child poverty rate in 2005 was 41%). Prior to Hurricane Katrina, like the vast majority of the nation’s school districts, OPSB schools were arranged by neighborhood zones. After 80% of New Orleans flooded as a result of Hurricane Katrina, the number of available schools dropped, resulting in the removal of attendance zones. In an effort to promote fairness, equity, and transparency for the school application process, the Recovery School District created a centralized enrollment system called OneApp.

[http://www.datacenterresearch.org/reports\\_analysis/school-transformation/](http://www.datacenterresearch.org/reports_analysis/school-transformation/)

- iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

### **Policies affecting ability to attend a proficient school**

The below information is based on a 2007 report by the Boston Consulting Group entitled "State of Public Education in New Orleans" and depicts how school-related policies developed after Hurricane Katrina affected attendance at proficient schools by protected class groups.

<https://www.bcg.com/documents/file15048.pdf>

- From 1995 to 2005, public school enrollment in Orleans Parish decreased 25 percent, while non-public school enrollment increased by 5 percent as a result of the public school system's inadequacies. Many families with the financial means took their children out of public schools.
- In December 2005, in light of its precarious financial situation and the loss of most of its schools, the Orleans Parish School Board fired 7,500 school district employees that had not already been rehired by one of its remaining schools. This resulted in a decrease in the number of veteran teachers. Whereas approximately 40 percent of teachers had more than 20 years of experience before Katrina, after the mass firing, in the second full school year after the storm, 2007-2008, more than half of all teachers had three or fewer years of teaching experience.
- In 2008, the OPSB and the RSD adopted a comprehensive plan to renovate, rebuild, or land bank existing buildings over the next ten years which should give more students access to improved facilities.
- RSD students are suspended at a rate that is more than three times the rate of suspension in neighboring, mostly White, affluent school districts in the region.
- The expulsion rate in the RSD was almost twice the statewide rate, and 10 times the national rate which demonstrated the lack of proficiency during this time to maintain students in a learning environment.

Seven of the highest ranked public schools in New Orleans (see chart below) do not participate in OneApp. Their application and enrollment processes are demanding on parents' schedules and require access to transportation. These schools often expect parents to deliver parts of the application during school hours and also require parent meetings and student exams.

	<b>Economically disadvantaged</b>	<b>Students w/ disabilities</b>	<b>% African America</b>
<b>Lusher Charter School</b>	21%	<5%	29%
<b>Benjamin Franklin High School</b>	30%	<5%	32%
<b>NOCCA</b>	35%	N/R	25%
<b>Edward Hynes Charter School</b>	41%	10%	42%
<b>Audubon Charter School</b>	44%	7%	45%
<b>Lake Forest Charter School</b>	60%	8%	90%
<b>Robert Russa Moton Charter School</b>	94%	<5%	95%
<b>Average of all New Orleans public schools</b>	84%	11%	87%

Louisiana Department of Education, NOLA.com

### **Students with Disabilities**

The Southern Poverty Law Center’s report entitled “Access Denied: New Orleans Parents and Students Identify Barriers to Public Education” discusses the policies that create barriers to students with disabilities attending proficient schools.

[www.splcenter.org/sites/default/files/d6\\_legacy\\_files/downloads/publication/SPLC\\_report\\_Access\\_Denied.pdf](http://www.splcenter.org/sites/default/files/d6_legacy_files/downloads/publication/SPLC_report_Access_Denied.pdf)

The findings were as follows:

- Since 2007, the percentage of students with special education designations had steadily risen, from 6 percent in 2007 to 8 percent in 2009; however, some students with disabilities in New Orleans public schools were completely denied enrollment as a result of their disability or forced to attend schools lacking the resources necessary to serve them and suspended in record numbers.
- The graduation rate for RSD students with disabilities was less than half of the overall graduation rate and only 6.8% of RSD students with disabilities exited with a high school diploma while the statewide average was 19.4%.
- In the 2008-09 school year, RSD schools suspended nearly 30% of all students with disabilities — a rate that was 63% higher than the state average.
- During the 2007-08 school year, 94.6% of eighth grade RSD students with disabilities failed the Louisiana Educational Assessment Program (LEAP) exam. For the same year, 78.3% of all eighth grade charter school students with disabilities failed the LEAP.

- On average, school districts throughout Louisiana have identified 12.2% of their students as eligible for special education services. New Orleans Public Schools have identified only 8% of their students as eligible for special education services. Comparable school districts throughout the country identify almost twice as many students with disabilities.

### **Students with LEP**

Students with limited English proficiency (LEP) are primarily protected class members as discrimination on the basis national origin is prohibited under the Fair Housing Act. LEP students also have been reported to face barriers to attending proficient schools in New Orleans.

- In 2013, the Vietnamese American Young Leaders Association and the Asian American Legal Defense and Education Fund filed a Complaint with the U.S. Department of Education alleging that the school district violated Title VI of the Civil Rights Act of 1964 by failing to meet the language needs of Asian American and Latino LEP students. District-wide, these students and their families have been underserved, severely damaging their quality of education and putting them at a huge disadvantage in their efforts to attain success in their schools. <http://aaldef.org/press-releases/press-release/groups-file-doj-complaint-on-failing-language-services-in-new-orleans-schools.html>
- Approximately 54.9 percent of Asian and Latino students said that there are no teachers or staff at their school who speak their parents' native language. (<http://ryhcnola.org/wp-content/uploads/2013/02/ESL-Lost-In-The-Sytem-2013.pdf>)
- Only 16 percent of students from LEP families classified said that their parents are offered interpreters or translators for important school meetings. <http://theadvocate.com/news/neworleans/5770545-148/new-orleans-students-find-shortcomings>

In New Orleans, “school choice” refers to the range of policies that allow parents to select the school they want their children to attend. Prior to Hurricane Katrina, schools were arranged in neighborhood zones, much like the majority of the school districts throughout the country. Schools would primarily enroll students from their respective zones and would accept students from outside their zone if there was a seat available. Delivery of public education changed dramatically in New Orleans after Hurricane Katrina; however, student demographics have remained similar. According to the Data Center study, New Orleans public schools are only slightly more diverse than before the storm. White enrollment has moved slightly upward from 3% in 2004-2005 to 6% at the start of the 2014-2015 school year. The Data Center study notes that Whites are concentrated in schools with selective admission tests authorized by the Orleans Parish School Board. In addition, an influx of Hispanics to New Orleans and the surrounding region has resulted in an increase in the proportion of Hispanic students in the public school system from 1% in 2004-2005 to 5% in 2013-2014. As stated above, in 2004-2005, African-American student enrollment in New Orleans public schools was 94%, and in 2013-2014 enrollment went down slightly to 87%. According to the Data Center, the overrepresentation of poor, Black students in public schools is largely due to the fact that White and middle-class families opt out of the public school system and choose private and parochial schools at significantly higher rates in New Orleans. Only 10 percent of students nationwide attend private schools. In New Orleans, 25 percent of students attend private/parochial schools.

[http://www.datacenterresearch.org/reports\\_analysis/school-transformation/](http://www.datacenterresearch.org/reports_analysis/school-transformation/)

## **b. Employment Opportunities**

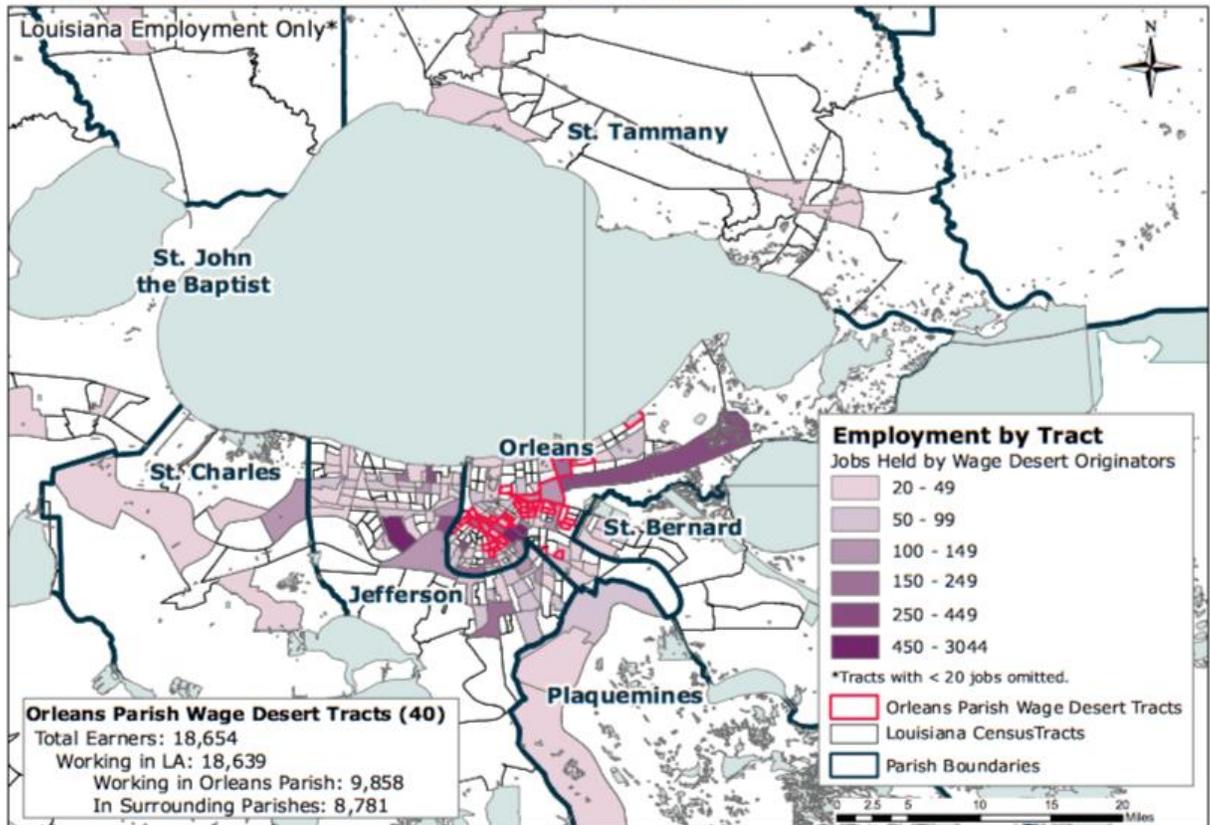
- i. Describe any disparities in access to jobs and labor markets by protected class groups.

There are clear disparities indicated in access to jobs and labor markets in light of the Jobs Proximity and Labor Market indices included in Tables 12 and Maps 10 and 11 of the AFFH Data & Mapping Tool. In these indices, higher scores indicate higher levels of labor engagement and closer proximity to jobs. Disparities noted are:

- The White population has a very high score of 73.88 which indicates extremely high levels of labor engagement, but all other racial and ethnic groups have far lower indices, approximately 30 points lower for one group and almost 45 points lower for another.
- The Black population has an extremely low opportunity to access labor with a score of 29.28. Hispanics have a score of 48.22, Asians and Pacific Islanders a score of 42.68, and Native Americans a score of 47.56.
- The White population also lives closer to jobs with a score of 55.71 under the Jobs Proximity Index, but the Hispanic population is not far behind with a score of 52.64. The Hispanic population in New Orleans tends to be concentrated in Lower Mid-City, which is close to many job centers, but is also facing serious development pressures and is at risk of gentrification. With few protections for tenants, this group may soon be facing displacement to areas farther from jobs.
- The Asian and Pacific Islander and Native American populations also appear moderately close to jobs with scores of 48.78 for Asians and Pacific Islanders and 46.41 for Native Americans.
- Again, the Black population has the lowest access to opportunity, being farther away from jobs with a score of 40.10 which is over 15 points below the White population.

Jobs in New Orleans are spread out across the city and metro area, with most jobs concentrated in the following major clusters: the Central Business District (CBD)/French Quarter, Veterans/Causeway/I-10 area, and the greater Elmwood Corridor, according to a 2015 study “Persistent Low Wages in New Orleans' Economic Resurgence” conducted by the GNO Data Center. Statistics from the Data Center show that Jefferson Parish has more low-wage jobs than Orleans Parish. Jefferson has more than 108,000 low-wage jobs paying less than \$3,333 a month, with nearly 22,000 (51%) of these workers commuting into the parish for work while Orleans Parish has 84,000. Nearly half (48 percent) of metro New Orleans’ low-earning workers commuted outside of their home parish for work in 2011, up from 44 percent in 2002. The Data Center characterizes areas where at least 80% of all earners are earning less than \$3,333/month as "wage deserts" and notes that 40 of the 44 wage deserts in the metro area are in New Orleans. Workers living in "wage deserts" were more likely than their counterparts in higher earning areas to commute out of parish. The following Data Center map identifies Orleans Parish wage deserts and shows where these low-wage workers tend to work.

**Figure 4: Place of Work (Destinations) of Orleans Parish Residents Originating in Wage Desert Census Tracts**



Source: LEHD Origin-Destination Employment Statistics, 2011, Origin Destination (OD)

ii. How does a person’s place of residence affect their ability to obtain a job?

According to an article published in the *City Observatory* on March 27, 2015 entitled “How Important is Proximity to Jobs for the Poor,” place of residence affects one’s ability to obtain a job because the closer in proximity to the majority of jobs, the less one has to rely on personal vehicles or public transportation to seek and/or maintain a job. Some jobs are inaccessible unless one has the means to afford a personal vehicle. People living in the R/ECAPs of New Orleans have more challenges finding a job because there are fewer opportunities for employment in their neighborhoods and a lack of reliable high-frequency public transit. <http://cityobservatory.org/how-important-is-proximity-to-jobs-for-the-poor/>

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Based on the Jobs Proximity and Labor Market indices, the Black population is the least successful in accessing employment with a dismal score of 29.28 which is 44 points below the White population (73.88) and almost 20 points below the Hispanic population (48.22).

Although the Hispanic population’s access to jobs is greater than other minority groups, Map 11 reflects that those of Honduran national origin appear to be less likely to have opportunity to access the labor market.

The Vietnamese population also seems to be less likely than other national origin groups to have access to the labor market. Contributing factors to this observation are likely language barriers and the fact that the largest Vietnamese community in the city is located far from job centers in New Orleans East.

With regard to family status, areas with greater access to the labor market generally have between 0 to 20% households with children. Areas with less access to the labor market tend to have between 80 to 100% households with children.

According to a report issued by the City of New Orleans NOLA for Life Program in August 2014, the young African-American males living in concentrated areas of poverty are the least successful in accessing employment due to lack of education, criminal records, lack of transportation, and a lack of access to networking.  
[http://www.nolaforlife.org/images/economic-opportunity/bmu-report\\_final\\_pages2/](http://www.nolaforlife.org/images/economic-opportunity/bmu-report_final_pages2/)

**c. Transportation Opportunities**

- i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

Based on the Transit Trips, access to transportation is as follows:

- Hispanic population has greatest access to transportation. 63.36
- White population is second. 63.12
- Native American population is third. 63.08
- Black population is fourth. 60.72
- The Asian population has the least access. 56.58

HUD Table 12 also indicates that the cost for transportation is not highly disparate in relation to race and ethnicity. The cost of transportation for racial and ethnic groups is as follows:

- Hispanic population has the lowest costs for transportation. 65.40
- White population is second. 64.53
- Native American population is third. 64.53
- Black population is fourth but nominal difference. 60.53
- The Asian population has the least access. 51.21

Though the HUD indices suggest there are minimal racial disparities in access to transportation, local data presented below presents the opposite view.

- ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

The Asian population is most affected by lack of access to transportation and lack of affordable transportation based on Table 12. Within the Asian population, the national origin group that is most affected by lack of access to transportation and lack of affordable transportation is the Vietnamese population according to Map 12. This is consistent with the concentration of Vietnamese residents in New Orleans East, one of the least transit-accessible parts of the city

Family Status - According to Map 12, in areas with lower transportation costs and lower transit times, approximately 0 to 20 % of families have children, and, in areas with greater transportation costs and greater transit times, between 80 to 100% of families have children.

- iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

According to the U.S. Department of Transportation's April 2007 report entitled "Realizing the Potential: Expanding Housing Opportunities Near Transit," the average American family spends more than half of their income on housing and transportation. The average family spends 19 percent of the household budget on transportation, and households in auto dependent neighborhoods spend 25 percent while households with good access to transit spend just 9 percent. So while a growing number of families are moving further out to suburban or even exurban locations to find affordable housing, the rising cost of transportation reduces much of their cost savings. As a result, demand for housing near transit, which helps contain transportation costs, is expected to grow over the next 20 years.

<http://www.reconnectingamerica.org/assets/Uploads/2007RealizingthePotentialweb.pdf>

Based on this projection, public transportation routes and transportation systems designed for use of personal vehicles can impact protected class groups' access to opportunity, as the more one spends on transportation the less one has to spend towards quality housing, education, and other needs. Below is a look at the various modes of city and regional transportation and how they affect protected class groups.

### **New Orleans Transportation**

**Public Transportation:** According to the "State of Transit" report published by Ride New Orleans in 2015, RTA continues to operate less transit service than it did before Katrina. Ride New Orleans has indicated that before Katrina, RTA buses and streetcars made more than 17,000 trips each week, and, by 2015, that number had fallen to just 7,813 which represents a 55% decline in available transit service. This lowers the accessibility of affordable transportation for families that may not have the means to own a personal vehicle. It may also increase transit times which can reduce access to resources because of the many transfers that may be necessary to access jobs and other resources. <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>

The Ride New Orleans report indicates the neighborhoods that are most affected by the reduced transit service are in R/ECAP areas. According to the report, those hardest hit have seen only 20% to 40% of their transit service recovered. These neighborhoods include: Little Woods, West Lake Forest, Desire, Read Blvd West, Filmore, Viavant / Venetian Isles, Lake Terrace & Oaks, Lower Ninth Ward, Read Blvd East, Pontchartrain Park, Village de l'est, Bywater, Hollygrove, St. Claude, Lakeshore / Lake Vista, Dillard, the 7th Ward, Tremé/Lafitte, St. Bernard Area, Tulane / Gravier, St. Roch, St. Anthony, Pines Village, and Marigny. This lack of reinvestment disproportionately affects neighborhoods of color.

In addition, streetcars have taken prominence over buses according to Ride New Orleans. Although streetcars offer more frequent rides, they are mostly placed in areas with disproportionately White and affluent populations. Ride New Orleans identifies the lines with the most frequent streetcar service as #12 St. Charles Streetcar, Loyola-UPT Streetcar, Canal-Museum/City Park Streetcar, Canal-Cemeteries Streetcar, and the Riverfront Streetcar. On

average, New Orleans' five streetcar lines provide service every 17 minutes during peak hours. Bus riders, however, often have to wait twice as long with the average peak hour frequency of all of RTA's bus routes combined at 38 minutes.

RIDE's 2016 State of Transit also includes an analysis of the percentage of jobs in the region that are accessible by a transit or walking commute of 30 minutes or less. In many majority African-American areas farther from the city center—like Gentilly, New Orleans East, the Lower 9th Ward, and Algiers—less than 10% of the region's jobs are accessible by a 30 minute transit commute. The only area where more than 30% of regional jobs are available in a 30 minute transit commute is the Central Business District, which is majority White.

**Lack of Light Rail Express Transportation:**

RTA boasts that the authority has been at the forefront of the light rail system renaissance for decades by operating three rail lines: the historic St. Charles Avenue Streetcar line, the Canal St. Streetcar line, and the Riverfront Streetcar line. These rail lines transport more than 15,000 riders to work, school, and entertainment venues every day. <http://www.norta.com/Media/News-Events/New-Orleans-Rail-A-Historic-Asset-Paving-the-Way-t.aspx>. However, the number of riders served is less than 4% of the New Orleans population, and the lines are concentrated in the affluent, predominantly White neighborhoods of the Garden District, Mid-City, and the French Quarter.

The lack of accessibility to the St. Charles Streetcar for people with disabilities and the general disrepair of New Orleans streets and sidewalks make it difficult for people with disabilities to use public transit and to traverse the city.

**Transportation with Personal Vehicles:**

Post-Katrina, the share of New Orleans households without access to a vehicle has dropped from 27 percent in 2000 to 19 percent in 2014, according to the June 2016 Data Center report, "Who Lives in New Orleans and Metro Parishes now." The Data Center concludes that at 19 percent, New Orleans' percentage of individuals without access to vehicles is more than twice as high as in neighboring parishes and the nation, indicating the importance of a robust public transportation system. <http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/>

**Regional Data on Connectivity:**

As documented in a Harvard study released in April 2015, commuting time has emerged as the single strongest factor in the odds of escaping poverty. "The longer an average commute in a given county, the worse the chances of low-income families there moving up the ladder. The relationship between transportation and social mobility is stronger than that between mobility and several other factors, like crime, elementary-school test scores or the percentage of two-parent families in a community." [http://www.equality-of-opportunity.org/images/nbhds\\_exec\\_summary.pdf](http://www.equality-of-opportunity.org/images/nbhds_exec_summary.pdf)

The Coordinated Public Transit-Human Services Transportation Plan completed by the Regional Planning Commission (RPC) of Jefferson, Orleans, Plaquemines, St. Bernard, and St. Tammany Parishes admits that during planning there was a consistent theme concerning lack of regional connectivity, particularly when transferring from one system or mode to another.

This is a particular problem given the high share of low-wage workers commuting to jobs outside of New Orleans noted in the employment section above.

**Public Transportation:**

In an earlier RPC study conducted in 2012 entitled “Origin Destination study,” the RPC demonstrated that trips are often regional in nature. According to the same study more than half of all trips on the fixed route public transportation system require at least one transfer. These issues are exacerbated for transportation disadvantaged populations, especially for persons who rely on the public transportation system for most or all of their travel needs. Such riders may have non-traditional trip purposes (such as medical or non-peak hour/weekend employment trips) and unique limitations on time and resources. They may also have a far more difficult challenge navigating a complicated system. From an operator perspective, poor connectivity may lead to an inefficient and undesirable system as well as increased rider reliance on an expensive paratransit system. [http://www.norpc.org/assets/pdf-documents/studies-and-plans/Coordinated%20Plan\\_2013.pdf](http://www.norpc.org/assets/pdf-documents/studies-and-plans/Coordinated%20Plan_2013.pdf)

**Lack of Light Rail Express Transportation:**

In June 2005, prior to Hurricane Katrina, the RPC released a policy plan for transit oriented development entitled “New Orleans Light Rail Transit Project.” This policy plan supported the development of a Light Rail Transit project between the Louis Armstrong International Airport in Jefferson Parish and downtown New Orleans.

According to an article in the Times Picayune on July 17, 2014, Veolia Transportation, which manages the RTA, envisions light rail or express bus service to the airport.

[http://www.nola.com/politics/index.ssf/2014/07/new\\_orleans\\_rta\\_unveils\\_35\\_bil.html](http://www.nola.com/politics/index.ssf/2014/07/new_orleans_rta_unveils_35_bil.html)

**Transportation with Personal Vehicles:**

A route that connects New Orleans to Jefferson Parish was voted as the nation’s 30<sup>th</sup> worst corridor by the Daily Beast in its article entitled “America’s 50 Worst Commutes.” The specific route encompasses I-10 Westbound from Causeway Blvd./Exit 228 through West End Blvd./Florida Blvd. Regarding the creation of exit-only lanes on this route in an attempt to alleviate congestion, Chris Morvant, a state transportation engineer, stated that “the idea is to separate traffic according to where people want to go and eliminate the need to try to merge over, which slows things down, especially in heavy traffic.”

<http://www.thedailybeast.com/articles/2011/03/08/50-worst-commutes-americas-highways-to-hell.html>

In addition to the congestion on I-10 going towards Metairie, RPC has been also trying to alleviate congestion on I-10 in the direction of the Westbank by installing ramp meters along Pontchartrain expressway, according to a July 2016 Times Picayune article. “The meters are designed to reduce traffic congestion, improve travel time and ensure safer merging,” Department of Transportation and Development Secretary Shawn D. Wilson said. He said in a released statement that the technology would allow for goods and services to be “delivered in a more efficient and timely manner” more safely during rush hour. However, Iherif Ishak, a civil engineering professor at Louisiana State University, recommended more research to figure out “the nature of the congestion problems” in New Orleans and to ensure that ramp meter strategies work. [http://www.nola.com/traffic/index.ssf/2016/07/new\\_orleans\\_ramp\\_meters\\_set\\_to.html](http://www.nola.com/traffic/index.ssf/2016/07/new_orleans_ramp_meters_set_to.html)

**d. Low Poverty Exposure Opportunities**

- i. Describe any disparities in exposure to poverty by protected class groups.

In New Orleans, African-Americans are the protected class with the highest exposure to poverty. Their exposure is extremely high with an index of 18.23 where, the higher the

score, the less exposure to poverty. Unlike the Black population, the White population has a score of 53.52 showing much less exposure to poverty and even the Hispanic, Asian, and Native American populations have much less exposure to poverty than Blacks. Table 12 indicates the disparities in exposure to poverty by protected class are as follows:

- Black population has the highest exposure to poverty at 18.23.
- Native Americans have the next highest exposure to poverty at 30.75.
- Hispanic residents have slightly lower exposure to poverty at 31.10.
- Asians and Pacific Islanders have slightly lower exposure to poverty at 33.81.
- White residents have the least exposure to poverty at 53.52.

The region is consistent with the New Orleans metropolitan area in that the protected class with the most exposure to poverty is African-Americans.

- ii. What role does a person's place of residence play in their exposure to poverty?

According to an article published by the Metropolitan Policy Program at Brookings entitled "Concentrated poverty in New Orleans 10 years after Katrina," the share of the city's poor residents living in neighborhoods of extreme poverty dropped from 39% in 2000 to 30% in 2009-13. This drop in poverty partly stems from the disproportionate inability of African-Americans return home after the storm. The Brookings study uses data from the American Community Survey and the Geolytics Neighborhood Change data base and finds that there are many very poor neighborhoods in New Orleans and that, in 2009-2013, 38 of the city's 173 census tracts had poverty rates exceeding 40%, down only slightly from 41 census tracts in 2000. These high-poverty neighborhoods have been slower to rebuild in the aftermath of Hurricane Katrina than other neighborhoods.

To examine the disparities in exposure to poverty further, information from the GNO Data Center shows that the geographies of poverty in New Orleans follow a consistent pattern that is neighborhood specific and consistent with the R/ECAPs identified in Map 14. Poverty indicators for majority African-American neighborhoods in R/ECAP areas are consistent with geographic patterns that are also correlated with low-income, low-educational attainment, less access to transportation, and high rent cost-burden. In addition, Hurricane Katrina revealed disparities in exposure to poverty among those in the protected classes. African-American low-income people living in parts of New Orleans that were flood prone, such as the Upper and Lower 9th Wards, 7th Ward, Gert Town, Mid-City, and New Orleans East that experienced total loss of property, as well as challenges returning home after the storm. Prior to the storm, these areas were considered areas of concentrated areas.

- iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

Table 12 indicates the following:

The racial/ethnic groups most affected by these poverty indicators are Black residents with a very low score of 14.40, as compared to White residents with a comparatively high score of

47.33. Also, on a regional level the group most affected by poverty indicators is Black residents with a low score of 26.51, as compared to Whites with a high score of 56.49.

The national origin group most affected by these poverty indicators are Honduran residents who live mostly in areas with a poverty index of 0 to 10.

Table 12 also shows that census tracts where families with children comprise 60% or more of the households are more likely to be areas with high exposure to poverty. In addition, the Data Center reports that the child poverty rate in New Orleans is fully 17 percentage points higher than the national average. 39 percent of New Orleans children live in poverty. Moreover, it is higher than in many comparable U.S. cities. Among the 39 cities with populations between 275,000 and 600,000, New Orleans has the ninth highest child poverty rate. [http://www.datacenterresearch.org/reports\\_analysis/new-orleans-kids-working-parents-and-poverty/](http://www.datacenterresearch.org/reports_analysis/new-orleans-kids-working-parents-and-poverty/)

- iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

From a review of HUD data and local data the following assessments were made:

Jurisdictional and regional policies inhibit the ability of protected class groups to access low poverty areas through zoning laws restricting certain housing developments in specific neighborhoods. By restricting pre-fabricated housing and multi-family dwellings, particularly public housing projects, in middle and upper-middle income neighborhoods, local governments limit the protected class groups' opportunity to gain access to low poverty areas. In addition, there are many neighborhoods in New Orleans that are classified as historic districts. Adhering to housing preservation regulations in those neighborhoods can often be too costly for low-income residents and affordable housing developers to afford.

Due to significant investment in downtown urban areas, many groups with means are returning to downtown living which creates a housing demand that results in increased rents and inflated home values. These investment policies affect the ability of protected class groups to access low poverty areas because these areas become less affordable as the demand for housing increases.

Transportation policies also affect the ability of protected class groups to access low poverty areas. A number of households in need of subsidized housing have had to access housing outside of low poverty areas as the increase in rent in low poverty areas drove those households toward lower rent areas like New Orleans East, which have fewer public transportation services. New Orleans East has less transportation services because transportation policies have resulted in an increase in streetcars in downtown areas but have not increased bus service for remote areas like New Orleans East. In addition, the development of a light rail system not been a part of any transportation plan. Therefore, without a car, disproportionately African-American and Vietnamese families are hindered from accessing areas of low poverty.

The lack of mobility counseling and Small Area Fair Market Rents can impede voucher holders ability to access lower-poverty neighborhoods.

Conversely, development of HANO scattered sites in high-opportunity neighborhoods would allow protected classes to access lower-poverty neighborhoods.

Public investments in gentrifying neighborhoods without complementary investments in affordable housing make it harder for protected classes to stay in neighborhoods as they become more affluent.

**e. Environmentally Healthy Neighborhood Opportunities**

- i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The Environmental Health Index provided by the Table 12 and Map 15 measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by specific neighborhoods in New Orleans.

According to the HUD index, access to environmentally healthy neighborhoods is about the same for White, Black, Hispanic, and Native American populations. All of these populations have high exposure to carcinogenic, respiratory and neurological toxins as indicated by the low scores on the HUD Environmental Health Index as follows:

White - 27.22	Black - 26.92
Hispanic - 26.89	Native American – 25.37

The Asian Pacific Islander population based on the index has less exposure than other populations in New Orleans with a score of 37.27.

In addition to the Environmental Health Index that indicates exposure to air quality toxins, New Orleans residents also encounter additional environmental health hazards such as elevated highways, lead in the soil, industrial plants, and waste sites.

Lead: New Orleans has a high prevalence (61%) of lead above recommended levels in soil and dust samples in and around residences. This information was obtained from a cross sectional study done by Louisiana researchers to assess the distribution of residential soil and lead dust two years after Katrina, comparing soil levels before and after Katrina. 109 households were enrolled, and 61% had at least one lead measurement above federal standards. Of homes with bare soil, 47% had elevated lead, and 27% had levels exceeding 1,200 parts per million. Housing age was associated with soil lead, and housing age and soil lead were associated with interior lead. Race, income, and ownership status were not significantly associated with either interior or exterior lead levels. The median soil lead level of 560 parts per million was significantly higher than the median level of samples collected before Hurricane Katrina. See "Environmental Lead after Hurricane Katrina." <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3346792/>

Elevated Highways: An organized preservation effort led to the 1969 defeat of a six-lane elevated riverfront expressway proposed for the Vieux Carré. The preservation community feared that an above-grade roadway would harm the Vieux Carré's historic

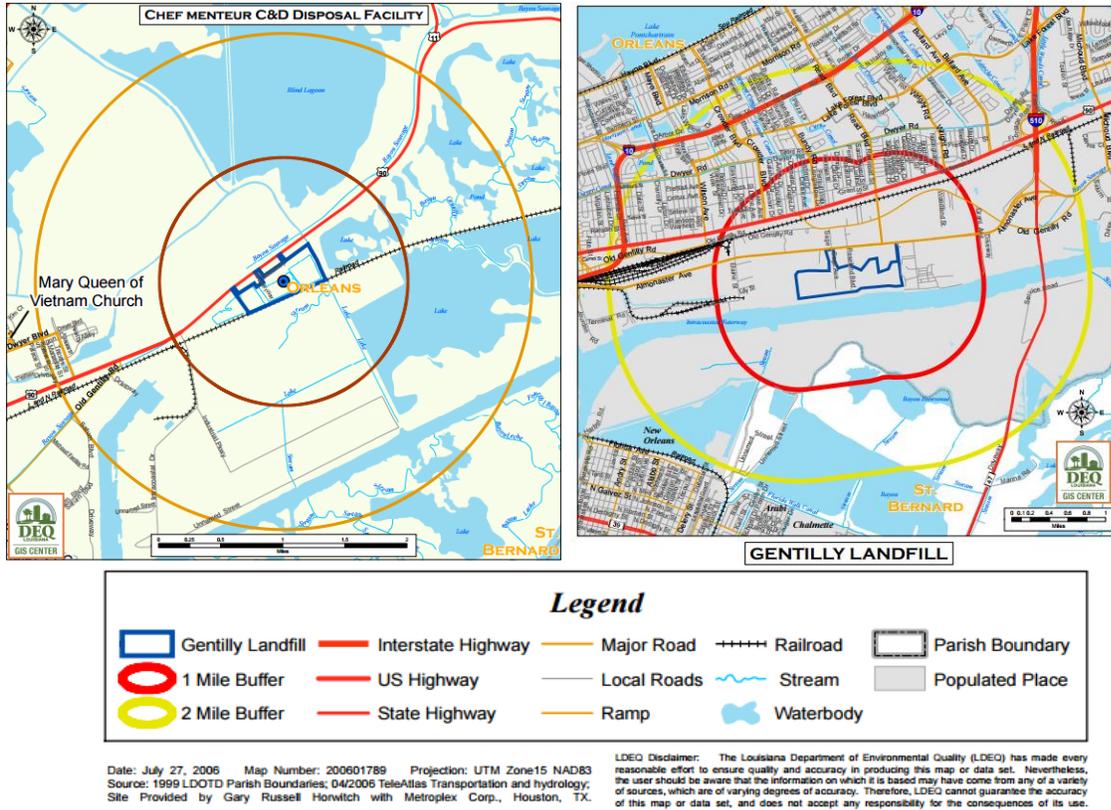
character and permanently sever its relationship to the river.  
<http://architecture.tulane.edu/preservation-project/timeline-entry/956>.

The proposed elevated expressway, however, was erected in the historically Black neighborhood of Tremé above Claiborne Avenue. This was the central business corridor of the Tremé neighborhood, a historic Black and Creole neighborhood with roots beginning in the 18th century. The construction of the expressway removed the character of the oak-lined corridor. In the following decade, registered businesses along Claiborne Avenue decreased by 50%. The Tremé neighborhood, once a center of jazz and African-American culture, began a steady decline. Cement parking lots replaced the public green space underneath the expressway. <https://reclaiminggoldwestbroad.org/case-studies/new-orleans-claiborne-expressway/>

**Unsafe and Unhealthy Homes:** According to the 2011 American Housing Survey, New Orleans has a particularly high rate of rental housing with environmental hazards. As much as 78% of the private rental housing stock needed major repairs in the past 12 months. Hazards in the home include mold (1,700 units), fire hazards (5,000+ units), and rodent and insect infestations (7,000+ units). Insect infestations have taken on a new level of concern as the Zika virus threatens the Gulf Coast and female-headed households with children are overrepresented in the rental market. African-Americans are also overrepresented in the rental market, and even more so in areas with little market activity where conditions are likely to be worse. Unsafe and unhealthy homes have been linked to higher asthma rates, missed school and work days, and higher healthcare costs. The City of New Orleans currently does not proactively accept code enforcement complaints about the interior of a home, but *Housing for Resilient New Orleans* calls for a Rental Registry to address this problem.

**Toxic Waste:** The below maps depict landfills in New Orleans that are in close proximity to neighborhoods. Not listed on this map is the old Silver City Dump, which was the site of Booker T. Washington High School and the B.W. Cooper public housing development. The B.W. Cooper development is being rebuilt as a mixed-income development—Marrero Commons—on the same site. A new school is also slated to open on the site. The Agriculture Street Dump, which has been mentioned often in public comments, is also missing from the map. The residents self-report a 92% cancer rate among the remaining homeowners.

<http://www.deq.louisiana.gov/portal/NEWS/HurricaneInformation/ChefMenteurandGentillyLandfill.aspx>



ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Table 12 shows few disparities in access to environmentally healthy neighborhoods by protected class groups for the total population of New Orleans, but local data mentioned above overwhelmingly shows communities of color bear the brunt of environmental toxins in New Orleans. A higher score on the HUD index indicates greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

- Native Americans at 25.37 have the least access to environmentally healthy neighborhoods.
- The Hispanic population also has low access to environmentally healthy neighborhoods at 26.89.
- Blacks have the third lowest access to environmentally healthy neighborhoods at 26.92
- Whites are fourth at 27.22 indicating greater access to environmentally healthy neighborhoods.
- Asians and Pacific Islanders have the greatest access to environmentally healthy neighborhoods with a score of 37.27.

## **f. Patterns in Disparities in Access to Opportunity**

- i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

In reviewing and analyzing data, it is clear that the Black population continues to have the most exposure to poverty, continues to have failing schools in their neighborhoods, and is among the top three groups that have the most exposure to environmental hazards placed in their communities. In addition, the black community ranks second to last in access to transportation behind the Asian population which has the least access to transportation.

## **2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

### **Access to Healthcare**

Large disparities in health exist between different groups of people in New Orleans. A report developed by the New Orleans Health Department in 2010 examined racial health disparities between African-Americans and Whites during the period of 2008-2010. The report found the following disparities:

- African-Americans in New Orleans were 1.37 times more likely to die than Whites in New Orleans over the period of 2008-2010. This ratio was higher in New Orleans over this period than in Louisiana and in the United States as a whole, which means that New Orleans has a more severe disparity in all-cause mortality between Whites and African-Americans than both the state and the nation.
- African-Americans were eight times more likely to die of homicide than Whites in Orleans Parish during this period.
- African-Americans were three times more likely to die of diabetes and twice as likely to die of kidney disease and HIV.
- African-American children under 18 in New Orleans are about three and a half times more likely to be uninsured than White children.
- African-Americans ages 18-64 were nearly twice as likely to be uninsured than White adults.

<http://www.nola.gov/nola/media/Health-Department/Publications/Health-Disparities-in-New-Orleans-Community-Health-Data-Profile-final.pdf>

There is a 25.5 year difference between the ZIP codes in New Orleans with the highest and lowest life expectancies. A 2012 study published by the Joint Center for Political and Economic Studies' Place Matters Project examined the impact of place on health in Orleans Parish. The Center collected ZIP code level data and calculated life expectancies for each area, finding a 25.5 year disparity between the ZIP codes with the highest and lowest life expectancies. ZIP code 70112, containing parts of the Tulane, Gravier, Iberville and Tremé neighborhoods, had a life expectancy of 54.5 years. This is lower than the Democratic

Republic of the Congo. ZIP code 70124, containing the Lakeshore, Lake Vista, Lakeview, West End, Lakewood, and Navarre neighborhoods, had a life expectancy of 80, similar to the UK and higher than the US average in 2012.

<http://jointcenter.org/docs/New%20Orleans%20CHERRReport.pdf>

### **Access to Financial Services**

Anecdotal information from community members indicates that the ability to secure loans for homes and businesses is one of the reasons that they are unable to locate in low poverty areas or have better transportation options. The City's 2010 Analysis of Impediments (AI) report found that from 2002-2007, there was an average loan denial rate of 22%. The most common reasons for denial were credit history and debt-to-income ratio. Whites had a denial rate of 13%, Hispanics a denial rate of 28%, and African-Americans a denial rate of 30%.

The disparity among races prevailed even when income was taken into account. The AI report states that "White applicants with incomes below \$15,000 were denied 25% of the time, while black applicants in the same income range were denied 55% of the time. For applicants with incomes above \$75,000, whites had a denial rate of 10% and blacks had a denial rate of 27%." In addition, the Kirwan Institute indicates in its 2010 report, "Credit and Lending in Communities of Color," that consumers of color disproportionately pay more for auto financing, credit cards, private student loans, payday lending, car title loans, and others forms of credit. <http://kirwaninstitute.osu.edu/my-product/credit-and-lending-in-communities-of-color/>.

Regarding national origin protected groups, a study on immigrant banking completed in 2015 by the Appleseed Foundation the found:

- Thirty-three percent of the banks and credit unions surveyed indicated that lack of bilingual personnel or having a language barrier was a problem. Uncertainty about government regulations, specifically the Patriot Act requirements and proof of identity, created obstacles for 50 percent of participants.
  - One institution listed determining the credit history of immigrants as a particular issue while two others recognized that many people in the Latino community distrust mainstream institutions.
  - A lack of locations in Latino-populated areas created barriers for three institutions. <http://appleseednetwork.org/wp-content/uploads/2015/10/LA-Appleseed-Immigrant-Banking-Report1.pdf>
- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

New Orleans has enacted policies aimed at providing more access to quality schools by ensuring that any child can attend any public school in the city, even if that school is not within the child's neighborhood. Although this policy on its face provides broader access, in practice, only the families that have the ability to transport children to schools outside of their neighborhoods to attend these schools or families that feel comfortable with children leaving home extremely early in the morning to travel to school on a bus and getting home late can take advantage of this citywide access policy.

Regarding healthcare, federal policies that provide broader access to health insurance may lessen health disparities; however, the Affordable Care Act has only been fully

implemented for a short period which means its effect on disparities is not yet readily apparent.

The City of New Orleans has also considered public transportation options that would provide more access to families with children and other protected classes in accessing low cost and quality transportation while reducing environmental hazards. The City considered removing the elevated I-10 expressway from the majority African-American neighborhood of Treme to (1) provide more bus access and bike lanes so families without cars could access low cost transportation; (2) reduce air and noise pollution from the elevated expressway; and (3) increase economic development activities on a once thriving African-American commercial corridor. This proposal has not been implemented due to opposition from a major industry, the Port of New Orleans, and opposition from the public due to fear that the removal would affect evacuation routes.

In addition, the City of New Orleans has created a NOLA for Life program to assist African-American males. This program focuses on assisting those with a criminal background have access to alternative activities, jobs, and community resources.

### **3. Contributing Factors of Disparities in Access to Opportunity**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.*

**Location of proficient schools and school assignment policies:** As a result of historic patterns of residential racial segregation, many African-American students live in zones with few high quality schools, while many white students live in zones with A or B rated schools. Seven of the highest ranked public schools in New Orleans do not participate in the citywide application system used by most public schools. The application and enrollment processes for these schools are demanding on parents' schedules and require access to transportation. These schools often expect parents to deliver parts of the application during school hours and also require parent meetings and student exams for entry. The majority of public schools lack LEP services and a number do not have sufficient special education services. When reviewing the HUD race/ethnicity map in conjunction with the maps showing the location of proficient schools, the maps show that the majority of Latino and Asian residents do not live near proficient schools.

**Access to proficient schools for persons with disabilities:** The chart in preceding pages demonstrate barriers to accessing proficient schools with most schools only partially accessible due to poor or missing sidewalks and curb ramps. In addition, according to the Southern Poverty Law Center, a disproportionate number of students who have cognitive disabilities are being suspended at high rates from integrated school settings.

**Lack of employment opportunities:** The City of New Orleans developed and conducted a survey to provide a detailed illustration of the assets and challenges of African-American males in gaining access to employment opportunities. The report found that education levels, criminal history, lack of transportation, housing, and family life were obstacles to employment.

**Access to financial services:** Anecdotal information from community members indicates that the ability to secure loans for homes and businesses is one of the reasons that they are unable to locate in low poverty areas or have better transportation options.

**The availability, type, frequency, and reliability of public transportation:** New Orleans residents have experienced a 55% decline in available transit service since Hurricane Katrina which lowers the accessibility to affordable transportation for families that may not have the means to own a personal vehicle. **Access to transportation for persons with disabilities:** In addition, most taxis do not have wheelchair accessible vehicles and the St. Charles Street car is not wheelchair accessible.

**Lack of regional cooperation:** This topic drew comments due to the lack of regional transportation. Participants cited the difficulty in traveling across the region on public transit to and from job centers: “Jobs that are close to home don’t pay that much,” was a comment made at the public hearing held on July 19, 2016, as part of the HUD Affirmatively Furthering Fair Housing (AFFH) process.

**Location of environmental health hazards:** A theme that has been identified in reviewing R/ECAP and segregated areas is that a majority of these areas have been adversely impacted by elevated expressways where residents are subjected to noise pollution, lack of greenspace, and pollutants from vehicle traffic. In addition, R/ECAP and segregated areas have been located near or on landfill and waste sites.

**Location of employers:** At the first public hearing, some residents highlighted challenges accessing jobs in New Orleans. In addition, many jobs in New Orleans are temporary and not sustainable. High quality jobs outside of New Orleans are difficult to access due to the lack of regional transportation.

**Lack of access to Healthcare:** Large disparities in health exist between different groups of people in New Orleans. A report developed by the New Orleans Health Department in 2010 examined racial health disparities between African Americans and whites during the period of 2008-2010. The report found the following disparities:

- African Americans in New Orleans were 1.37 times more likely to die than whites in New Orleans over the period of 2008-2010. This ratio was higher in New Orleans over this period than in Louisiana and the United States as a whole, which means that New Orleans has a more severe disparity in all-cause mortality between whites and African Americans than both the state and the nation.
- African Americans were eight times more likely to die of homicide than whites in Orleans Parish during this period.
- African Americans were three times more likely to die of diabetes and twice as likely to die of kidney disease and HIV.
- African American children under 18 in New Orleans are about three and a half times more likely to be uninsured than white children.

**Inaccessible government facilities or services:** The City of New Orleans and Jefferson Parish have both have entered into settlement agreements regarding inaccessible government facilities and services. Jefferson Parish entered into an agreement to ensure that polling places were accessible and the City of New Orleans had to modify government buildings to ensure that they were ADA accessible. When government facilities and services are not in

compliance with ADA rules, individuals with disabilities face barriers in accessing government services and participating in the civic process.

**Inaccessible sidewalks, pedestrian crossings, or other infrastructure:** Not until March 2016 did New Orleans install the first Accessible Pedestrian Signal (APA) located at McAlister crosswalks at the Tulane University campus. It is an audible beeping that helps visually impaired people know when it is safe to cross the road. This is the only APS in the City. In addition, the majority of schools have documented that sidewalks and curb ramps are poor or missing. Sidewalks in New Orleans remain in a state of disrepair. Cracks are present on the majority of sidewalks, making movement in a wheelchair uneven and bumpy. The roots of trees upend sidewalks, making the traverse quite difficult at times. Some sidewalks are not equipped with curb cuts, making them inaccessible to the independent wheeler.

**iv. Disproportionate Housing Needs**

**1. Analysis**

- a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Race/Ethnicity

According to Table below, the Black population experiences higher rates of housing cost burden, overcrowding, and substandard housing as compared to other groups. The Hispanic population also experiences higher rates of housing problems than other groups.

Disproportionate Housing Needs	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		
	# with problems	# households	% with problems
<b>Households experiencing any of 4 housing problems*</b>			
<b>Race/Ethnicity</b>			
Black, Non-Hispanic	42,965	80,175	53.59
Hispanic	3,185	6,725	47.36
Other, Non-Hispanic	835	1,769	47.20
Native American, Non-Hispanic	129	349	36.96
White, Non-Hispanic	18,685	51,315	36.41
Asian or Pacific Islander, Non-Hispanic	1,093	3,498	31.25
<i>Total</i>	<i>66,920</i>	<i>143,850</i>	<i>46.52</i>

According to Table 10, the African-American population experiences the highest incidence of severe housing cost burden with 31% of Black households experiencing severe housing cost burden.

Family Status

According to Table 9, family households with five or more people experience higher rates of housing cost burden, overcrowding, or substandard housing, followed closely by non-family households at 51%. Small families experience the lowest frequency of housing problems of any household type.

Disproportionate Housing Needs	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		
	# with problems	# households	% with problems
Households experiencing any of 4 housing problems*			
Family households, <5 people	26,870	66,915	40.16
Family households, 5+ people	5,840	10,150	57.54
Non-family households	34,205	66,780	51.22

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

From a review of Map 7, the following areas in the jurisdiction experience the greatest housing burdens:

- New Orleans East area between I-10 expressway and Morrison Road and bound by Read Boulevard. This area is a R/ECAP where the predominant race is African-American.
- The 7th ward area bound by N. Claiborne (I-10 expressway) and N. Galvez and Allen Street and Elysian Fields Avenue. This area is a R/ECAP where the predominant race is African-American.
- The 7th ward area bound by Esplanade Avenue and Elysian Fields and Law Street and St. Claude Avenue. This area is a R/ECAP where the predominant race is African-American.
- The Mid-City area bound by N. Claiborne (I-10 expressway) to N. Carrollton and Conti and Canal Street. This area is a R/ECAP where the predominant race is African-American.
- The area bound by Washington Avenue to Earhart expressway and Toledano and Joliet Street. This area is a R/ECAP where the predominant race is African-American.
- The area bound by N. Claiborne (I-10 expressway) and N. Broad Street and Esplanade Avenue to St. Philip Street. This area is not a R/ECAP, but the predominant race is African-American.

- The area bound by N. Claiborne Avenue and N. Peters and Charbonnet Street to St. Bernard Parish line. This area is not a R/ECAP, but the predominant race is African-American.
- The area bound by N. Claiborne (I-10 expressway) to Jefferson Davis Parkway and St. Louis Street to Banks Street. This area is a R/ECAP where the predominant race is African-American.
- The Central City area bound by O.C. Haley Blvd and Simon Bolivar Blvd and 1st Street and Toledano Street. This area is a R/ECAP where the predominant race is African-American.
- The Central City area bound by Simon Bolivar Blvd and S. Claiborne Avenue and 1st Street and Louisiana Avenue. This area is not a R/ECAP, but the predominant race is African-American.
- The area on the Westbank bound by US 90 expressway and Behrman Place and General DeGaulle Drive and Jefferson/Orleans Parish line. This area is not a R/ECAP, but the predominant race is African-American.

In the region, the primary areas with the greatest housing burden outside of the City of New Orleans are as follows:

- The area on the Westbank bound by Westbank expressway and 5th Street and Orleans/Jefferson Parish line and Stumpf Boulevard. This area is not R/ECAP area, but the predominant race is African-American.
  - The Bayou Segnette and Jean Lafitte areas also have high housing burdens.
- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

According to Table 9, approximately 58% of Orleans Parish households with five or more people experience severe housing problems. Approximately 24% of these households experience severe housing cost burdens.

- d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

According to a study commissioned by the New Orleans Redevelopment Authority and published in March 2016 entitled “Where will People Live: New Orleans Growing Housing Challenge” and prepared by the Center for Community Progress (<http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf>), 55% or 86,000 of all New Orleans households were renters in 2013. Renters comprised 58% of African-American households, compared to 49% of white households. In addition, according to HUD’s Comprehensive Assessment Survey (CHAS), in 2015, Orleans Parish had 143,850 households and, of these households, 48% or 68,505 were owner occupied. Renter households in 2015 comprised around 52% or 75,345 households.

## **2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

The following information is data provided by the March 2016 report “Where will People Live: New Orleans Growing Housing Challenge” and prepared by the Center for Community Progress (<http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf>):

**Family Status**

According to the March 2016 report, 60% of all renter households in New Orleans are non-family households, while 49% are single individuals, compared to 47% and 36% of renter households respectively nationwide. One-third of renter households nationally have children under 18 in the home, compared to roughly one-fifth of New Orleans renter households. The table below shows a strong trend in New Orleans’ rental market away from both married couples and female-headed families toward single individuals and other non-family households.

**Table – Renter Households by Type and Presence of Own Children 2000 and 2013**

	2000		2013		CHANGE 2000-2013
	number	% of all renters	number	% of all renters	
Married Couples	17,116	17.0%	11,265	13.0%	- 34.2%
with own children <18	8,419	8.4	4,113	4.8	- 51.1
Female-Head Family	30,055	29.8	19,714	22.8	- 34.4
with own children <18	20,464	20.3	11,672	13.5	- 43.0
Other Family	4,652	4.6	3,789	4.5	- 18.6
Non-Family Household	48,893	48.5	51,585	59.7	+ 5.6
Single individual	40,198	39.9	42,046	48.7	+ 4.6
Other non-family household	8,695	8.6	9,539	11.0	+ 9.7
TOTAL	100,716	100%	86,353	100%	- 14.3%

SOURCE: 2000 Census; 1 year 2013 AmericanCommunity Survey

**Age of Renters and Homeowners**

Thirty-six percent of New Orleans’ renter heads of household are under age 35, compared to 11% of homeowners under age 35. 28% of homeowners are 65 or older, compared to 11% of renters.

**Socioeconomic Status of Renters and Homeowners**

In New Orleans the median income of tenants is only 42% of the median for homeowners, compared to 48% nationally. Householders earning under \$20,000 are disproportionately likely to be renters while households earning over \$50,000 are disproportionately likely to be homeowners. 43% of all renters have annual total household incomes of less than \$20,000. The table below depicts the disparities.

**Table – Income Distribution of Households**

	OWNERS	RENTERS	TOTAL	INCOME DISTRIBUTION		% HOUSEHOLDS THAT ARE RENTERS
				Owners	Renters	
0 to \$9,999	4,848	17,946	22,794	6.9%	22.9%	78.7%
\$10,000 to \$19,999	7,020	15,719	22,739	10.0%	20.1%	69.1%
\$20,000 to \$34,999	9,799	15,819	25,618	14.0%	20.2%	61.7%
\$35,000 to \$49,999	9,044	9,827	18,871	12.9%	12.6%	52.1%
\$50,000 to \$74,999	12,340	9,298	21,638	17.6%	11.9%	43.0%
\$75,000 to \$99,999	8,496	4,306	12,802	12.1%	5.5%	33.6%
\$100,000 or more	18,628	5,308	23,936	26.5%	6.8%	22.2%
<b>TOTAL</b>	<b>70,175</b>	<b>78,223</b>	<b>148,398</b>	<b>100%</b>	<b>100%</b>	
<b>MEDIAN</b>	<b>\$57,408</b>	<b>\$24,339</b>	<b>\$37,146</b>			

SOURCE: Five-year 2009-2013 American Community Survey

- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.

Please see the Housing Needs Analysis table from the Housing Authority of New Orleans PHA Plan for fiscal year beginning October 1, 2016 on the following pages. This table analyzes the needs of low-income renter households using HUD’s 2015 CHAS Survey.

**HOUSING AUTHORITY OF NEW ORLEANS**  
**HOUSING NEEDS STATEMENT: PHA ANNUAL PLAN FYB OCTOBER 1, 2016**

**HUD 2015 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS)**  
**USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2008-2012 DATASETS**

<b>Total Orleans Parish Households</b>	<b>143,850</b>																			
<b>Owner Households</b>	<b>68,505 (48% of Total)</b>																			
<b>Renter Households</b>	<b>75,345 (52% of Total)</b>																			
<b>Orleans Parish Renter Households by Average Median Income (AMI)</b> <b>With Breakout of "Low Income Renter" Households</b>		<b>Statistical Notations</b>																		
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Extremely Low Income renter households (&lt;=30% AMI)</td> <td style="text-align: right;">23,510</td> <td rowspan="7" style="vertical-align: middle; padding-left: 20px;">Of the total 75,345 Renter Households in Orleans Parish, 49,500 or 66% are classified as "Low Income" Renter Households</td> </tr> <tr> <td>Very Low Income renter households (&gt;30% but &lt;=50% AMI)</td> <td style="text-align: right;">12,930</td> </tr> <tr> <td>Low Income renter households (&gt;50% but &lt;=80% AMI)</td> <td style="text-align: right;"><u>13,055</u></td> </tr> <tr> <td style="padding-left: 20px;"><b>Subtotal "Low Income Renter" Households (&lt;=80% AMI)</b></td> <td style="text-align: right;"><b>49,500</b></td> </tr> <tr> <td>Other renter households (&gt;80% but &lt;=100% AMI)</td> <td style="text-align: right;">5,635</td> </tr> <tr> <td>Other renter households (&gt;100% AMI)</td> <td style="text-align: right;"><u>20,215</u></td> </tr> <tr> <td style="padding-left: 20px;"><b>Subtotal Other Renter Households (&gt;80% AMI)</b></td> <td style="text-align: right;"><b>25,850</b></td> </tr> <tr> <td style="padding-left: 20px;"><b>Total Renter Households:</b></td> <td style="text-align: right;"><b>75,345</b></td> <td></td> </tr> </table>	Extremely Low Income renter households (<=30% AMI)	23,510	Of the total 75,345 Renter Households in Orleans Parish, 49,500 or 66% are classified as "Low Income" Renter Households	Very Low Income renter households (>30% but <=50% AMI)	12,930	Low Income renter households (>50% but <=80% AMI)	<u>13,055</u>	<b>Subtotal "Low Income Renter" Households (&lt;=80% AMI)</b>	<b>49,500</b>	Other renter households (>80% but <=100% AMI)	5,635	Other renter households (>100% AMI)	<u>20,215</u>	<b>Subtotal Other Renter Households (&gt;80% AMI)</b>	<b>25,850</b>	<b>Total Renter Households:</b>	<b>75,345</b>		<b>49,500</b>	
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<b>Total Renter Households:</b>	<b>75,345</b>																			
Low income renter households with moderate to severe housing <b>cost burden</b> (of total 49,500)	<b>37,130</b>	Of all 49,500 "Low income" Renter Households, 37,130 or 75% are Cost Burdened (24% Moderate and 51% Severe)																		
Low income renter households with <b>housing problems</b> (of total 49,500)	<b>38,025</b>	Of all 49,500 "Low income" Renter Households, 38,025 or 77% have Housing Problems																		

<i>Low Income "Elderly Renter" Households</i>		<i>Statistical Notations</i>
Low income elderly renter households with at least one member 62 years and older (of total 49,500)	<b>8,140</b>	Of all 49,500 "Low income" Renter Households, 8,140 or 16% are Elderly Households with at least one member 62 years and older
Low income elderly renter households with <b>housing problems</b> (of total 8,140)	<b>5,780</b>	Of all 8,140 "Low income Elderly" Renter Households, 5,780 or 71% have Housing Problems
<i>Low Income "Disabled Renter" Households</i>		<i>Statistical Notations</i>
Low income disabled renter households experiencing <b>housing problems</b> where at least one household member has a <b>hearing or vision impairment</b> (of total 5,615)	<b>4,150</b>	Of all 5,615 "Low income Disabled" Renter Households with Hearing or Vision Impairments 4,150 or 74% have Housing Problems
Low income disabled renter households experiencing <b>housing problems</b> where at least one household member has an <b>ambulatory limitation</b> (of total 8,175)	<b>6,195</b>	Of all 8,175 "Low income Disabled" Renter Households with Ambulatory Limitations 6,195 or 76% have Housing Problems
Low income disabled renter households experiencing <b>housing problems</b> where at least one household member has a <b>cognitive limitation</b> (of total 6,470)	<b>4,720</b>	Of all 6,470 "Low income Disabled" Renter Households with Cognitive Limitations 4,720 or 73% have Housing Problems
Low income disabled renter households experiencing <b>housing problems</b> where at least one household member has a <b>self-care or independent living limitation</b> (of total 5,670)	<b>4,295</b>	Of all 5,670 "Low income Disabled" Renter Households with Self-Care or Independent Living Limitations 4,295 or 76% have Housing Problems
<i>Low Income Renter Households by "Race/Ethnicity"</i>		<i>Statistical Notations</i>
<b>White</b> Low income renter households experiencing <b>housing problems</b> (of total 9,970)	<b>7,795</b>	Of the total 9,970 White Low income renter households 7,795 or 78% have housing problems
<b>Black</b> Low income renter households experiencing <b>housing problems</b> (of total 35,555)	<b>27,300</b>	Of the total 35,555 Black Low income renter households 27,300 or 77% have housing problems
<b>Asian</b> Low income renter households experiencing <b>housing problems</b> (of total 914)	<b>614</b>	Of the total 914 Asian Low income renter households 614 or 67% have housing problems
<b>Hispanic</b> Low income renter households experiencing <b>housing problems</b> (of total 2,360)	<b>1,850</b>	Of the total 2,360 Hispanic Low income renter households 1,850 or 78% have housing problems
<b>Other</b> Low income renter households experiencing <b>housing problems</b> : includes American Indians, Pacific Islanders, & Multi-Racial Households (of total 695)	<b>460</b>	Of the total 9,970 Other Low income renter households 7,795 or 78% have housing problems
<p><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".</p> <p><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.</p>		

### 3. Contributing Factors of Disproportionate Housing Needs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

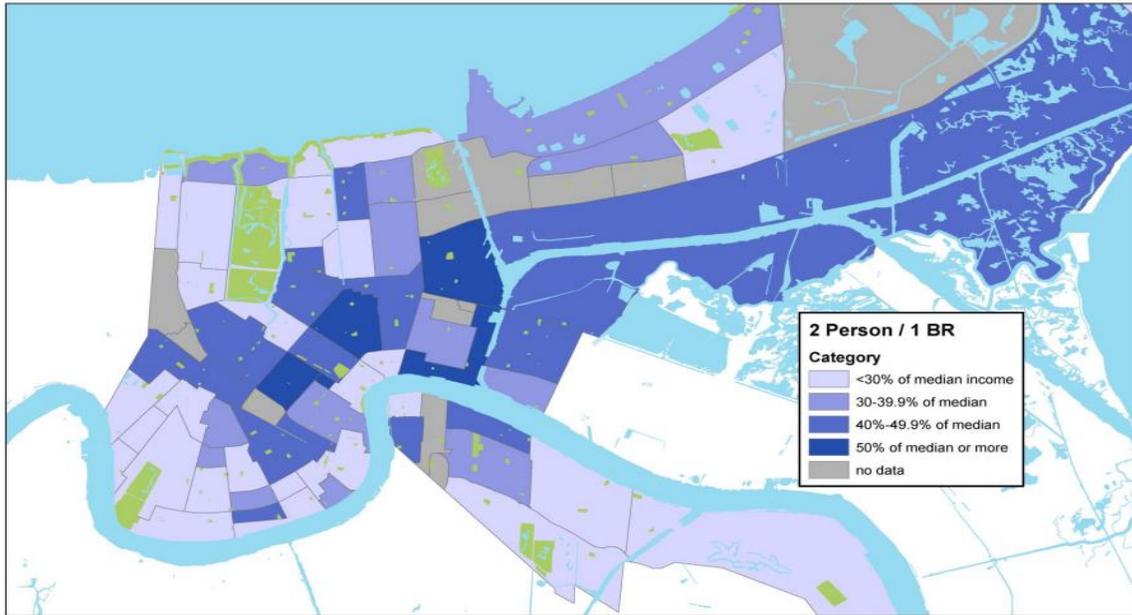
#### **The availability of affordable units in a range of sizes**

The below maps taken from “Where will People Live: New Orleans Growing Housing Challenge” provide a snapshot of the growing problem of the lack of affordable housing in New Orleans and how it contributes to disproportionate housing needs. The maps show that residents are paying 50% or more of median income for housing in many parts of the city.

**Map – Affordable of Housing for 1 Person/1 Bedroom**

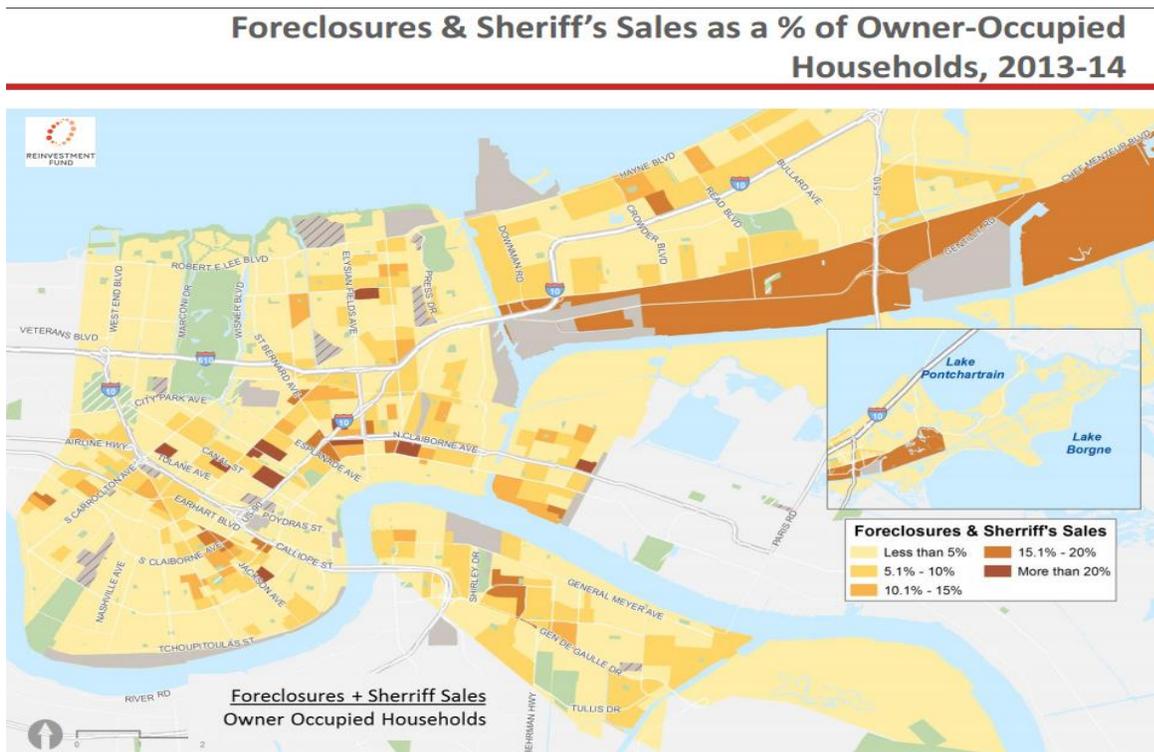


**Map – Affordable of Housing for 2 Person/1 Bedroom**

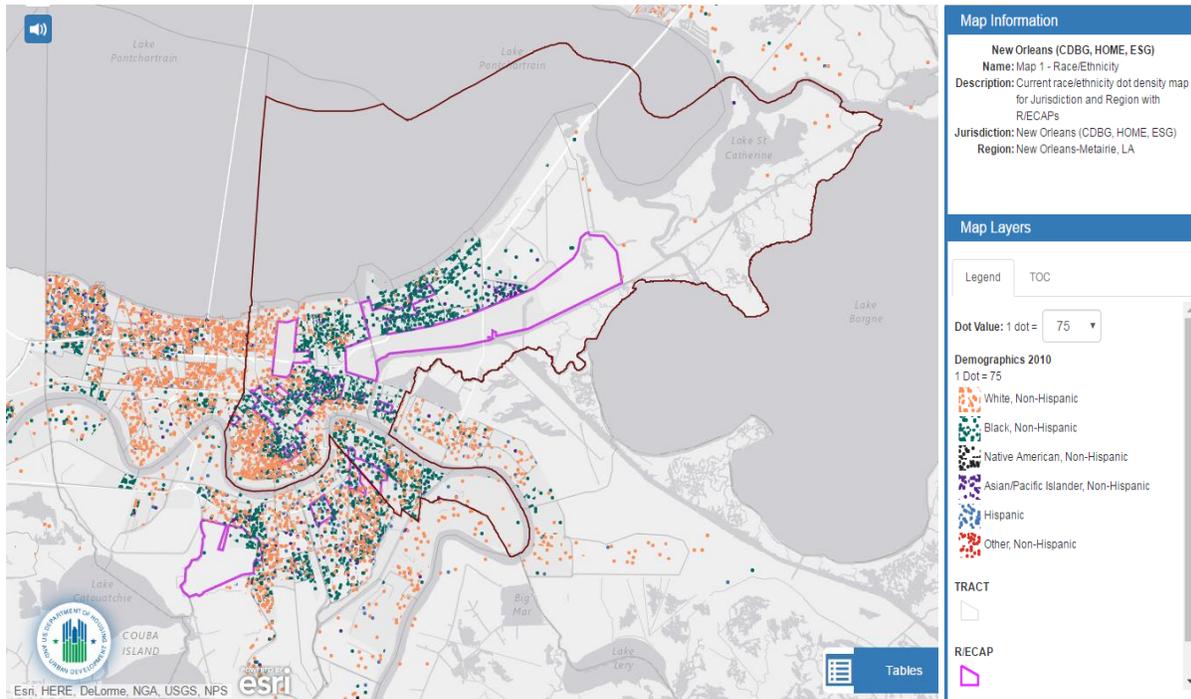


**Displacement of residents due to economic pressures**

The map below from The Reinvestment Fund’s March 2016 report “Market Value Analysis – New Orleans” details the percentage of owner-occupied homes that are in foreclosure in New Orleans. The map shows a correlation between neighborhoods with high foreclosures and R/ECAP areas.



**MAP 1 – Race/Ethnicity and Concentrated Areas of Poverty 2010**



**C. Publicly Supported Housing Analysis**

**1. Analysis:**

**a. Publicly Supported Housing Demographics**

- i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

With respect to race and ethnicity, African-Americans are the predominant group residing in publicly supported housing in New Orleans. This is the case across three of the four reported housing categories – public housing, HCVP, and Project-Based Section 8. Although the Other Multifamily category is significantly smaller than the other three housing types, it exhibits a more diverse distribution with Whites at 35.79%, African-Americans at 26.11%, Asians or Pacific Islanders at 19.37%, and Hispanics at 15.37%.

Table 6 provides demographic information on residents living in publicly supported housing in New Orleans. The demographics are presented by race and ethnicity and categorized into four housing types. Public housing and the HCVP are administered by HANO. Project Based Section 8 and Other Multifamily Housing Programs are administered by HUD.

HUD Table 6 Excerpt - Publicly Supported Housing Residents by Race/Ethnicity								
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	16	1.09	1,409	96.37	35	2.39	1	0.07
Project-Based Section 8*	1,160	28.58	2,280	56.17	420	10.35	184	4.53
Other Multifamily	170	35.79	124	26.11	73	15.37	92	19.37
HCV Program	241	1.30	17,603	95.24	584	3.16	30	0.16
Note: Project Based Section 8 and Other Multifamily Housing administered by the U.S. Department of Housing and Urban Development (HUD).								

Data excerpted from Table 6 shows that 1,409 Black households (96.37%) residing in New Orleans public housing – representing the highest racial/ethnic group. With respect to other racial/ethnic groups, there are 35 Hispanic households (2.39%), 16 (1.09%) White households, and only one (.07%) Asian or Pacific Islander household living in New Orleans public housing.

Public housing demographics in New Orleans closely resemble the racial/ethnic composition of residents assisted by HCVP. According to Table 6, there are 17,603 (95.24%) Black households participating in HCVP, which is clearly the largest racial/ethnic group assisted under the program. Hispanics are ranked second, accounting for 584 (3.16%) households. Whites are ranked third, accounting for 241 (1.30%) households, and Asians or Pacific Islanders are the smallest group of only 30 (0.16%) households. Black households are overwhelmingly the largest racial/ethnic group residing in the New Orleans Public Housing and HCVP-supported housing at 96.37% and 95.24% respectively.

It should be noted the HUD statistical data related to the "HCV Program" includes both tenant-based and project-based vouchers administered by HANO, while units identified in the "Project-Based Section 8" category are administered directly by HUD.

Additionally, many of the units captured in the "Other Multifamily" category include developments that have received HUD loans or other subsidies, but have zero affordable units. This is the case with a number of large luxury apartment buildings listed on the HUD map, including the Saratoga, 903 Poydras, and the Rice Mill Lofts.

Table 6 also shows that Black households represent the majority of families living in Project-Based Section 8 developments with 2,280 (56.17%) households reported in the dataset. White households ranked as the second largest group with 1,160 (28.58%) households, Hispanics ranked third with 420 households (10.35%), and Asians or Pacific Islanders ranked last with 184 families (4.53%).

HUD's Other Multifamily developments represent a small component of the New Orleans publicly supported housing market. In terms of resident demographics, Table 6 shows that Whites ranked highest at 170 (35.79%) assisted households, followed by

Blacks at 124 (26.11%), Asians or Pacific Islanders at 92 (19.37%); and 73 (15.37%) Hispanics living in HUD’s Other Multifamily housing developments.

- ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Table 6 provides data on the number of households that meet income eligibility requirements for publicly supported housing. The data is sorted by race and ethnicity and categorized by Area Median Income (AMI) groupings of 0-30% AMI, 0-50% AMI, and 0-80% AMI. As indicated earlier, the Public Housing and Housing Choice Voucher (HCV) Programs are administered by HANO, and Project-Based Section 8 and Other Multifamily Housing are administered by HUD. Eligibility for all of these programs is generally limited to families with household income up to 80% AMI.

<b>Table 6 Excerpt – Publicly Supported Housing Residents by Race/Ethnicity</b>									
<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>	<b>Race/Ethnicity</b>								
	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
<b>Income Eligible Households 0-80% of AMI</b>	<b>14,335</b>	<b>19.83%</b>	<b>51,355</b>	<b>71.05%</b>	<b>3,175</b>	<b>4.39%</b>	<b>1,594</b>	<b>2.21%</b>	<b>70,459</b>
<b>Housing Type / Assisted Households</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
Public Housing	16	0.11%	1,409	2.74%	35	1.10%	1	0.06%	
Project-Based Section 8	1,160	8.09%	2,280	4.44%	420	13.23%	184	11.54%	
Other Multifamily	170	1.19%	124	0.24%	73	2.30%	92	5.77%	
HCV Program	241	1.68%	17,603	34.28%	584	18.39%	30	1.88%	
<b>Total Households Living in Publicly Supported Housing by Racial/Ethnic Protected Class Category</b>	<b>1,587</b>	<b>11.07%</b>	<b>21,416</b>	<b>41.70%</b>	<b>1,112</b>	<b>35.02%</b>	<b>307</b>	<b>19.26%</b>	<b>24,423</b>

Data in the above chart highlights the fact that 70,459 New Orleans households are income-eligible for publicly supported housing. The chart also illustrates that 24,423 (34%) of New Orleans income eligible-households reside in publicly supported housing – with 2.07% residing in Public Housing; 5.74% residing in Project-Based Section 8 developments; .65% living in Other Multifamily Housing; and 26.20% using vouchers.

With regard to race and ethnicity, of the 70,459 total households that meet income-eligibility for publicly supported housing, 51,355 (71.05%) are Black 14,335 (19.83%) are White, 3,175 (4.39%) are Hispanic, and 1,594 (2.21%) are Asian or Pacific Islander. 21,416 (41.7%) of the 51,355 income-eligible Black households live in publicly supported housing as compared to 1,587 (11.07%) of the 14,335 income-eligible Whites, 1,112 (35.02%) of income-eligible Hispanics, and 307 (19.26%) of income-eligible Asian or Pacific Islanders. Thus, income-eligible Blacks have the highest degree of residency in

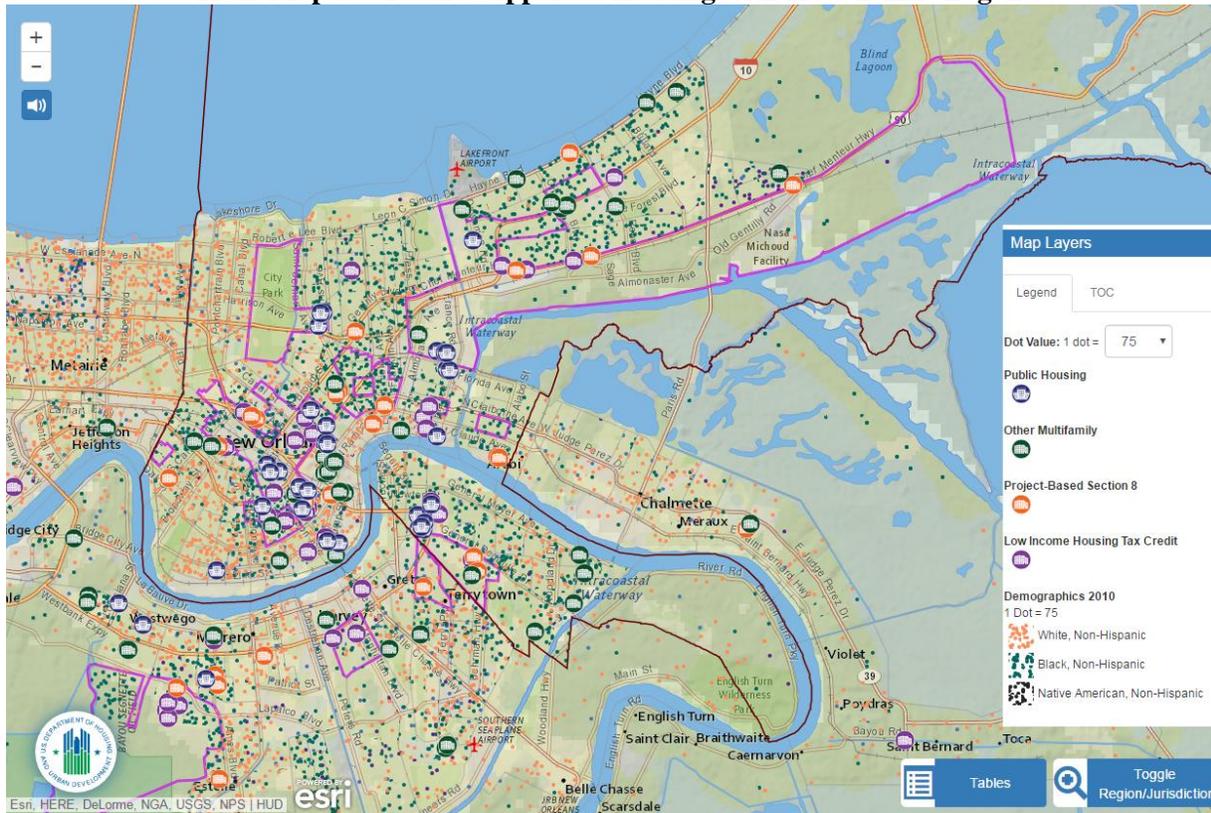
publicly supported housing, followed by income-eligible Hispanics, Asians or Pacific Islanders, and Whites.

**b. Publicly Supported Housing Location and Occupancy**

- i.** Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

Map 5 depicts the location of publicly supported housing in New Orleans. The overlay in Map 5 shows that publicly supported housing types are largely located in segregated, predominantly African-American neighborhoods. The data also shows that these publicly supported housing types are frequently located either within or in close proximity to R/ECAPs. At the same time, Map 5 shows minimal overlay of publicly supported housing in predominantly White segregated communities.

**HUD Map 5 – Public Supported Housing with Race/Ethnic Legend**



Map 6 depicts Housing Choice Vouchers with race and ethnicity dot density and R/ECAP overlays. Consistent with Map 5, the overlay shows that areas with higher percentages of HCVP-assisted housing are segregated African-American portions of the city. Map 6 also shows that areas with lower percentages of voucher units are generally occupied by higher concentrations of White households.

## HUD Map 6 – HCV Housing with Race/Ethnic Legend

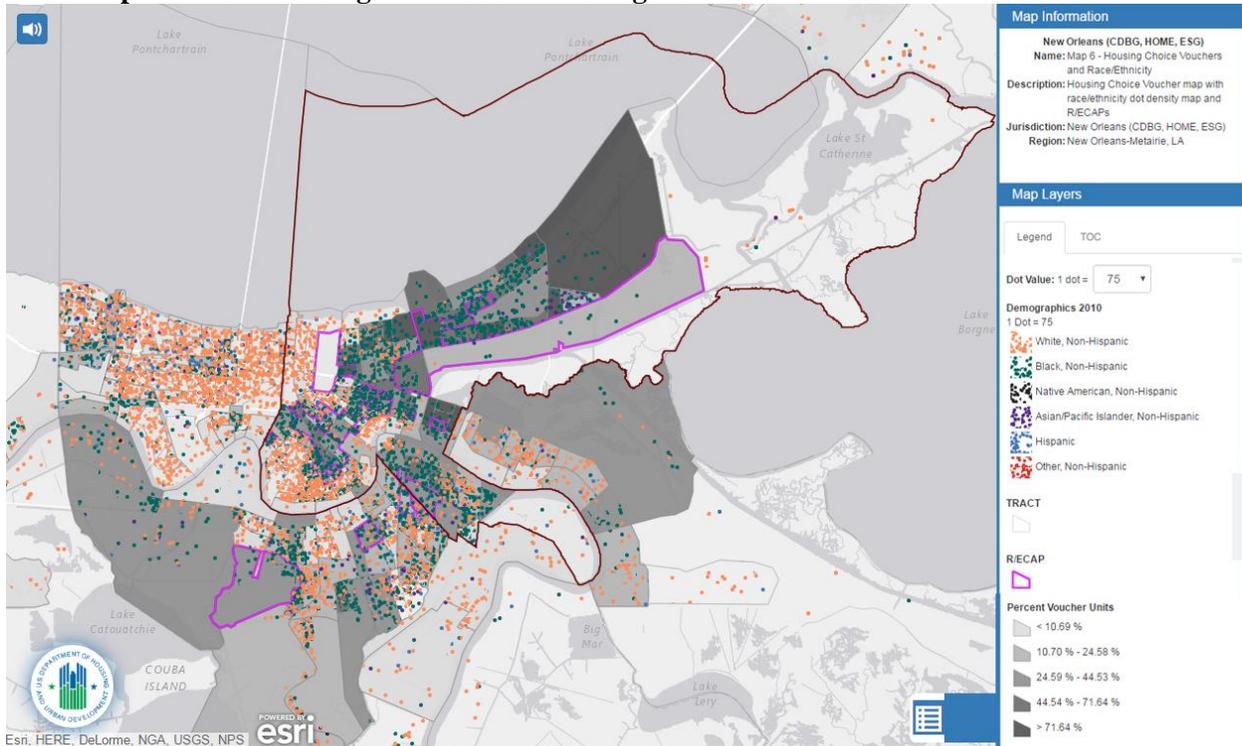


Table 7 allows for a comparison between R/ECAP and Non-R/ECAP units within four publicly supported housing categories. The findings of this analysis are provided in the table below for each of the four housing categories.

Table 7 Excerpt - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category		
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% R/ECAP & NON-RECAP
<b>Public Housing</b>		
R/ECAP tracts	1,427	84.74%
Non R/ECAP tracts	<u>257</u>	15.26%
	1,684	
<b>Project-based Section 8</b>		
R/ECAP tracts	1,816	43.90%
Non R/ECAP tracts	<u>2,321</u>	56.10%
	4,137	
<b>Other HUD Multifamily</b>		
R/ECAP tracts	181	36.49%
Non R/ECAP tracts	<u>315</u>	63.51%
	496	
<b>HCV Program</b>		
R/ECAP tracts	6,192	33.31%
Non R/ECAP tracts	<u>12,399</u>	66.69%
	18,591	

Although Maps 5 and 6 show that publicly supported housing is located throughout the City's R/ECAPs, Table 7 provides additional information about the extent to which the various types of publicly supported housing are found in Non- R/ECAP areas. Public housing comprises the greatest percentage of units located in R/ECAPs (84.74%) while the HCVP has the lowest percentage of assisted units in R/ECAPs

(33.31%). Less than 50% of the Project-Based Section 8 and Other HUD Multifamily units are located in R/ECAPs.

- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

Table 7 shows that 10,704 families with children reside in publicly supported housing and these families are primarily assisted under the HCV Program (9,612 households) and the Public Housing Program (701 households). There are 6,203 elderly households residing in New Orleans publicly supported housing with the majority of these elderly households living in Project-Based Section 8 (2,870) and in HCVP-assisted housing (2,336). With respect to disability, Table 7 reflects 5,491 households where at least one member has a disability, and the vast majority of those households (3,898) reside in HCVP-assisted housing.

<b>Table 7 Excerpt – Demographics on Elderly, Disabled, and Families with Children by Publicly Supported Housing Program Category</b>							
<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>	<b>Total # units (occupied)</b>	<b>% Elderly</b>	<b># Elderly</b>	<b>% with a disability*</b>	<b># with a disability*</b>	<b>% Families with children</b>	<b># Families with children</b>
<b>Public Housing</b>	1,684	31.83%	536	36.69%	618	41.64%	701
<b>Project-based Section 8*</b>	4,137	69.38%	2,870	22.03%	911	9.46%	391
<b>Other HUD Multifamily</b>	496	92.91%	461	12.75%	63	0.00%	0
<b>HCV Program</b>	18,591	12.56%	2,336	20.97%	3,898	51.70%	9,612
<b>Total Households Living in Publicly Supported Housing by Protected Class Category</b>	<b>24,908</b>	<b>24.90%</b>	<b>6,203</b>	<b>22.04%</b>	<b>5,491</b>	<b>42.98%</b>	<b>10,704</b>
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household. Note 2: Data Sources: APSH Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ). Note 4: Project Based Section 8 and Other Multifamily Housing administered by the U.S. Department of Housing and Urban Development (HUD).							

- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

The demographic composition of occupants of publicly supported housing living in R/ECAPs compared to the demographic composition of occupants of publicly supported housing living outside of R/ECAPs is as follows:

In public housing, 97.01% of households in R/ECAPs are Black as opposed to 93.39% of public housing households outside of R/ECAPs. 36.45% of public housing heads of household in R/ECAPs are elderly as opposed to 6.18% outside of R/ECAPs. 40.87% of households in R/ECAPs include a person with a disability as opposed to 13.51% outside of R/ECAPs. Approximately 1.33% of households in R/ECAPs are White households compared to 0% outside of R/ECAPs. Also, according to Table 7, 1.49% of households in R/ECAPs are Hispanic compared to 6.61% outside of R/ECAPs. 0.08% of households in R/ECAPs are Asian or Pacific Islander while no public housing households outside of R/ECAPs are Asian or Pacific Islander.

In Project-Based Section 8, 75.48% of households in R/ECAPs are elderly as opposed to 64.61% outside of R/ECAPs. 28.07% of households in R/ECAPs include a person with a disability compared to 17.30% outside of R/ECAPs. Blacks are almost evenly split, comprising 57.72% of Project-Based Section 8 households in R/ECAPs and 54.92% of such households outside of R/ECAPs. 30.75% of households in R/ECAPs are White, which is similar to the 26.81% of households outside of R/ECAPs that are White. 4.17% of households in R/ECAPs are Hispanic as compared to 15.37% of households outside of R/ECAPs.

According to Table 7, there are minimal differences in the occupancy of Other HUD Multi-Family Units within and outside of R/ECAPs. 92.22% of households in R/ECAPs are elderly as opposed to 93.31% outside of R/ECAPs. 12.22% of households in R/ECAPs include a person with a disability as opposed to 13.06% outside of R/ECAPs. 20.59% of households in R/ECAPs are White as opposed to 44.26% of households outside of R/ECAPs, which is the largest disparity of any group. 22.94% of households in R/ECAPs are Black as opposed to 27.87% of households outside of R/ECAPs. R/ECAP occupancy for Hispanics and Asian or Pacific Islanders residing in Other Multi-Family is unreported; however, 9.84% of households outside of R/ECAPs are Hispanic, and 12.29% of such households are Asian or Pacific Islander.

According to Table 7, there were small disparities between occupancy within and outside of R/ECAPs in the HCVP for all demographic groups.

Data used in this analysis is presented in two charts. Part A, which is derived from Table 7, reflects the *percentage of households* in each category of publicly supported housing within and outside of R/ECAPs. The data in Part A was recalculated to reflect the actual number of households in each of the respective categories. That data, presented in Part B, further quantifies and helps to illuminate several key comparisons of households occupying publicly supported housing in New Orleans. For example:

- The greatest number of White households live in Project-Based Section 8 housing, with 558 residing in R/ECAPs and 622 residing outside of R/ECAPs.
- Project-Based Section 8 is also largely occupied by elderly households with 1,371 households living in R/ECAPs and 1,500 households living outside of R/ECAPs.
- The number of all HCV households living in R/ECAPs is 5,926 as compared to 11,778 HCV households outside of R/ECAPs.
- Families with children with vouchers comprise 2,961 households in R/ECAPs and 6,651 households outside of R/ECAPs.

Table 7 Excerpt: **PART A - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category**  
(Reflects "Percentage" of Households)

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
<b>Public Housing</b>								
R/ECAP tracts	1,427	36.45	40.87	1.33	97.01	1.49	0.08	36.69
Non R/ECAP tracts	257	6.18	13.51	0.00	93.39	6.61	0.00	69.11
<b>Project-based Section 8</b>								
R/ECAP tracts	1,816	75.48	28.07	30.75	57.72	4.17		0.00
Non R/ECAP tracts	2,321	64.61	17.30	26.81	54.92	15.37	2.82	16.86
<b>Other HUD Multifamily</b>								
R/ECAP tracts	181	92.22	12.22	20.59	22.94			0.00
Non R/ECAP tracts	315	93.31	13.06	44.26	27.87	9.84	12.79	0.00
<b>HCV Program</b>								
R/ECAP tracts	6,192	14.53	23.01	1.25	95.70	2.87	0.05	47.82
Non R/ECAP tracts	12,399	11.58	19.95	1.37	94.99	3.28	0.22	53.64

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	# Elderly	# with a disability*	# White	# Black	# Hispanic	# Asian or Pacific Islander	# Families with children
<b>Public Housing</b>								
R/ECAP tracts	1,427	520	583	19	1384	21	1	524
Non R/ECAP tracts	257	16	35	0	240	17	0	178
<b>Project-based Section 8</b>								
R/ECAP tracts	1,816	1371	510	558	1048	76	0	0
Non R/ECAP tracts	2,321	1500	402	622	1275	357	65	391
<b>Other HUD Multifamily</b>								
R/ECAP tracts	181	167	22	37	42	0	0	0
Non R/ECAP tracts	315	294	41	139	88	31	40	0
<b>HCV Program</b>								
R/ECAP tracts	6,192	900	1425	77	5926	178	3	2961
Non R/ECAP tracts	12,399	1436	2474	170	11778	407	27	6651

- iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

Table 8 provides demographics of Publicly Supported Housing Developments by program category. Data on public housing developments consistently reports that Black households comprise between 94%-100% of all households with all other racial/ethnic household occupancy rates ranging between 0% and 6%. One exception is the River Garden Phase II Public Housing Development which is 86% Black and 14% Hispanic. With the exception of HANO's elderly designated developments, the percentage of households with children in public housing developments generally ranges between 45% and 80%. At 87%, the Westbank Scattered Sites have the greatest percentage of families with children.

Project-based Section 8 developments are primarily resided in by African-American households with occupancy percentages ranging from 77% to 96%, followed by White households ranging from 2% to 21% of occupants. Exceptions include the Mater Dolorosa development whose households are 43% Black, 49% White, and 8% Hispanic and Christopher Inn, which is 47% Black, 50% White, 3% Hispanic, and 1% Asian. In most Project-Based Section 8 developments in New Orleans, over 92% of households are elderly; however, families with children reside in the Tivoli Place Apartments (3%) and in Satchmo Plaza (4%).

HUD-provided demographic data is unavailable for Low Income Housing Tax Credit (LIHTC) developments. However, due to the mixed-finance model used in redeveloping the majority of New Orleans’ public housing developments, there are significant numbers of LIHTC units embedded within the HANO public housing portfolio. The table below provides details on the number of LIHTC units embedded within the HANO public housing portfolio.

HANO COMMUNITIES	PUBLIC HOUSING UNITS (51%)		OTHER AFFORDABLE UNITS (25%)			MARKET RATE UNITS (24%)	ALL UNITS (100%)
	ACC	ACC/LIHTC	LIHTC	PBV/LIHTC	PBV	MKT	TOTAL
<b>UNIT COUNTS</b>	<b>671</b>	<b>1335</b>	<b>729</b>	<b>209</b>	<b>83</b>	<b>954</b>	<b>3981</b>
<b>PERCENT OF TOTAL</b>	<b>17%</b>	<b>34%</b>	<b>18%</b>	<b>5%</b>	<b>2%</b>	<b>24%</b>	<b>100%</b>

**Unit Type Legend:**

**ACC = Annual Contributions Contract ("Public Housing")**

**LIHTC = Low Income Housing Tax Credit**

**MKT = Market Rate**

**PBV = Project Based Voucher**

Table 5 provides a “point-in-time” count of 1,684 public housing units and that “point-in-time” snapshot has been used in this AFH Plan in order to maintain a consistent “apples to apples” methodology in evaluating issues relating to the various categories of publicly supported housing. HANO’s current public housing inventory is comprised of 2,006 units. 1,333 (66%) of those units are LIHTC-assisted. Thus, to that extent, the demographics of LIHTC households living in HANO’s public housing communities are reflected in this demographic analysis.

**(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.**

Affordable housing is subsidized by providing various forms of financial assistance to make rent payments affordable for low-income families. The table below captures several other categories of publicly-assisted units in the New Orleans area.

Other Publicly Supported Housing New Orleans Jurisdiction	
HANO Single Room Occupancy	154
LHC Shelter Plus Care	995
LHC Permanent Supportive Housing	689
HUD Veterans Affairs Supportive Housing	265
City of N.O. Shelter Plus Care	49
HOPWA/HOME Tenant Based Rental Assistance	317

- v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

HUD-provided data is insufficient to allow a full comparison between the demographics within all categories of the city’s publicly supported housing and the demographic composition of the census tracts in which developments are located. Working with available data, this AFH includes a limited analysis of the public housing and Project-based Section 8 housing categories.

**Public Housing:**

HANO’s public housing properties are comprised of one or more Asset Management Projects (AMPs), and the AMPs are generally associated with each property’s “redevelopment phases.” For example, the Faubourg Lafitte property is comprised of two AMPs – Lafitte I and Lafitte II.

To address this AFH component, Public Housing AMPs were grouped by development and evaluated in the context of each development’s corresponding census tract locations. Findings are summarized as follows:

The racial and ethnic demographics of Columbia Parc, Fischer, Guste, The Estates (formerly Desire), Marrero Commons, and Westbank Scattered Sites were closely aligned with the demographic compositions of the census tracts in which they are located – with Black households comprising greater than 90% of households and households in other racial/ethnic categories aggregated at less than 10%. The River Garden development, which has no White households, is located in a more racially and ethnically diverse census tract which is 16% White. Finally, as highlighted below, the Downtown and Uptown Scattered Sites properties demonstrate significantly different demographics from their respective census tracts which are also characterized by poverty rates of less than 20%.

	% White	% Black	% Hispanic	% Asian
Downtown Scattered Sites	0	100	0	0
Census Tract 22071000602	41	50	6	1
Uptown Scattered Sites	0	100	0	0
Census Tract 22071010600	60	33	4	1

**Project-based Section 8 Housing:**

Developments in the Project-based Section 8 category were also reviewed within the context of their respective census tract locations. Specifically, there were 17 such properties analyzed, the vast majority of which are elderly housing complexes. 11 of the 17 Project-based Section 8 developments have racial/ethnic characteristics similar to the census tracts in which they are located. These include: St. John Berchman's Manor, St. Martin House, Peace Lake Towers, Satchmo Plaza, The Terraces on Tulane, Mater Dolorosa, Nazareth Inn, St. Michael Senior Housing, Annunciation Inn, Garden Oaks Towers, and Renaissance Place. The six remaining properties in the Project-based Section 8 category show greater differences between their racial and ethnic composition and that of their respective census tracts.

**Table of Project Based Section 8 Comparison to Census Tract**

	% White	% Black	% Hispanic	% Asian
Tivoli Place Apartments	21	78	1	0
Census Tract 22071013400	62	23	6	7
Pine Street Apartments	13	87	0	0
Census Tract 22071012800	66	19	8	4
Delille Inn	2	96	2	0
Census Tract 22071001751	11	61	22	4
Christopher Inn	50	47	3	1
Census Tract 22071002600	73	16	6	2
Chateau D'orleans	0	100	0	0
Census Tract 22071001750	1	33	10	54
Nazareth II	9	89	2	0
Census Tract 22071012800	66	19	8	4

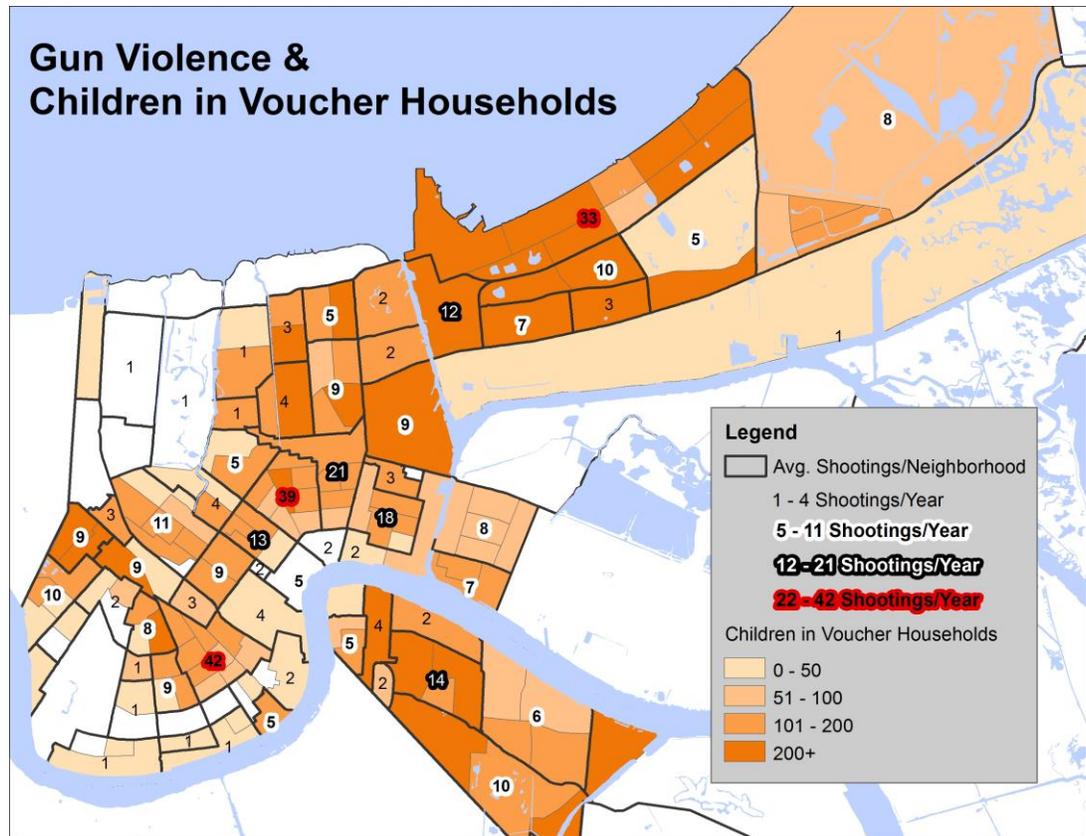
**c. Disparities in Access to Opportunity**

- i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Maps 5 and 6 show that all categories of publicly supported housing are predominantly located either within or in close proximity to R/ECAPs where Black households comprise 84.08% of the population and families with children comprise 46.72% of the population. Additionally, Table 6 shows that 71.05% of Black households are classified as low-income (0-80% AMI) under HUD's criteria.

According to a 2014 Orleans Parish Place Matters report, persistent poverty can have multiple negative effects on the growth and development of youth, creating disparities in economic opportunity. These disparities in economic opportunity (primarily in the R/ECAP areas) result in high unemployment, often leading to crime and violence ([www.PlaceMattersforEducationinOrleansParish.org](http://www.PlaceMattersforEducationinOrleansParish.org), 2014). In addition, according to *HousingNOLA*, a majority of jobs in New Orleans' key economic sectors pay below the City of New Orleans' median income of \$26,500. Disparities in access to opportunity for residents of publicly supported housing can be attributed to limited public transportation, limited public services, and limited economic investment in some of the R/ECAP areas defined by HUD as having a majority Non-White population greater than 50%, with more than 40% living at or below poverty ([www.HousingNOLA.org](http://www.HousingNOLA.org), 2015). Education, environment, health, social, as well as political indicators were measured in a study released in January 2015 by the Greater New Orleans Foundation entitled "The Geography of Opportunity," which examined and analyzed access to opportunity across the New Orleans region ([www.HousingNOLA.org](http://www.HousingNOLA.org), 2015). The study highlights that where a person lives geographically can have long-range effects on a person's life, physically, emotionally, as well as economically.

Disparities in access to opportunity are particularly sharp in the HCVP. A GNOFHAC analysis of the HCV Program found that the 13 neighborhoods with zero shootings per year are home to less than 2% of all children in the voucher program. Conversely, the 12 neighborhoods with 10 or more shootings per year are home to 55% of all children in the voucher program (Picture of Subsidized Households, Resident Characteristics Report, and The Advocate's "New Orleans Neighborhood Gun Violence Index"). The percentage of low birth weight babies is another indicator of health outcomes that disproportionately affects neighborhoods where voucher holders are concentrated. When neighborhoods are ranked by their percentage of low birth weight babies, neighborhoods in the top third (rates of 14% or higher) are home to more than half of all children in the voucher program. Neighborhoods in the bottom third (rates of 9% or below) are home to only 5% of children in the voucher program (Picture of Subsidized Households, Resident Characteristics Report, and *Child and Family Health in New Orleans* (2013) New Orleans Health Department). *HousingNOLA* also highlighted the lack of transit access for HCVP households. Only 8% of voucher holders live within a quarter-mile of a transit stop with 15 minute headways or less.



As reflected in Table 12, when comparing indices for disparities in access to opportunity for persons both above and below the poverty line, African-Americans have the least access to opportunity in all categories.

## 2. Additional Information

- Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

### VASH (Veterans Affairs Supportive Housing)

In April of 2015, HANO received 56 vouchers under the Veterans Affairs Supportive Housing (VASH) program, and, in April 2016, HUD invited HANO to apply for 22 additional VASH vouchers to be administered in partnership with the Department of Veterans Affairs (VA) facility and Southeast Louisiana Health Care System/New Orleans VA Medical Center. In response, the Agency has recently applied to HUD for an additional 22 VASH vouchers in the 2016 funding cycle.

- The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

HANO's Homeownership Department was created to assist public housing and HCVP residents with becoming first time homebuyers. HANO screens and refers clients to HUD approved homebuyer and financial fitness programs for the training and preparation required to meet first time homebuyer eligibility. HANO recruits and trains lenders and real estate agents in the HCVP program. HANO staff also works closely with providers of soft second mortgages and other assistance programs and assists families with accessing such funding. In addition, the Homeownership Department participates in the planning and monitoring of homeownership programs that are a component of HANO's development projects.

The homebuyer pays 30% of their adjusted monthly income toward the mortgage payment of principal, interest, taxes and insurance payments. However, households can pay up to 40% if their mortgage payment exceeds the voucher payment standard. The Section 8 HAP contribution can be utilized to pay the difference between the actual mortgage and the portion that can be paid by the homebuyer.

HANO may refer Section 8 homebuyers to community organizations for additional subsidies to reduce the principal cost of their homes or to apply toward a second mortgage. In addition, the City of New Orleans' Soft Second Mortgage Pool provides Section 8 homebuyers with a subsidy that is funded under the HOME Investment Partnership Program. Subsidies may be provided to families earning 80% or less of the AMI. This second mortgage is forgiven if the homebuyer maintains the property for a given period of affordability and if the buyer does not default on the first or second mortgage.

Section 8 families are encouraged to participate in HANO's Family Self-Sufficiency Program in order to gain an additional subsidy for the purchase of a home. The program encourages self-sufficiency by contributing to an escrow account for the family upon satisfactory completion of self-sufficiency goals. Participants may apply the escrow funds toward educational, employment and, homeownership expenses.

The major obstacle to affordable homeownership opportunities for HANO's Section 8 participants is the cost of housing in New Orleans. The median home sales price in Orleans Parish is over \$180,000. However, since the start of the program in 2001, HANO has assisted 284 public housing and voucher participants in becoming homeowners. It provides direct technical assistance and referrals to families through the entire home buying process, from the completion of an application to loan closing.

According to HUD data, as of July 31, 2016, the demographics of 195 active homeownership households are as follows:

<b>Demographic Snapshot of HANO’s HCV Homeownership Program Participants Report on 195 Households As of July 31, 2016</b>	
Households with Children	112 (57%)
Female Headed Households with Children	109 (55%)
Households Including Persons with Disabilities	50 (26%)
Elderly Households	23 (12%)
Race	99% Black / 1% White
Ethnicity	6% Hispanic / 94% Non-Hispanic
Average Annual Income	\$22,126

**3. Contributing Factors-of Publicly Supported Housing Location and Occupancy**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

**Admissions and occupancy policies and procedures, including preferences in publicly supported housing:**

At the first Public Hearing, a resident said they could not get public housing and that the only option left for people was Habitat for Humanity. In addition, some residents expressed real concern over HANO’s termination of housing assistance for some residents. Included in this criticism of the termination process at HANO were concerns over how minor infractions over little incidents could result in residents being evicted.

Most housing admissions are at the discretion of private landlords and some of the comments received indicated that costs as well as discrimination are factors in housing admission decisions.

HANO maintains a waiting list for available units that greatly exceeds available units. According to the public comments, the income limits for public housing are an obstacle for some people. They feel that “HCV is for very, very low income people.”

**Land use and zoning laws:**

At the first Public Hearing some residents expressed concerns that current City Planning Commission policies and practices are pricing them out of their neighborhoods.

**Community opposition:**

Community opposition can lead to developers withdrawing projects for affordable housing leaving a number of low and very low income households disproportionately affected, as the overwhelming need for affordable housing in New Orleans has not been met. Housing NOLA estimates that 33,000 affordable units are needed in New Orleans in the next 10 years.

**Impediments to mobility:**

- A number of landlords are unaware of how to become a landlord with the HCV program as indicated by public hearing comments. Using a metro-wide Fair Market Rent as a base for HCVP payment standards does not allow HCV tenants the ability to reach higher rent high opportunity neighborhoods.
- HCVP households do not have access to a robust mobility counseling program that includes pre-move counseling, housing search assistance—including tours of different neighborhoods—an orientation to the new neighborhood, and post-move support.

**Lack of private investment in specific neighborhoods:**

Many neighborhoods have undergone rebuilding and restoration since Hurricane Katrina, but some continue to lack private amenities. Often times, private investment decisions are based upon the opportunity to gain profit for the organization making the investment. A business will look at four elements in an opportunity: a need, means to fulfill the need, method to apply the means to fulfill the need, and a method to benefit. [https://en.wikipedia.org/wiki/Business\\_opportunity.org](https://en.wikipedia.org/wiki/Business_opportunity.org)

As such, the private entities will make the decisions from existing information about an area, typically from the U.S. Census to determine if they have an opportunity to provide goods or services and make a profit doing so. With profit being the driving factor, businesses will locate where they can meet their profit expectations. In low opportunity areas, while need may be present, often times the “method to benefit” may be lacking.

**Lack of public investment in specific neighborhoods, including services and amenities:**

Public investments in neighborhoods have recently been on the increase in the City. For the past ten years, the City has repaired or renovated community centers, healthcare facilities, and rebuilt playgrounds. The City’s Department of Public Works maintains a list of repair and improvement projects throughout the entire City which details the specific locations of that work. <http://www.nola.gov/dpw/projects/all/.org>

In some cases, catalytic public investments in well-located, low-income, historically Black neighborhoods have contributed to their transformation into higher-priced areas. One consequence is that HCVP households who may have previously been able to rent in these neighborhoods on higher ground and with better access to jobs and amenities can no longer afford to do so.

**Lack of regional cooperation:**

This topic drew comments due to the lack of regional transportation. Participants cited the difficulty in traveling across the region on public transit and therefore, to where jobs are: “Jobs that are close to home don’t pay that much,” was a comment made at the public hearing held on July 19, 2016, as part of the AFH process.

**Source of income discrimination:**

Some residents have expressed that the housing needs of residents that do not participate in subsidized housing programs are not met as some landlords with affordable housing have a preference to lease to Section 8 voucher holders instead of renters who lack any subsidy. Others

have expressed that landlords discriminate against leasing to HCV voucher holders based on the stigma associated with having a voucher.

## **D. Disability and Access Analysis**

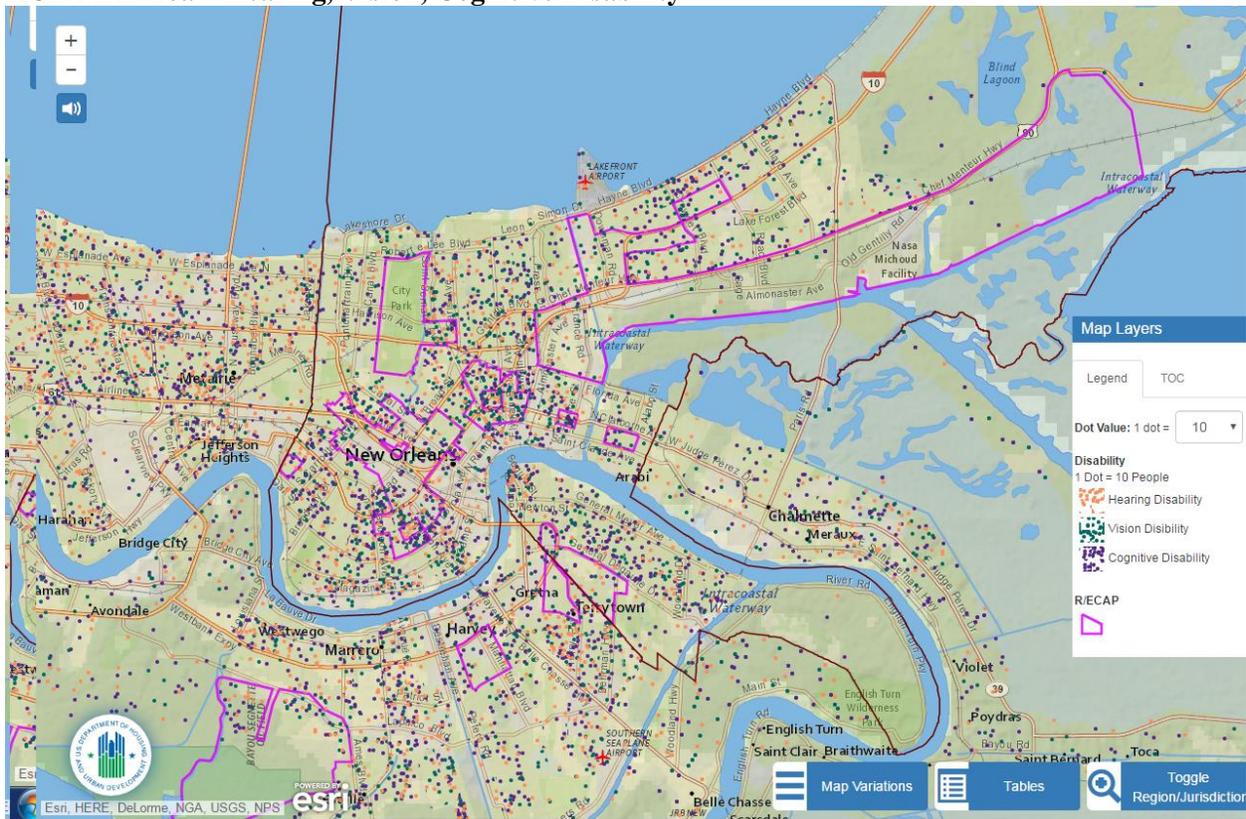
### **1. Population Profile**

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

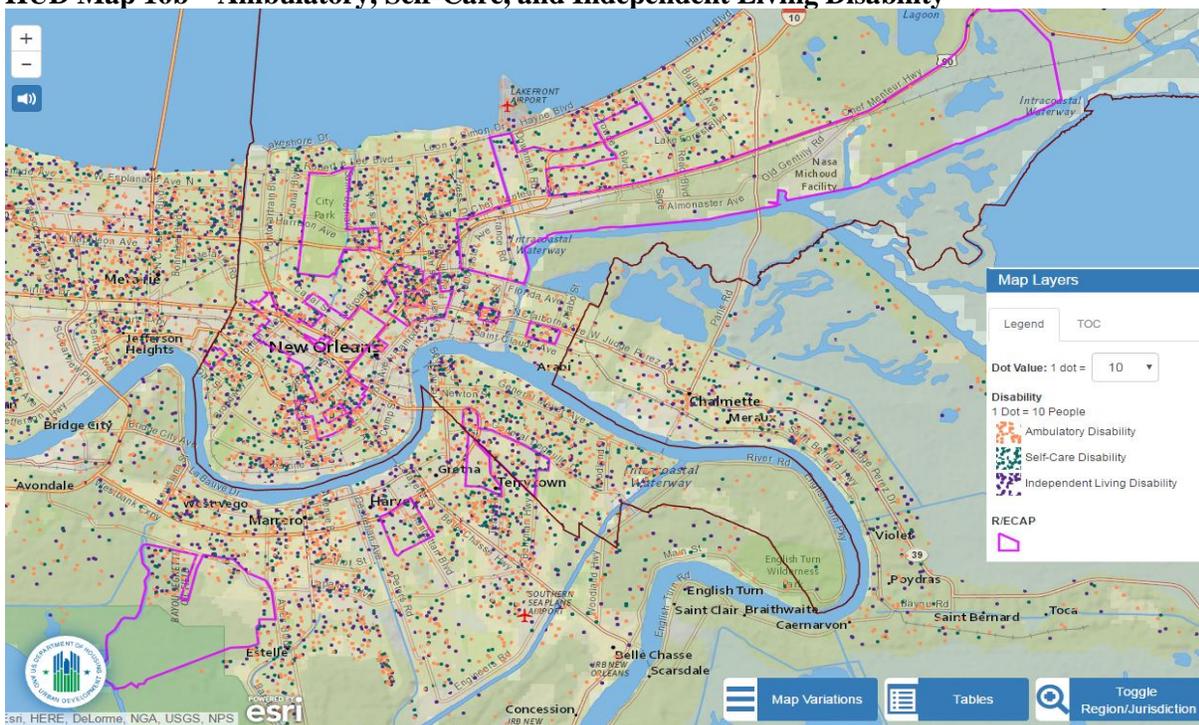
Maps 16a and 16b below depict the number of persons with disabilities living in various parts of the City and the region, including those who live in R/ECAPs and segregated areas. The data leads to several conclusions:

- Persons with disabilities are fairly evenly dispersed throughout the city. Areas where fewer persons with disabilities reside include the English Turn, New Orleans East, and Metairie Cemetery/County Club, which are areas that have had a 60 to 100% decrease in public transportation service into the Central Business District. (P. 14, <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>)
- In the region, the areas that show smaller populations of persons with disabilities appear to be the St. Bernard Parish area, Avondale/Bridge City, and Elmwood area. However, this observation could simply reflect lower population densities in these areas.

## HUD MAP 16a – Hearing, Vision, Cognitive Disability



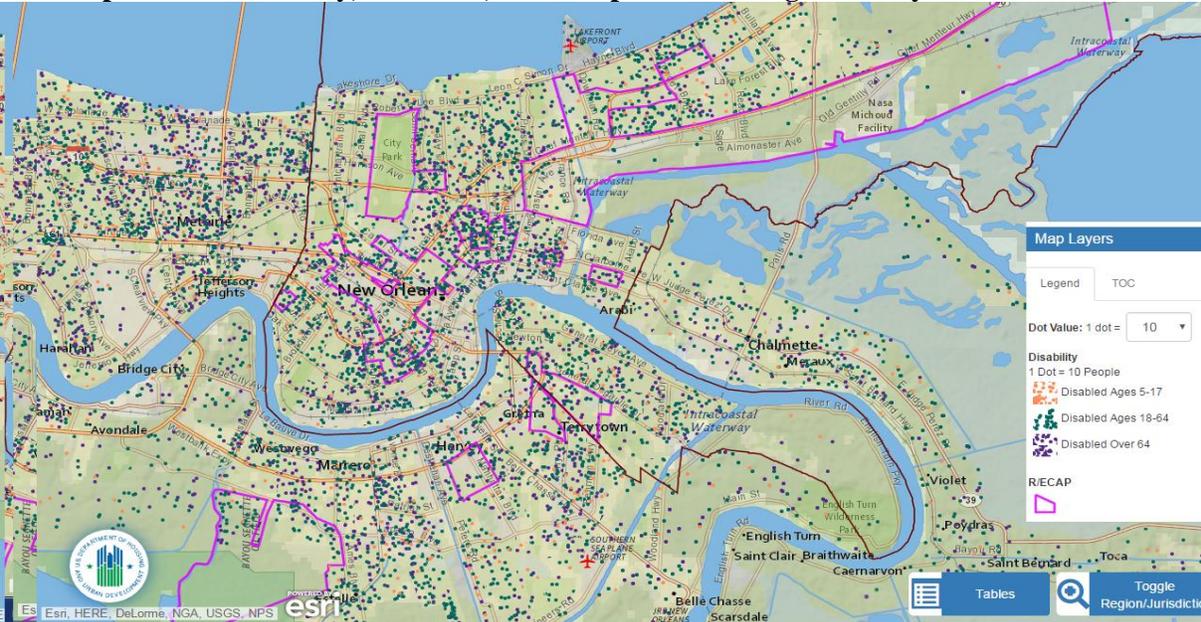
## HUD Map 16b – Ambulatory, Self-Care, and Independent Living Disability



- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Map 17a below shows that persons with disabilities in different age ranges and persons with different types of disabilities all have similar residential patterns. In other words, they are also evenly dispersed through the city and the region except for the English Turn, New Orleans East, and Lakeview. The same holds true for the region except for the St. Bernard Parish area, Avondale/Bridge City, and Elmwood. This map also shows that majority of persons with disabilities in the city are non-elderly adults.

**HUD Map 17a – Ambulatory, Self-Care, and Independent Living Disability**



## 2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The data in the tables below shows that neither the City of New Orleans nor the metropolitan region has a sufficient supply of affordable, accessible housing.

The number of persons with disabilities in New Orleans is approximately 49,600. When comparing the approximate number of individuals in New Orleans with disabilities to the number of households in publicly supported housing that include persons with disabilities (6,934), it appears that the City needs far more affordable, accessible units to provide opportunities for community integration for this protected class.

If one only reviews one type of disability, such as ambulatory disabilities, it remains clear that there is not enough accessible, affordable housing to support the 26,013 individuals with ambulatory disabilities. Although not all of those 26,013 individuals are income-eligible for affordable housing and some reside in households including multiple persons with ambulatory disabilities, there is a significant correlation between disability status and household income.

**Publicly Supported Housing by Program Category: Units with number of Bedrooms**

<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>								
<b>Households</b>	<b>0 Bedroom</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>	<b>5 Bedroom</b>	<b># Disabled</b>	<b>% Disabled</b>
<b>Housing Type</b>								
Public Housing <sup>1</sup> (1,868) <sup>3</sup>	0	654	467	617	112	0	867	46%
Project-Based <sup>1</sup> Section 8 (1,309)	27	707	354	184	27	0	515	39%
Other Multifamily (494) <sup>2</sup>	-	490	4	0	-	-	25	5%
HCV Program <sup>1</sup> (16,643)	166	2497	6324	6324	1166	166	5527	54%
Note 1: Data Sources HUD Resident Characteristics Report								
Note 2: Data Sources: APSH provided 0-1 Bedrooms, 2 bedrooms, and 3+ bedrooms only.								
Note 3: Number of bedrooms do not add to total due to rounding percentages on HUD Characteristic Report.								
Note 4: Regional data from HUD Resident Characteristics Report incomplete.								

**HUD Table 13 – Disability by Type**

	<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>		<b>(New Orleans-Metairie, LA CBSA) Region</b>	
<b>Disability Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Hearing difficulty	9,626	2.92	41,612	3.72
Vision difficulty	11,234	3.41	31,920	2.86
Cognitive difficulty	20,488	6.22	66,092	5.92
Ambulatory difficulty	26,013	7.90	86,930	7.78
Self-care difficulty	9,930	3.02	31,902	2.86
Independent living difficulty	17,305	5.26	55,662	4.98
<b>TOTAL Disabled*</b>	<b>94,596</b>		<b>314,118</b>	
<i>Note: Total may have counted individuals more than once due to multiple disabilities. Although rare, it's conceivable that a person with multiple disabilities could be counted as many as 6 times.</i>				

According to the Advocacy Center of Louisiana, there is a critical shortage of affordable, accessible housing for people in Orleans Parish living with a disability. Approximately 14% of the non-institutionalized population of Orleans Parish lives with a disability. This population includes people with ambulatory difficulties, independent living difficulties, and self-care difficulties. For some of these individuals, Supplemental

Security Income (SSI) is their only source of income. Fair Market Rents have so far outpaced SSI payments for persons with disabilities that a small one-bedroom unit would cost a renter 116% of their monthly payment. <http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>)

The City of New Orleans 2012-2016 Consolidated Plan provides information from survey respondents indicating whether they had a disability. It is estimated that 55% of the local homeless population has a disability, a much higher percentage than the national rate of 40%. There are currently 2,382 homeless persons experiencing at least one disability on any given night in New Orleans. The prevalence of disabilities is most severe highest among homeless individuals living on the street and in abandoned building.

<http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>)

- b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

Table 7 below reflects the percentages of persons with disabilities living in publicly supported housing within and outside of R/ECAPs. The table shows that 1,427 occupied public housing units are located in R/ECAPs, and persons with disabilities reside in 40.87% of those units. Although the percentages of persons with disabilities in R/ECAPs who live in Project-Based Section 8 units or who have vouchers 8 are lower than the percentage in public housing, the percentage is still substantial with persons with disabilities residing in 28.07% of the occupied units for Project-Based Section 8 and 23.01% of the occupied HCV units. Only Other Multifamily sites show a slightly greater percentage of persons with disabilities living outside of rather than within R/ECAPs. See table below.

**Table 7 - R/ECAP and Non-R/ECAP Publicly Supported Housing Program Category**

<b>(New Orleans, LA CDBG, HOME, ESG) Jurisdiction</b>	<b>Total # units (occupied)</b>	<b>% with a disability</b>
<b>Public Housing</b>		
R/ECAP tracts	1,427	40.87
Non R/ECAP tracts	257	13.51
<b>Project-based Section 8</b>		
R/ECAP tracts	1,816	28.07
Non R/ECAP tracts	2,321	17.30
<b>Other HUD Multifamily</b>		
R/ECAP tracts	181	12.22
Non R/ECAP tracts	315	13.06
<b>HCV Program</b>		
R/ECAP tracts	6,192	23.01
Non R/ECAP tracts	12,399	19.95

- c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

The table below depicts the percentage of people with disabilities living in publicly supported housing in the city and the region. The number of people living in publicly supported housing is only a small fraction of the population of persons with disabilities.

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	People with a Disability*	
	#	%
Public Housing	534	36.08
Project-Based Section 8	907	22.12
Other Multifamily	63	12.75
HCV Program	3,893	20.84
<b>(New Orleans-Metairie, LA CBSA) Region</b>		
Public Housing	735	27.46
Project-Based Section 8	1,030	16.21
Other Multifamily	100	11.48
HCV Program	5,424	20.88

### 3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

- a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

In 1999, the U.S. Supreme Court issued its landmark *Olmstead v. L.C.* ruling that Title II of the American with Disabilities Act requires states to serve individuals in the most integrated setting appropriate to their needs and consistent with their informed choice. The decision sparked lawsuits to secure community-based services for institutionalized persons as well as other individuals who are at risk of institutionalization, absent community-based services. [http://www.ndrn.org/images/Documents/Issues/Community\\_integration/Resources/NDRN\\_Litigation\\_Status\\_122704.pdf](http://www.ndrn.org/images/Documents/Issues/Community_integration/Resources/NDRN_Litigation_Status_122704.pdf)

#### Year 2000 Case

In April 2000, five individuals (two with developmental disabilities and three with physical disabilities) along with Resources for Independent Living filed a complaint in the U.S. District Court for Eastern Louisiana against the Louisiana Department of Health and Hospitals (DHH) alleging that the state was violating the ADA and §504 of the Rehabilitation Act by restricting the availability of services to “unnecessarily segregated settings” such as nursing homes. The plaintiffs with non-developmental disabilities sued for access to the state’s elderly and disabled and/or personal care attendant Medicaid waiver programs. The plaintiffs with cognitive disabilities wanted access to Louisiana’s developmental disabilities and personal care attendant Medicaid waiver programs. The plaintiffs charged that Louisiana spent “90% of its Medicaid funds on institutional services.” They asked the Court to: grant class certification to Louisianans with disabilities who are unnecessarily institutionalized and find the state in violation of the ADA and §504 of the Rehabilitation Act.

In August 2001, DHH Secretary David Hood unveiled a settlement agreement that provided for boosting state spending by \$118 million over a four year period in order to provide

community-based services to 1,700 more individuals and reduce waiting time for services to 90 days or less. The settlement plan submitted by DHH, agreed to by the plaintiffs and approved by the court addressed four broad areas: (a) reducing the waiting time for community-based services; (b) supporting people to make informed choices about service options; (c) adding a Medicaid state plan personal care services option; and (d) instituting individualized long-term care assessments through a new single point of entry system. In the agreement, the state committed to eliminate the waiting list for waiver services by 2005. The Louisiana Nursing Home Association objected to the personal care coverage, but the court turned the objection aside.

In 2003, DHH submitted a \$38 million request to the Louisiana legislature to fund the addition of personal care to the Medicaid state plan, but the legislature balked at this request. Instead, it appropriated \$28 million, instructed DHH to delay adding personal care to the Medicaid state plan, and directed state officials to return to court to seek a modification of the settlement agreement to further expand Home and Community Based Services waiver programs in lieu of adding personal care to the state plan. In July 2003, as directed by the legislature, the state filed a motion to amend the settlement agreement. The Louisiana Advocacy Center, which represented the plaintiffs, opposed changing the agreement. The American Association of Retired Persons filed an *amicus* brief in support of the Advocacy Center's motion. In the meantime, nursing home interests filed a motion to intervene in support of the state's proposed modification, expressing concern that the activating the personal care option might put their businesses at risk.

In September 2003, the court denied the state's motion to modify the settlement, directed it to comply with the settlement order, and rejected the nursing home industry's request to intervene.

#### Year 2010 Case

In 2010, the Advocacy Center brought a case on behalf of four individuals with disabilities who receive and depend on Medicaid Personal Care Services (PCS) in order to remain in the community and to prevent hospitalization and institutionalization. Plaintiffs filed suit to prevent Louisiana from reducing the maximum number of PCS hours available each week. The U.S. Department of Justice filed a Statement of Interest supporting the Plaintiffs' argument that the cuts would place individuals with disabilities at risk of institutionalization and urging the Court to deny the state's motion for summary judgment.

In May 2011, the District Court denied the state's Motion for Summary Judgment. In June 2011, the court granted the Plaintiffs' motion to certify a statewide class of individuals affected by the reduction in PCS services.

In February 2012, the parties reached a settlement agreement requiring that slots on the Community Choice Waiver program be set aside for people who were approved for more than 32 hours of long-term personal assistance services before the 32-hour cap took effect. The Community Choice Waiver program, which has a four-year waiting list for most people who are not currently in nursing facilities, provides personal care services as well as a variety of other services that enable people to remain in their homes and communities. Additionally, the state will offer waiver services on an expedited basis to class members who apply if they can show that without the additional services, they will not be able to maintain their health and are at serious risk of nursing facility placement. The settlement requires the Louisiana Department of Health to ask the federal government for approval for Community Choice Waiver services for an additional 200 people in order to meet the needs of class members. If any of these are

not needed for class members, they will be added to the pool that is available to meet the needs of others who are waiting for the services. Further, the state must “use its best efforts” to fund Community Choice Waiver services for an additional 500 people in the governor’s executive budget.

- b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

According to the Louisiana Developmental Disabilities Council the following supportive services exist (<http://www.laddc.org/Initiatives.cfm?aid=6&id=17>):

- Supported Living for adults with behavioral health needs is available in five regions of the state (New Orleans, Baton Rouge, Houma/Thibodaux, Alexandria and Shreveport). Limited funding is available to assist individuals who are making or have made the transition from institutional settings to the community. Support coordination, rental assistance, furniture, and transportation are the types of assistance that are available.
- Supported Living services are available for a very small number of adults whose disability occurred after the age of 22 but before the age of 55. Limited funding is available to assist individuals moving out of nursing homes into the community or to those at risk of institutionalization. Support coordination, rental assistance, furniture, and transportation are the types of assistance that are available.
- Medicaid Home and Community Based Waiver Services allow people the flexibility to decide where they want to live and to access supports and services that best meet their individualized needs. Louisiana has four Developmental Disability waivers, each with a specific service package and eligibility requirements: the New Opportunities Waiver, the Children’s Choice Waiver, the Residential Options Waiver, and the Supports Waiver.
- The Flexible Family Fund provides a monthly stipend of \$258 to families of children with the most severe developmental disabilities to offset the costs of meeting their child’s needs in their own home.
- Individual and Family Support provides an array of flexible supports and services to allow people with developmental disabilities to live in their own homes or with their families in their own community. These supports are available based on priority of need, rather than first-come, first-served. There is no menu of services, but rather the supports are flexible to meet individual needs.
- Permanent Supportive Housing - In addition, HANO, the City of New Orleans, and other nonprofits offer affordable housing for persons with disabilities who have supportive service needs. HANO houses low-income persons with disabilities in public housing, project-based, and HCV units. Permanent supportive housing vouchers are also available through HANO and the City of New Orleans. The City of New Orleans also provides financial assistance so that homeowners who have disabilities can make repairs to their homes. Based on information obtained from the City of New Orleans’ 2012-2016 Consolidated Plan, there were 1,857 persons living in permanent supportive housing in the city as of 2012. <http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>, pages 47-48.

#### 4. Disparities in Access to Opportunity

- a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

- i. Government services and facilities

On July 26, 2007, the U.S. Department of Justice entered into an amended settlement agreement with the City of New Orleans, Louisiana, under the Americans with Disabilities Act of 1990 (ADA) to make physical changes to specified facilities within specific time frames in order to come into compliance with ADA requirements.

<https://www.ada.gov/newola.htm>

The Jefferson Parish Council recently approved moving more than two dozen polling precincts as part of a settlement agreement in the federal case entitled *Drake v. Jefferson Parish*. The polling precincts did not meet the requirements of the ADA and the Rehabilitation Act. The suit that produced the settlement — originally filed in 2010 by Kenner resident Denise Drake, who suffered from a debilitating neurological disease — alleged that people in wheelchairs had too many barriers to overcome to cast their ballots at their polling places.

[http://www.theadvocate.com/new\\_orleans/news/communities/east\\_jefferson/article\\_f5d6577d-8238-592f-868e-83f31e2d3667.html](http://www.theadvocate.com/new_orleans/news/communities/east_jefferson/article_f5d6577d-8238-592f-868e-83f31e2d3667.html)

- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of New Orleans first installed the Accessible Pedestrian Signal (APS) located at McAlister crosswalks on the Tulane University campus in March 2016. It produces an audible beeping that helps persons with visual disabilities people know when it is safe to cross the road. It is the only APS in the city.

[https://www2.tulane.edu/news/newwave/031716\\_aps\\_crosswalks.cfm](https://www2.tulane.edu/news/newwave/031716_aps_crosswalks.cfm)

In addition, the majority of schools have documented that sidewalks and curb ramps are poor or missing. See table on subsequent pages.

[http://prc.tulane.edu/uploads/kidswalk\\_coalition\\_web\\_final-1305305697.pdf](http://prc.tulane.edu/uploads/kidswalk_coalition_web_final-1305305697.pdf)

Sidewalks in New Orleans remain in a state of disrepair. Cracks are present on the majority of sidewalks, making movement in a wheelchair uneven and bumpy. The roots of trees upend sidewalks, making the traverse quite difficult at times. Some sidewalks are not equipped with curb cuts, making them inaccessible to the independent wheeler.

<https://wheelchairtravel.org/new-orleans-la/>

- iii. Transportation

Based on a study commissioned by the RTA, only 5.7 percent of bus stops are ADA compliant.

[http://www.nola.com/traffic/index.ssf/2016/03/new\\_orleans\\_faces\\_lawsuit\\_over.html](http://www.nola.com/traffic/index.ssf/2016/03/new_orleans_faces_lawsuit_over.html)

The St. Charles streetcar is not ADA accessible.

[http://www.nola.com/politics/index.ssf/2016/04/new\\_orleans\\_st\\_charles\\_streetc.html](http://www.nola.com/politics/index.ssf/2016/04/new_orleans_st_charles_streetc.html)

LIFTA paratransit services are available and feature modified vans that are equipped with lifts to accommodate passengers who use wheelchairs with door-to-door pick-up. Paratransit passengers must first be certified as eligible to use the services, which usually consists of filing an application that describes the passenger's disability, explains why they are unable to use regular transit, and includes the signature of a health care professional. This can be a time consuming process for someone who lacks transportation. After the submission, it may take up to three weeks for the RTA to process the application for paratransit services prior to the passenger receiving a letter in the mail about the decision. Once deemed eligible, the passenger must then make advance reservations for transportation. <http://www.norta.com/Accessibility/Eligibility-for-Paratransit.aspx>

As of 2014, the city of New Orleans had only a single wheelchair accessible private taxi. <https://wheelchairtravel.org/new-orleans-la/>

iv. Proficient schools and educational programs

The below chart completed in 2011 shows barriers for children with ambulatory disabilities in accessing proficient schools.

## Ambulatory

([http://prc.tulane.edu/uploads/kidswalk\\_coalition\\_web\\_final-1305305697.pdf](http://prc.tulane.edu/uploads/kidswalk_coalition_web_final-1305305697.pdf))

School Campus	Sidewalks poor or missing	Curb Ramps poor or missing	Crosswalk Rating	School Zone Signage Rating	Total Score	School Campus	Sidewalks poor or missing	Curb Ramps poor or missing	Crosswalk Rating	School Zone Signage Rating	Total Score
A.P. TUREAUD ELEMENTARY 2421 Payer St.	30.62%	45.2%	N/A	60%	33%	JOSEPH CIVIC ELEM 1423 St. Philip St.	2.80%	66.3%	N/A	94%	76%
ABRAMSON SCI & TECH CHARTER 1552 Read Blvd.	28.87%	62.3%	1.00	60%	43%	JULIAN LEADERSHIP ACADEMY 2015 Lawrence St.	12.39%	100.0%	-1.00	71%	43%
AKILI ACADEMY OF N.O. 1700 Pratt Dr.	26.54%	82.6%	N/A	75%	38%	KIPP BELIEVE COLLEGE PREP 1467 S. Carrollton Ave.	20.22%	60.0%	N/A	27%	19%
ALICE HARTE CHARTER 3500 Bealway St.	10.27%	89.4%	0.50	53%	40%	KIPP CENTRAL CITY ACADEMY 2145 Thalia St.	26.98%	56.9%	N/A	71%	38%
ANDREW WILSON CHARTER 4879 General Pershing St.	14.71%	23.4%	N/A	36%	38%	KIPP MCDONOGH 15 SCHOOL FOR THE CREATIVE ARTS 721 St. Philip St.	0.91%	57.7%	-0.50	94%	74%
ARTHUR ASHE CHARTER 3849 Laurel Street	25.96%	50.0%	N/A	80%	48%	LAFAYETTE ACADEMY 2727 S. Carrollton Ave.	5.48%	12.8%	0.00	80%	81%
AUDUBON CHARTER EXT 719 S. Carrollton Ave.	8.73%	17.9%	0.50	72%	74%	LAKE FOREST CHARTER ELEM 2200 Hayes Blvd.	32.23%	100.0%	-1.00	100%	43%
AUDUBON CHARTER 428 Broadway St.	17.08%	98.8%	-1.00	88%	52%	LANGSTON HUGHES ACADEMY CHARTER 3319 Trafalgar St.	7.26%	70.4%	0.00	92%	76%
BENJAMIN BANNEKER ELEM 421 Bardette St.	31.31%	31.6%	0.67	43%	17%	LUSHER CHARTER ELEM 7115 Willow St.	15.03%	82.3%	-1.00	60%	43%
BENJAMIN E. MAYS PREP SCHL AT CARVER ELEM 3702 Higgins Blvd.	39.44%	100.0%	N/A	25%	10%	LUSHER CHTR MIDDLE & HIGH / N.O. CHTR SCI & MATH HIGH 5104 Front St. / 3825 Loyola Ave.	11.40%	60.3%	0.00	93%	67%
BENJAMIN FRANKLIN ELEM MATH & SCIENCE 1116 Jefferson Ave.	8.99%	86.8%	N/A	44%	38%	MARTIN BEHRMAN ELEM 715 Claiborne Ave.	27.67%	79.0%	-1.00	74%	33%
CROCKER ARTS & TECH 1111 Milan St.	17.31%	44.5%	0.25	82%	63%	MARY BETHUNE ELEM 4940 English St.	20.59%	78.7%	N/A	80%	48%
D.R. BATISTE CULTURALARTS ACADEMY AT LIVE OAK 3148 Camarillo St.	17.84%	51.4%	-1.00	50%	33%	MARY D. COCHILL ELEM 5900 Paup Dr.	7.94%	70.6%	N/A	80%	67%
DR. CHARLES DREW ELEM 3876 St. Claude Ave.	23.01%	64.9%	0.00	36%	19%	MCDONOGH 34 ELEM 800 Dukeman St.	28.47%	72.7%	-0.25	100%	56%
DR. MLK CHARTER SCHL FOR SCIENCE AND TECHNOLOGY 1873 Carlin Ave.	44.36%	46.1%	-1.75	67%	15%	MCDONOGH 35 COLLEGE PREP HIGH SCHOOL 1371 Ardmore St.	22.40%	38.1%	N/A	0%	19%
DWIGHT EISENHOWER ELEM 3700 Tall Pine Dr.	25.21%	93.8%	-1.00	57%	24%	MCDONOGH 43 CHARTER 1357 N. Saint	17.09%	65.7%	0.00	89%	57%
EDGAR P. HARNEY ELEM 1503 Willow St.	17.36%	76.9%	0.00	50%	38%	MCDONOGH CITY PARK ACAD 2933 Esplanade Ave.	8.05%	69.4%	N/A	25%	38%
EDWARD HYNES 2774 Conolly Blvd.	16.43%	61.8%	0.33	67%	49%	MEDARD NELSON - UNO CHARTER 321 St. Bernard Ave.	8.07%	93.2%	-1.00	64%	52%
EINSTEIN CHARTER 5100 Canine St.	35.48%	36.4%	-1.00	83%	38%	MILESTON/SABIS CHARTER 1937 Patton St.	8.34%	30.6%	-0.33	64%	60%
ELEANOR MCMAIN 3723 S. Claiborne Ave.	11.60%	60.6%	0.00	50%	38%	MILLER-MCCOY ACADEMY FOR MATH & BUSINESS 3701 Dwyer Rd.	51.32%	83.3%	-1.00	25%	0%
ESPERANZA CHARTER 4407 S. Carrollton Ave.	27.48%	36.8%	-0.33	45%	22%	NEW ORLEANS COLLEGE PREP ELEM & MIDDLE/HIGH 3107 Martin L. King Blvd.	41.57%	59.3%	N/A	67%	19%
FANNIE C. WILLIAMS ELEM 1753 Dwyer Rd.	32.32%	36.1%	N/A	67%	33%	PAUL HABANS ELEM 3819 Marshell St.	17.16%	40.7%	0.33	36%	35%
GENTILY TERRACE ELEM 4720 Painters St.	14.35%	89.2%	N/A	60%	48%	PIERRE A. CAPDAU-UNO CHARTER ELEM 3181 Franklin Ave.	12.39%	97.2%	0.00	45%	29%
GEORGE W. CARVER HIGH 3659 Higgins Blvd.	56.69%	81.8%	N/A	N/A	0%	ROBERT R. MOTON CHARTER 6100 Chal. Marthon Hwy.	49.17%	96.3%	-0.50	80%	26%
HARRIET TUBMAN ELEM 2013 General Meyer Ave.	22.25%	96.6%	0.00	79%	38%	SAMUEL J. GREEN CHARTER 2112 Voltaire St.	12.26%	38.8%	1.00	41%	38%
HENRY SCHUMBERG ELEM 9501 Grand St.	11.30%	44.9%	-1.00	100%	67%	SCITECH ACADEMY AT LAUREL 800 Jackson Ave.	25.07%	58.1%	-1.00	54%	24%
HOPE ACADEMY AT BOOKER T. WASHINGTON 1201 S. Roman	44.99%	47.3%	N/A	50%	14%	SOPHIE B. WRIGHT CHARTER 1428 Napoleon Ave.	13.72%	44.5%	-0.33	73%	51%
INTERCULTURAL CHARTER SCHL & SARAH T. REED HIGH 3716 Michael Blvd.	35.56%	61.5%	N/A	0%	10%	SUCCESS PREPARATORY ACADEMY AT WICKER ELEM 2021 Bienville St.	50.60%	50.0%	-1.00	93%	5%
INTL SCHL OF LOUISIANA 1400 Camp St.	21.59%	24.2%	-1.00	50%	33%	WALTER L. COHEN HIGH 2300 Dryades St.	23.56%	71.4%	N/A	17%	19%
JAMES M. SINGLETON CHTR 2222 Onetha Castle Hwy Blvd.	9.21%	86.8%	-0.33	30%	37%	WILLIAM J. FISCHER ELEM/ MURRAY HENDERSON ELEM 1101 Whitney Avenue / 2701 Lawrence St.	21.02%	28.8%	0.00	67%	48%
JAMES WELDON JOHNSON ELEMENTARY 1800 Monroe St.	34.93%	45.0%	N/A	79%	33%						
JOHN DIBERT COMMUNITY 4877 Orleans Ave.	16.96%	34.7%	-1.00	46%	29%						
JOHN MCDONOGH HIGH 2428 Esplanade Ave.	42.06%	77.4%	-1.00	N/A	0%						

## Cognitive Disability

As stated earlier in this plan, the Southern Poverty Law Center in its report entitled “Access Denied: New Orleans Parents and Students identify Barriers to Public Education” discusses the policies that create barriers for the disabled protected class in attending proficient schools as it reviews the 2007 to 2009 school periods.

[www.splcenter.org/sites/default/files/d6\\_legacy\\_files/downloads/publication/SPLC\\_report\\_Access\\_Denied.pdf](http://www.splcenter.org/sites/default/files/d6_legacy_files/downloads/publication/SPLC_report_Access_Denied.pdf)

The findings were as follows:

- The graduation rate for RSD students with disabilities was less than half that of the overall graduation rate, and only 6.8% of RSD students with disabilities exited with a high school diploma. Across the state, the average was 19.4%.
- In the 2008-09 school year, RSD schools suspended nearly 30% of all students with disabilities — a rate that was 63% higher than the state average.
- During the 2007-08 school year, 94.6% of eighth grade RSD students with disabilities failed the Louisiana Educational Assessment Program (LEAP) exam. For the same year, 78.3% of all eighth grade charter school students with disabilities in the state failed the LEAP.
- On average, school districts throughout Louisiana have identified 12.2% of their students as eligible for special education services. New Orleans Public Schools have identified only 8% of their students as eligible for special education services. Comparable school districts throughout the country identify almost twice as many students with disabilities.

v. Jobs

Earning Disparities

According to the *HousingNOLA* report, individuals with disabilities earn 29% less than those without disabilities. <http://housingnola.com/main/uploads/File/HousingNOLAReport.pdf>

Hiring Discrimination

In a settlement reached on August 14, 2014, the U.S. Department of Justice and the Louisiana Supreme Court put an end to the Department’s three-year investigation into Louisiana’s alleged discriminatory treatment of lawyers and bar applicants with mental disabilities. DOJ charged that the court’s procedures for evaluating bar applicants unlawfully discriminated against those with psychiatric disabilities and, therefore, violated the ADA”. More specifically, the DOJ alleged that the court unfairly imposed onerous admissions prerequisites on applicants who revealed a mental health diagnosis. Some of these prerequisites included intrusive background investigations and conditional admission for applicants who had no history of committing misconduct or criminal activity. Under the settlement, the court’s character and fitness review of an applicant must now focus principally on the applicant’s past conduct rather than on the applicant’s condition. <https://lalegaethics.org/wp-content/uploads/2014-08-14-DOJ-LASC-ADA-Settlement-Agreement.pdf>

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

### HANO HCVP Administrative Plan details reasonable accommodation process

HANO strives to ensure that persons with disabilities have full access to HANO's programs and services. HANO may need to verify that a person requesting an accommodation is a qualified individual with a disability. HANO must also determine whether an accommodation is necessary in order to provide the individual with an equal opportunity to participate in the HCV program. A person who does not have a disability is not entitled to a reasonable accommodation.

HANO's reasonable accommodation request process works most effectively when requests are made in writing. However, if an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HANO will treat the information as a request for a reasonable accommodation, even if no formal, written request is made. HANO requires individuals to certify that they are a person with a disability, under the ADA or under the Fair Housing Act. Additional details and policies regarding reasonable accommodations are found in the HCVP Administrative Plan on pages 25 to 28. [http://www.hano.org/home/agency\\_plans/2016%20REVISED%20ADMIN%20PLAN.pdf](http://www.hano.org/home/agency_plans/2016%20REVISED%20ADMIN%20PLAN.pdf)

### HANO Admissions and Continued Occupancy – Public Housing Reasonable Accommodation

HANO policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so they may fully access and utilize the public housing program and related services.

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that accommodations address the need presented by the disability and they do not create an "undue financial and administrative burden" for HANO. An undue burden requires "significant difficulty or expense."

An applicant or resident may verbally request a reasonable accommodation. HANO and its Agents must consider the request without a provider designated form, but HANO or its agent will provide the applicant or the resident with the designated form to formalize the verification process.

A reliable, knowledgeable professional will verify all requests for accommodation or modification of a unit. Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability.

HANO or its agents will require verification from a knowledgeable professional when a request for a home visit recertification is submitted. HANO and its agents must comply with HUD/DOJ statement that provides instructions on verification of reasonable accommodations. Additional details can be found throughout HANO's Admissions and Continued Occupancy Policy. [http://www.hano.org/home/agency\\_plans/2016%20REVISED%20ACOP%20FINAL.pdf](http://www.hano.org/home/agency_plans/2016%20REVISED%20ACOP%20FINAL.pdf)

The chart below provides statistics on reasonable accommodation requests to HANO for the last two years.

<b>Reasonable Accommodation Requests</b>	<b>2015</b>	<b>2016</b>
	Feb. 4 – Dec. 31	Jan. 1 – Aug. 15
No. of requests received	156	166
No. of requests approved	125	148
No. of requests denied	11	16
No. of requests returned <i>(need additional info)</i>	20	2

City of New Orleans Reasonable Accommodation Process

It is the policy of the City of New Orleans, pursuant to the federal Fair Housing Amendments Act of 1988, the ADA, and applicable state laws, to provide individuals with disabilities reasonable accommodation in the City’s zoning and land use regulations, rules, policies, and practices to ensure equal access to housing and to facilitate the development of housing for individuals with disabilities. Reasonable accommodations in the zoning and land use context means providing individuals with disabilities or developers of housing for people with disabilities with flexibility in the application of land use, zoning, and building regulations, policies, practices and procedures. Reasonable accommodations include the waiver of certain requirements when it is necessary to eliminate barriers to equal housing opportunities. Additional details are codified in Article 27.5 of the Comprehensive Zoning Ordinance. [http://www.nola.gov/nola/media/One-Stop-Shop/CPC/OSS\\_BZA\\_APPLICATION-Reasonable-Accommodation.pdf](http://www.nola.gov/nola/media/One-Stop-Shop/CPC/OSS_BZA_APPLICATION-Reasonable-Accommodation.pdf)

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

In October 2015, the New Orleans City Council voted to reprogram uses of the Neighborhood Housing Improvement Fund. The fund is funded by a 30-year tax millage approved by New Orleans voters in 1991. The fund has been used to pay for the rehabilitation of existing homes for homeowners with disabilities so that they can remain in their homes in light of the difficulty that many persons with disabilities with fixed incomes have in making necessary repairs to ensure accessibility. <http://housingnola.com/main/uploads/File/HousingNOLAReport.pdf>

In addition, the table below demonstrates the difficulties that individuals with disabilities have in maintaining their homes and the difficulties that renters with disabilities face in becoming homeowners.

**5. Disproportionate Housing Needs**

- a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

The table below, which was included in HANO’s PHA Plan and above in the Disproportionate Housing Needs section of this AFH Plan, demonstrates the starkly disproportionate housing needs experienced by persons with disabilities who are low-income renters.

## Housing Problems among Households Including Persons with Disabilities - Orleans Parish

*(household member has at least one type of disability)*

	Hearing or Vision Impairment		Ambulatory Limitation		Cognitive Limitation		Self-Care or Independent Living Limitation	
	All	With Housing Problem(s)*	All	With Housing Problem(s)*	All	With Housing Problem(s)*	All	With Housing Problem(s)*
<b>RENTERS</b>	7,020	4,535	10,155	6,760	8,085	5,415	7,215	4,735
<b>HOMEOWNERS</b>	8,365	3,060	11,405	4,290	7,055	2,900	8,840	3,275
<b>TOTAL</b>	<b>15,385</b>	<b>7,595</b>	<b>21,560</b>	<b>11,050</b>	<b>15,140</b>	<b>8,315</b>	<b>16,055</b>	<b>8,010</b>

Source: HUD CHAS 2015 (using ACS 2008-2012 data).

Please note that an occupied unit may be reflected more than once in the statistical counts if a household member(s) has a disability in more than one of the following categories: hearing or vision impairment; ambulatory limitation; cognitive limitation; and/or self-care or independent living limitation.

\*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 unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.

\*\*This category includes renter occupied households (0-30% AMI) where cost burden was not computed and where a household has none of the other housing problems.

The permanent supportive housing vouchers have been successful in securing housing for persons with disabilities, but there are too few total vouchers to meet the demand, leaving many people with disabilities stuck on waiting lists and in nursing homes rather than living independently. <http://housingnola.com/main/uploads/File/HousingNOLAREport.pdf>

There is no complete count of accessible rental properties that are compliant with the Fair Housing Act, so it is difficult to gauge the full extent of unmet need for accessible housing within the city.

### 6. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

New Orleans and the region are still experiencing challenges related to disability and access. Several challenges are particularly noteworthy:

- A Jazzfest attendee claimed in a federal lawsuit that AEG Live and the New Orleans Jazz and Heritage Festival and Foundation have failed to appropriately respond to a December 2001 settlement that required the festival to become ADA compliant. That agreement, according to ADA.gov, required the festival to provide staff training for assisting people with disabilities, sign language interpreters, shuttles, accessible parking spaces, restrooms, permanent seating, craft and food booths, and crosswalks.

[http://www.nola.com/crime/index.ssf/2016/06/jazz\\_fest\\_ada\\_compliance\\_new\\_o.html](http://www.nola.com/crime/index.ssf/2016/06/jazz_fest_ada_compliance_new_o.html)

- A chance to ride New Orleans' historic streetcar along oak-lined St. Charles Avenue is something to look forward to, but that opportunity is not available to individuals who use wheelchairs. Three men with disabilities sued the city, the RTA, and its private manager, Transdev, over lack of access to the St. Charles Streetcar under both the ADA and the Rehabilitation Act in April 2016.  
[http://www.nola.com/politics/index.ssf/2016/04/new\\_orleans\\_st\\_charles\\_streetc.html](http://www.nola.com/politics/index.ssf/2016/04/new_orleans_st_charles_streetc.html)
- Three New Orleans residents sued the City in March 2016, alleging that its "bus system is inaccessible to persons with" mobility-related disabilities. The lawsuit comes after an internal review of the City's bus stops showed that roughly 94% of all bus stops in New Orleans are not compliant with the ADA.  
[http://www.nola.com/traffic/index.ssf/2016/03/new\\_orleans\\_faces\\_lawsuit\\_over.html](http://www.nola.com/traffic/index.ssf/2016/03/new_orleans_faces_lawsuit_over.html)

- b. The program participant may also describe other information relevant to its assessment of disability and access issues.

According to the VERA Institute, people with disabilities experience violence at much higher rates than people without disabilities. In 2013 alone, 1.3 million violent crimes were committed in the United States against people with disabilities. Yet, people with disabilities face significant barriers to reporting their victimization—their accounts are often dismissed or not taken seriously—as well as unequal access to social and medical services. This creates difficulties in accessing the judicial system. <https://www.vera.org/projects/equal-access-for-people-with-disabilities>

## 7. Disability and Access Issues Contributing Factors

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.*

- **Lack of affordable in-home or community based supportive services**  
As indicated by the *Olmstead* case against Louisiana Department of Health and Human Services, lack of affordable in-home or community based services contributes to segregation of persons with disabilities by leaving them few options other than segregated institutional living.  
[http://www.ndrn.org/images/Documents/Issues/Community\\_integration/Resources/NDRN\\_Litigation\\_Status\\_122704.pdf](http://www.ndrn.org/images/Documents/Issues/Community_integration/Resources/NDRN_Litigation_Status_122704.pdf)
- **Access to proficient schools for persons with disabilities**  
The chart on preceding pages demonstrates barriers to accessing proficient schools with most schools only partially accessible due to poor or missing sidewalks and curb ramps. In addition, according to the Southern Poverty Law Center, a number of students who have cognitive disabilities are being suspended at high rates from integrated school settings. The inability to access proficient schools contributes to segregation of children with disabilities.

- **Access to publicly supported housing for persons with disabilities & lack of affordable, accessible housing in range of unit sizes**

It appears that the City needs far more affordable, accessible units. Publicly supported housing as of 2016 is serving 6,934 households; however, individuals with ambulatory disabilities alone is 26,013. Without accessible, affordable housing, persons with disabilities often have to opt to live in segregated settings for individuals with disabilities only.

A public hearing comment from an Advocacy Center representative indicated that contractor fraud is still affecting residents living with disabilities. In addition, a resident said that HANO does have a limited amount of vouchers to assist with rent for people living with disabilities.

- **Access to transportation for persons with disabilities**

Persons with disabilities are somewhat concentrated in downtown areas; however, persons with disabilities who live outside of downtown areas experience barriers to transportation due to a 60 to 100% decrease in public transportation services into the Central Business District from certain neighborhoods. (P. 14, <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>). In addition, most taxis do not have wheelchair accessible vehicles, and the St. Charles Street car is not wheelchair accessible.

Many residents at the first Public Hearing expressed dissatisfaction with the RTA in New Orleans, saying there are not enough curb cuts for people living with disabilities to gain access to public transit.

- **Inaccessible government facilities or services**

As discussed earlier, the City and other local governments in the region have entered into settlement agreements regarding the accessibility of government facilities and services. For example, Jefferson Parish entered into an agreement to ensure that polling places were accessible, and the City of New Orleans had to modify government buildings to ensure that they were ADA accessible. When government facilities and services are not in compliance with ADA rules, individuals with disabilities undergo disparities in their ability to access government and participate in the civic process.

- **Inaccessible sidewalks, pedestrian crossings, or other infrastructure**

Above charts show the number of inaccessible sidewalks, pedestrian crossings, and other infrastructure at schools. Also, New Orleans has only one APS signal to assist the persons with visual disabilities in crossing the street. When City and regional infrastructure are not in compliance with ADA rules, individuals with disabilities undergo disparities in their ability to access needed services.

At the first Public Hearing, residents made comments about sidewalks in disrepair and infrastructure.

- **Land use and zoning laws**

Land use and zoning laws have been a barrier to individuals with disabilities finding affordable housing. The City of New Orleans has at times voted to reject a project or change zoning based on resident input that opposes affordable housing for persons with disabilities.

The following case regarding the property at 2535 Esplanade illustrates this contributing factor.

On August 6, 2012, the United States brought a case against the City and the Louisiana State Bond Commission (Bond Commission) to enforce the Fair Housing Act and the Americans with Disabilities Act (ADA). The United States alleged that the City and the Bond Commission engaged in a pattern or practice of discrimination against persons with disabilities by taking a series of actions designed to block the Gulf Coast Housing Partnership (GCHP) and its non-profit partners from converting an abandoned nursing home into a 40-unit affordable housing development known as the “Esplanade.” Half the units of the Esplanade were intended to be generally available to low-income households, and half were intended as “permanent supportive housing” for homeless persons with mental and physical disabilities, including homeless veterans and emancipated youth. The United States also alleged that the City, through its Board of Zoning Adjustments and its Historic District Landmarks Commission, discriminated by denying variance requests and a demolition permit necessary for the development of the Esplanade. In addition, the United States alleged that the City, through its Department of Safety and Permits, reclassified the Esplanade property so that GCHP’s proposed use was no longer a permitted use in a district that allowed for multifamily housing. The United States alleged that the City undertook these and other actions in response to widespread community opposition to the Esplanade that was based on fear and stereotypes of its prospective residents with disabilities. The City entered into a settlement agreement with the United States, which allowed building of affordable housing at the location.

[https://www.justice.gov/sites/default/files/crt/legacy/2014/05/22/new\\_orleanssettle.pdf](https://www.justice.gov/sites/default/files/crt/legacy/2014/05/22/new_orleanssettle.pdf)

Because of restrictions regarding land use and zoning, individuals with disabilities can be left with few options other than segregated institutional living, which contributes to segregation.

- **Location of accessible housing**

The following excerpt from a Times Picayune article discusses how the location of accessible housing was challenged based on neighbor concerns.

“The Muses apartment generated some division between neighborhoods on either side of St. Charles Avenue. Central City residents, merchants and church leaders said it would restore badly needed affordable housing to the neighborhood, while a number of Coliseum Square residents criticized both its design and its density. The development included 211 apartments in the first phase, roughly 65 percent of which will rent at market rates, with the remainder set aside as affordable housing. The City Planning Commission voted against the project in the face of such criticism, but the City Council later gave its approval after the developers reduced the number of apartments and otherwise tweaked the design.”

[http://blog.nola.com/tpmoney/2009/06/new\\_apartment\\_project\\_taking\\_s.html](http://blog.nola.com/tpmoney/2009/06/new_apartment_project_taking_s.html)

Because affordable housing is often in concentrated areas of poverty due to land value, availability, restrictive zoning and land use policies, and community opposition in low poverty areas, individuals with disabilities can be left with few options other than segregated institutional living.

**E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Caused but Unresolved:

**GNOFHAC vs. Jefferson Parish**

On June 11, 2013, Jefferson Parish entered into a conciliation agreement with HUD and GNOFHAC to address a caused complaint by GNOFHAC that Jefferson Parish failed to fulfill its obligation to affirmatively further fair housing. The relief set out in the settlement agreement called for a new Analysis of Impediments, which was finally completed in 2016, and for the introduction of a fair housing ordinance to the Parish Council. The Parish Council has not yet considered any local housing anti-discrimination ordinances.

Cases Pending with HUD:

GNOFHAC currently has 16 cases pending with HUD against private entities in New Orleans. An additional six cases are pending in suburban parishes. The most common basis of discrimination for the New Orleans complaints was disability (7), followed by familial status (5), race (3), and sex (1).

GNOFHAC is also party to complaints, along with multiple other fair housing centers and the National Fair Housing Alliance, against Fannie Mae, U.S. Bank, Bank of America, and Deutsche Bank for failing to maintain their real estate owned properties in neighborhoods of color in New Orleans and Baton Rouge.

There are two pending cases against public entities in New Orleans. *Cambridge Court LLC vs. City of New Orleans* was filed in 2013 and alleges that the down-zoning of the overwhelmingly White Lakeview neighborhood had a disparate impact on protected classes. The restriction on multi-family housing was passed after a slight increase in Lakeview's minority population Post-Katrina. Post-Katrina, the African-American population grew from .7% to 3.4%. Similarly, the Latino population in Lakeview increased from 3.7% to 6%. Racial animus against the growing New Orleans Latino communities was well documented during the City's rebuilding efforts. In addition, public opposition to recent attempts by landowners to rebuild their pre-Katrina duplexes in Lakeview reflects racial bias.

GNOFHAC also has a pending case against HANO on behalf of an HCVP client who was denied access to a unit after the landlord found out the tenant had a son with a disability. The son has subsequently passed away, but the client's case remains unresolved.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Louisiana Equal Housing Opportunity Act is certified by HUD as substantially equivalent to the federal Fair Housing Act. Like its federal equivalent, the statute protects individuals in seven protected classes. The Louisiana Attorney General's office is the only Fair Housing Assistance Program funded agency in the state.

Though not a part of Louisiana Equal Housing Opportunity Act, the state did pass housing protections for victims of domestic violence in 2015. The Louisiana Violence Against Women Act (LaVAWA) provide four key protections:

- Anyone in need of emergency assistance can contact the police without penalty.
- Victims of domestic violence can no longer be evicted because of the violence of an abuser.
- Survivors can no longer be denied housing solely on the basis of past abuse.
- Survivors can now terminate a lease early and move when necessary to ensure their safety.

The City of New Orleans has its own non-discrimination laws that extend additional protections in housing to individuals based on the following characteristics: age, creed, gender identification, marital status, and sexual orientation. The New Orleans Human Relations Commission is the municipal agency charged with enforcing the City's Human Relations Rights laws. The Commission accepts complaints from all New Orleans residents and visitors.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

GNOFHAC provides fair housing enforcement, education and outreach, policy advocacy, and homeownership protection throughout the state of Louisiana and is based in New Orleans.

GNOFHAC enforcement staff conducts fair housing investigations and provide legal representation to individuals who experience housing discrimination. GNOFHAC enforcement staff also routinely conducts testing of the greater New Orleans housing market in order to understand discriminatory trends and identify systemic discrimination. The organization regularly files enforcement actions against individuals and entities engaging in discriminatory practices. Since Hurricane Katrina, GNOFHAC has served more than 1,000 individuals and assisted in the recovery of \$5.43 million in monetary relief as a result of its enforcement actions. GNOFHAC has also negotiated numerous settlements and consent decrees requiring housing providers or local government entities to comply with fair housing laws.

GNOFHAC trains over a thousand people each year about their fair housing rights and obligations through first time homebuyer classes, the annual Fit for a King conference, and talks with students, neighborhood associations, local officials, housing providers, and volunteers. The Center has conducted numerous statewide and local media campaigns to inform consumers and housing professionals of their fair housing rights and responsibilities. GNOFHAC has also produced an original children's book, *The Fair Housing Five & the Haunted House*, which is used across the country to teach about fair housing and civil rights.

In addition to GNOFHAC, Southeast Louisiana Legal Services (SLLS) also provides some fair housing assistance to clients in the New Orleans regions. SLLS is the state's largest provider of

free civil legal aid to low-income people and operates a housing division which primarily focuses on landlord-tenant law but occasionally does fair housing work as well.

The Advocacy Center, a statewide non-profit that advocates for the human and legal rights of people with disabilities and seniors also assists with fair housing education and enforcement as it relates to persons with disabilities in the New Orleans area.

#### 4. **Additional Information**

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The City's new updated Comprehensive Zoning Ordinance includes a new reasonable accommodations provision that provide a clear written procedure for individuals with disabilities and developers of housing for people with disabilities to follow when requesting zoning and land use accommodations. The City must accept and process reasonable accommodation requests that are made outside of this process, as well.

Earlier this year, HANO also revised its criminal background screening procedures. The new policy considers convictions rather than arrests and does not bar anyone categorically, except where mandated by federal law.

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

#### 5. **Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.*

- Lack of local private fair housing outreach and enforcement:

The three agencies listed above provide local private fair housing outreach and enforcement.

- Lack of local public fair housing enforcement:

The City of New Orleans Human Relations Commission is empowered to investigate and adjudicate discrimination complaints in employment, public accommodations, and housing, but has not yet examined a fair housing case.

The Louisiana Department of Justice (LA DOJ) has adopted a standard of interpreting the Fair Housing Act that is inconsistent with federal law. The LA DOJ's standard requires that a respondent violate multiple, separate provisions of the Fair Housing Act in order for a case to be "caused." Under federal law, each of those provisions would be a separate

violation of the law, and a respondent need only violate one for HUD to find reasonable cause. The LA DOJ has not prosecuted a fair housing case and rarely completes investigations within the 100 day timeline required by law.

- Lack of resources for fair housing agencies and organizations:

GNOFHAC provides significant fair housing outreach and enforcement resources, but is underfunded relative to the need. The organization responds to complaints and conducts outreach statewide, and therefore has fewer resources dedicated exclusively to New Orleans.

- Lack of state or local fair housing laws:

Neither Louisiana nor New Orleans have source of income protections that would protect HCVP participants and other residents who receive assistance from housing discrimination. A 2009 GNOFHAC report examined 100 rental properties in the New Orleans area and found widespread discrimination against voucher holders. The HCVP program is currently 98% African-American.

- Unresolved violations of fair housing or civil rights law
- Other

**VI. Fair Housing Goals and Priorities**

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

<b>Identifying and Prioritizing Contributing Factors to R/ECAP Areas</b>		
<b><u>Fair Housing Issues</u></b>	<b><u>Contributing Factors</u></b>	<b><u>Prioritization and Justification</u></b>
<b>R/ECAPs</b>	<b>Displacement of residents due to economic pressures:</b> Property values have increased by almost 50% in some neighborhoods that have had targeted community revitalization, had little to no flooding, and that are close to the Central Business District. These gentrifying neighborhoods are Tremé, Marigny, Bywater, and the St. Roch area of the 7 <sup>th</sup> ward. This has made it difficult for many long-time, predominantly African-American residents to remain in their neighborhoods and for other low income people of color to locate in those neighborhoods because of high rents, manipulative evictions, uninhabitable housing conditions increased real estate taxes, and high asking prices for homes. These residents often relocate in areas of concentrated poverty with less access to opportunity such as New Orleans East.	<b>High</b> - Low income, predominantly African-American renters and those seeking to buy homes have had to move out of neighborhoods where access to opportunity is increasing because the private market in those areas has combined with the high demand for housing to reduce the amount of affordable housing which is a major factor in creating and perpetuating R/ECAPs.
	<b>Land use and zoning laws:</b> Land-use and zoning laws make it more difficult for low-income people of color to obtain quality housing in their neighborhoods of choice when density restrictions and aesthetically oriented design standards make affordable housing infeasible in certain neighborhoods. Additionally, regulations allowing dwelling use for short term rentals encourage evictions and rising rents for low-income people of color.	<b>High</b> – There are limited areas of public land on which to site affordable housing, particularly in high opportunity areas; therefore, it is highly important that zoning laws assist private development of affordable housing to address the overwhelming need.
	<b>Location and type of affordable housing:</b> Challenges exist regarding the location and type of affordable housing available in areas not designated as R/ECAPs. Rentals in high opportunity and gentrifying neighborhoods are being converted to single family homes to be sold, not rented as affordable. This causes a reduction in affordable rentals in high opportunity and gentrifying neighborhoods which forces African-Americans and Latinos to seek rentals in concentrated areas of poverty where affordable rentals is more prevalent.	<b>High</b> – This appears to be a main factor in creating R/ECAPs as landlords in gentrifying areas near job centers and transportation hubs are converting rental properties into owner-occupied homes for high income residents and pushing low income, predominantly African-American residents toward areas of concentrated poverty where rent is affordable.

R/ECAPs	<p><b>Deteriorated and abandoned properties:</b> The City of New Orleans estimates that there are about 28,000 blighted properties in the City but neighborhoods in R/ECAP areas had a disproportionate share of blighted properties. Blighted adversely affect the ability of low-income, predominantly African-American residents of R/ECAPs to gain income. For example, deteriorated and abandoned structures increase concentrated poverty because the adverse health effects that they have on residents may make residents more likely to miss work and experience less job stability thereby reducing incomes below the poverty line. They may also adversely affect students' ability to learn, likewise harming earnings potential down the line. The lack of community revitalization strategies results in fewer job opportunities within the neighborhood that would also help lift residents out of poverty.</p>	<p><b>Medium</b> - High income households do not settle in R/ECAP areas because of the lack of revitalization, and often low income households experience decreased economic mobility because of exposure to deteriorated housing, which plays a moderately significant role in creating R/ECAPs.</p>
	<p><b>Lack of community revitalization strategies:</b> Some of the R/ECAP areas have little community revitalization activity taking place which does not attract a diverse representation of residents across the income spectrum. Although areas like New Orleans East, the 9<sup>th</sup> Ward, Hollygrove/Dixon, Gert Town, and BW Cooper are listed as placed based areas (PBA) by the City of New Orleans, they have not seen the level of revitalization strategies that have been placed on other placed based areas like Tremé, Mid-City, 7<sup>th</sup> Ward/St. Roch, and Central City. The PBAs that received more dollars dedicated to renovating NORDC centers, roads, schools, business facades are now considered gentrifying neighborhoods. The PBAs that did not receive this level of funding continued to be categorized as R/ECAP areas.</p>	<p><b>Medium</b> – High income households do not settle in R/ECAP areas because of the lack of revitalization which makes that factor a medium priority for addressing R/ECAPs. Additionally, low-income residents experience diminished economic mobility out of poverty because of the lack of community revitalization strategies.</p>
	<p><b>Lack of regional cooperation:</b> To date, the RTA and the City of New Orleans have not been able to provide extensive public transportation linkages to surrounding parishes in the metro area, which hinders the ability of transit-dependent residents, who are disproportionately African-American, to access good jobs and other key amenities in high opportunity areas.</p>	<p><b>Medium</b> – Low income African-American, Latino, and Asian households in neighborhoods that lack public transportation are not able to move to high opportunity neighborhoods in other jurisdictions within the region because of limited transportation linkages between those communities and job centers in New Orleans.</p>
R/ECAPs	<p><b>Lack of private investments in specific neighborhoods:</b> Some of the R/ECAPs such as the Lower Ninth Ward and New Orleans East have been facing challenges due to limited private investments in general services such as health care, grocery stores, retail outlets, and restaurants.</p>	<p><b>Medium</b> – Because certain neighborhoods lack grocery stores, medical facilities, and other quality of life amenities, higher income residents, who are disproportionately White in New Orleans, are unlikely to reside in these areas, maintaining the segregation patterns that are the hallmarks of R/ECAPs. Additionally, lack of access to these types of amenities may reduce access to employment for residents of R/ECAPs, exacerbate adverse health conditions that limit economic mobility, and cause individuals to spend more of their income on</p>

<b>R/ECAPs</b>		certain expenses, such as food and transportation, than they would if, for example, grocery stores were present in R/ECAPs.
	<p><b>Private Discrimination:</b> At the public hearings, residents expressed that renters do not always have knowledge of their rights. As a result, when they experience private discrimination, they are deterred from moving outside of R/ECAPs. Fair housing testing results from GNOFHAC have consistently revealed high levels of discrimination on the basis of race and national origin in New Orleans and in the broader region. Landlords, sellers, real estate agents and lenders are also unaware of their obligations under fair housing laws, and of the legal consequences</p>	<p><b>High</b> - Discrimination appears to be a primary factor in low-income renters not being able to locate in high opportunity neighborhoods, reinforcing the existence of R/ECAPs.</p>
	<p><b>Impediments to mobility:</b></p> <ul style="list-style-type: none"> <li>• Using a metro-wide Fair Market Rent as a base for HCVP payment standards does not allow HCV tenants the ability to reach higher-rent high opportunity neighborhoods.</li> <li>• HCVP households do not have access to a robust mobility counseling program that includes pre-move counseling, housing search assistance—including tours of different neighborhoods—an orientation to the new neighborhood, and post-move support.</li> <li>• A number of landlords are unaware of how to become a landlord with the HCV program. Voucher holders experience discrimination from landlords who do not want to rent to HCV participants.</li> </ul>	<p><b>High</b> – Additional HCV landlords in high opportunity areas would increase voucher holders’ access to high opportunity areas and increase the ability of HCV voucher holders to relocate from R/ECAP areas. Access to mobility counseling could play a role in increasing mobility from R/ECAP areas.</p>
	<p><b>Lack of public investments in specific neighborhoods, including services or amenities:</b> A number of R/ECAP areas lack public investments. As a result, low-income people of color in R/ECAPs experienced diminished economic mobility out of poverty, and R/ECAP areas fail to attract high income residents. Residents living in R/ECAP areas have expressed concern that the City’s budget priorities are not consistent with deconcentrating poverty as more funds go towards building jails than improving neighborhoods. Residents also expressed concern that HANO’s slow turnaround of public housing developments contributes to the concentration of low income, predominantly African households in areas of poverty while waiting to return to public housing. R/ECAP areas lacking significant public investment are the Upper 9th Ward area, New Orleans East, St. Bernard area, 7th Ward, Gert, BW Cooper/Marrero Commons area, Tulane/Gravier, Leonidas area, and the Fischer/Tall Timbers area.</p>	<p><b>Low</b> – Disparities in public investments are not a major factor in creating R/ECAPs as many majority white, high opportunity neighborhoods also have major needs for street repair, flood reduction, and other infrastructure needs, which have not deterred households from locating in these areas. However, in light of historical disparities in levels of public investment in communities by race, there is a need to strategically focus public investments in communities of color, which are often R/ECAPs, in order to remedy the effects of that past discrimination.</p>
	<p><b>Community Opposition:</b> Because opposition to affordable housing development often comes from those who have a disproportionate amount of political influence, the opposition leads to developers withdrawing projects in high opportunity neighborhoods and placing them in areas of concentrated poverty where neighborhood residents are less likely to be able to influence land use planning processes. Opposition to broad legislative changes to zoning that would allow diverse housing types in all neighborhoods contributes to R/ECAPs. In addition, some types of zoning, particularly for planned developments and conditional</p>	<p><b>Medium</b> – Community opposition affects development if certain zoning laws that allowed diverse types of housing in all neighborhoods had some mandatory language that does not take into account discretion and community opposition.</p>

R/ECAPs	zoning have discretion as a part of the approval process which creates disparities in types of developments allowed in certain neighborhoods.	
	<b>Occupancy codes and restrictions:</b> Residents expressed concern that the conversion of duplex housing into single-family housing in high opportunity neighborhoods reduces the availability of affordable housing and that zoning laws do not address this trend. This contributes to low income renters having to move from high opportunity neighborhoods to neighborhoods with concentrated poverty.	<b>Low</b> – The prevalence of duplexes being converted to single family homes is a factor in decrease affordable rentals but it is not so prevalent to be a main factor contributing to R/ECAPs.
	<b>Public Housing redevelopment:</b> Input provided at the public hearings expressed concern about publicly supported housing spurring re-concentration of poverty in farther flung neighborhoods.	<b>Low</b> –While HUD monitors publicly supported housing to ensure poverty deconcentration, additional community consultation and oversight will help to address this challenge.

### Identifying and Prioritizing Contributing Factors to Segregation

<u>Fair Housing Issues</u>	<u>Contributing Factors</u>	<u>Prioritization and Justification</u>
Segregation	<b>Location and type of affordable housing:</b> Segregation patterns may continue in neighborhoods that have houses that are unaffordable for low-income minorities to purchase or rent Ongoing discrimination in mortgage lending and property insurance further restricts homeownership for low income people of color. HUD maps reveal areas of white population concentration with virtually no affordable housing. The overwhelming majority of subsidized housing opportunities—whether HCVP, project-based voucher, public housing, LIHTC, or soft-second mortgages —are available in lower-income, majority African-American neighborhoods.	<b>High</b> – When public housing was decreased and HCV programs increased due to federal funding, low income voucher holders were limited to certain areas of the City where their voucher could cover rent which resulted in a number of HCV renters being located in certain sections of the City.
	<b>Displacement of residents due to economic pressures:</b> Gentrification of neighborhoods often leads to displacement of people of color, as neighborhoods attract new residents interested in purchasing and rehabilitating properties. This may cause a rise in property values, increasing the rent for low-income residents, who are disproportionately African-American, as well as create situations where homeowners may not be able to afford to continue living in their neighborhood due to increased property taxes. Lack of renter protections that would limit rent increases and eviction prevent low income residents of color from remaining in neighborhoods that are gentrifying.	<b>High</b> - Low income renters and those seeking to buy homes within the private market have found affordable housing only in certain areas of the City which is a major factor in creating segregation as the majority of low income households are people of color.

<b>Segregation</b>	<p><b>Land-use and Zoning laws:</b> In New Orleans current Comprehensive Zoning Ordinance (CZO), some neighborhoods are designated as “suburban neighborhoods residential districts” with codes S-RM1, S-RM2, S-LRM1, AND S-LRM2. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. The list of neighborhoods that are designated in the CZO are the same areas that are segregated with a majority white population according to HUD Maps displaying race.</p>	<p><b>Medium</b> – There are limited areas of public land on which to site affordable housing, particularly in high opportunity areas; therefore, it is highly important that zoning laws assist private development of affordable housing to address the overwhelming need.</p>
	<p><b>Lack of private investments in specific neighborhoods:</b> A few of New Orleans’ PBAs need more private investments. Specifically, PBAs such as Gert Town, Hollygrove, New Orleans East and parts of the Upper-Ninth Ward have challenges due to the lack of private investments.</p>	<p><b>Medium</b> – Because certain neighborhoods lack grocery stores, medical facilities, ample greenspace, and other quality of life amenities, high income residents who are majority white in New Orleans are unlikely to reside in these areas which is a secondary factor in segregation.</p>
	<p><b>Private discrimination:</b> GNOFHAC's 2015 report "Where Opportunity Knocks, The Doors are Locked," revealed that nearly half of African-American prospective renters experience housing discrimination when seeking housing in high opportunity neighborhoods.</p>	<p><b>High</b> – Discrimination appears to be a primary factor in African-American renters being able to locate in high opportunity neighborhoods creating segregation.</p>
<b>Segregation</b>	<p><b>Impediments to mobility:</b></p> <ul style="list-style-type: none"> <li>• Using a metro-wide Fair Market Rent as a base for HCVP payment standards does not allow HCV tenants the ability to reach higher-rent high opportunity neighborhoods.</li> <li>• HCVP households do not have access to a robust mobility counseling program that includes pre-move counseling, housing search assistance—including tours of different neighborhoods—an orientation to the new neighborhood, and post-move support.</li> <li>• A number of landlords are unaware of how to become a landlord with the HCV program.</li> <li>• Voucher holders experience discrimination from landlords who do not want to rent to HCV participants.</li> </ul>	<p><b>High</b> – Additional HCV landlords in high opportunity areas would increase voucher holders’ access to high opportunity areas and increase the ability of HCV voucher holders to relocate from R/ECAP areas. Access to mobility counseling could play a role in increasing mobility from R/ECAP areas.</p>
	<p><b>Community Opposition:</b> Because opposition to affordable housing development often comes from those who have a disproportionate amount of political influence, the opposition leads to developers withdrawing projects in high opportunity neighborhoods and placing them in areas of concentrated poverty where neighborhood residents are less likely to be able to influence land use planning processes. Opposition to broad legislative changes to zoning that would allow diverse housing types in all neighborhoods contributes to R/ECAPs. In addition, some types of zoning, particularly for planned developments and conditional zoning have discretion as a part of the approval process which creates disparities in types of developments allowed in certain neighborhoods.</p>	<p><b>Medium</b> – Community opposition affects development if certain zoning laws that allowed diverse types of housing in all neighborhoods had some mandatory language that does not take into account discretion and community opposition.</p>

<b>Segregation</b>	<b>Lack of regional cooperation:</b> Following Hurricane Katrina, the lack of regional cooperation contributed to segregation and adversely impacted affordable housing development.	<b>Medium</b> – A number of regions surrounding Orleans Parish attempted to prevent affordable multifamily housing. While these attempts were thwarted, exclusionary zoning in area suburbs continues to exert a significant impact on segregation in Orleans Parish because eventual zoning changes in those areas were site-specific rather than systemic.
	<b>Lending Discrimination:</b> From a review of the Home Mortgage Disclosure Act (HMDA) data for the 2015 year provided by the Consumer Financial Protection Bureau, it is clear that disparities exist in access to financial services. From the HMDA data, it was found that African-Americans originated 3,096 mortgages, but 2,669 were denied which is an 86% denial rate. Individuals that were identified as white originated 15,678 mortgages and 4,304 were denied which is only a 27% denial rate. The Asian population originated 421 mortgages and 162 were denied which is a denial rate of 38%. The Latino population originated 956 mortgages in the metro region but 476 were denied which is 50%.	<b>High</b> – Denying 86% of African-American loans and 50% of Latino loans in the New Orleans metro region is a significant factor in the inability of these populations to finance housing in desegregated areas.
<b>Segregation of Persons with Disabilities</b>	<b>Lack of affordable in-home or community based supportive services:</b> As indicated by the Olmstead case against Louisiana Department of Health and Human Services, the lack of affordable in-home or community based services contributes to the segregation of persons with disabilities by leaving them few options other than segregated institutional living.	<b>Low</b> –Segregated institutional living in Louisiana has been litigated with the last major case being in 2010. However, with this case, according to the Louisiana Developmental Disabilities Council, a number of solutions are being implemented to prevent segregated institutional living for individuals with disabilities.
<b>Identifying and Prioritizing Contributing Factors for Disparities in Access to Opportunity</b>		
<b><u>Fair Housing Issues</u></b>	<b><u>Contributing Factors</u></b>	<b><u>Prioritization and Justification</u></b>
<b>DISPARITIES IN ACCESS TO OPPORTUNITY</b>	<b>Location of proficient schools and school assignment policies</b> As a result of historic patterns of residential racial segregation, many African-American students live in zones with few high quality schools, while many white students live in zones with A or B rated schools. Seven of the highest ranked public schools in New Orleans do not participate in the citywide application system used by most public schools. The application and enrollment processes for these schools are demanding on parents’ schedules and require access to transportation. These	<b>High</b> –The City’s study and other national studies have shown a direct link between educational attainment and access to other opportunities. Many in protected classes have not had opportunities to further their education and have been subjected to failing schools. This

<b>DISPARITIES IN ACCESS TO OPPORTUNITY</b>	<p>schools often expect parents to deliver parts of the application during school hours and also require parent meetings and student exams for entry. The majority of public schools lack LEP services and a number do not have sufficient special education services. When reviewing the HUD race/ethnicity map in conjunction with the maps showing the location of proficient schools, the maps show that the majority of Latino and Asian residents do not live near proficient schools.</p> <p><b>Access to proficient schools for persons with disabilities:</b> The chart in preceding pages demonstrate barriers to accessing proficient schools with most schools only partially accessible due to poor or missing sidewalks and curb ramps. In addition, according to the Southern Poverty Law Center, a disproportionate number of students who have cognitive disabilities are being suspended at high rates from integrated school settings.</p>	<p>is a major factor in their ability to access other opportunities.</p>
	<p><b>Lack of employment opportunities:</b> The City of New Orleans developed and conducted a survey to provide a detailed illustration of the assets and challenges of African-American males in gaining access to employment opportunities. The report found that education levels, criminal history, lack of transportation, housing, and family life were obstacles to employment.</p>	<p><b>High</b> – The earning potential of residents has a direct correlation to and major impact on the ability to access opportunities.</p>
	<p><b>Access to financial services:</b> Anecdotal information from community members indicates that the ability to secure loans for homes and businesses is one of the reasons that they are unable to locate in low poverty areas or have better transportation options.</p>	<p><b>Medium</b> – Evidence supports that access to financial services has been somewhat of an obstacle to those within protected classes which hinders their ability to purchase homes and cars, utilize credit, and start businesses.</p>
	<p><b>The availability, type, frequency, and reliability of public transportation:</b> New Orleans residents have experienced a 55% decline in available transit service since Hurricane Katrina which lowers the accessibility to affordable transportation for families that may not have the means to own a personal vehicle.</p> <p><b>Access to transportation for persons with disabilities:</b> In addition, most taxis do not have wheelchair accessible vehicles and the St. Charles Street car is not wheelchair accessible.</p>	<p><b>Medium</b> – Access to transportation affects the ability to obtain jobs, relocate to areas of high opportunity, and access other services like health care and schools and plays a role in disparities in access to opportunity.</p>
	<p><b>Lack of regional cooperation:</b> This topic drew comments due to the lack of regional transportation. Participants cited the difficulty in traveling across the region on public transit and from job centers: “Jobs that are close to home don’t pay that much,” was a comment made at the public hearing held on July 19, 2016, as part of the HUD Affirmatively Furthering Fair Housing (AFFH) process.</p>	<p><b>Medium</b> – Access to transportation affects the ability to obtain jobs, relocate to areas of high opportunity, and access other services like health care and schools and plays a role in disparities in access to opportunity.</p>

<b>DISPARITIES IN ACCESS TO OPPORTUNITY</b>	<p><b>Location of environmental health hazards:</b> A theme that has been identified in reviewing R/ECAP and segregated areas is that a majority of these areas have been adversely impacted by elevated expressways where residents are subjected to noise pollution, lack of greenspace, and pollutants from vehicle traffic. In addition, R/ECAP and segregated areas have been located near or on landfill and waste sites.</p>	<p><b>Medium</b> – In Orleans Parish and nationwide, studies articulate how expressways have destroyed neighborhoods and businesses, creating R/ECAPs and segregation. Accordingly, the location of environmental health hazards has a role in disparities.</p>
	<p><b>Location of employers:</b> At the first public hearing, some residents highlighted challenges accessing jobs in New Orleans. In addition, many jobs in New Orleans are temporary and not sustainable. High quality jobs outside of New Orleans are difficult to access due to the lack of regional transportation.</p>	<p><b>Medium</b> – Jobs are primarily in the Central Business District of New Orleans and in the Jefferson Parish regions. This factor is rated medium. Increasing access to public transportation and developing job centers outside of the CBD and certain Jefferson Parish areas can assist in overcoming disparities in access to opportunity.</p>
	<p><b>Lack of access to Healthcare</b> Large disparities in health exist between different groups of people in New Orleans. A report developed by the New Orleans Health Department in 2010 examined racial health disparities between African-Americans and whites during the period of 2008-2010. The report found the following disparities:</p> <ul style="list-style-type: none"> <li>• African-Americans in New Orleans were 1.37 times more likely to die than whites in New Orleans over the period of 2008-2010. This ratio was higher in New Orleans over this period than in Louisiana and the United States as a whole, which means that New Orleans has a more severe disparity in all-cause mortality between whites and African-Americans than both the state and the nation.</li> <li>• African-Americans were eight times more likely to die of homicide than whites in Orleans Parish during this period.</li> <li>• African-Americans were three times more likely to die of diabetes and twice as likely to die of kidney disease and HIV.</li> <li>• African-American children under 18 in New Orleans are about three and a half times more likely to be uninsured than white children.</li> </ul>	<p><b>High</b> - There is a 25.5 year difference between the ZIP codes in New Orleans with the highest and lowest life expectancies according to the Joint Center for Political and Economic Studies' Place Matters Project ZIP code 70112, containing parts of the Tulane, Gravier, Iberville and Tremé neighborhoods, had a life expectancy of 54.5 years. This is lower than the Democratic Republic of the Congo. ZIP code 70124, containing the Lakeshore, Lake Vista, Lakeview, West End, Lakewood and Navarre neighborhoods had a life expectancy of 80, similar to the UK and higher than the US average in 2012. Disparities in healthcare has a significant impact on access to opportunity.</p>
	<p><b>Inaccessible government facilities or services:</b> The City of New Orleans and Jefferson Parish have both have entered into settlement agreements regarding inaccessible government facilities and services. Jefferson Parish entered into an agreement to ensure that polling places were accessible and the City of New Orleans had to modify government buildings to ensure that they were ADA accessible. When government facilities and services are not in compliance with ADA rules,</p>	<p><b>Low:</b> Individuals with disabilities undergo disparities in their ability to access government and participate in the civic process;</p>

	individuals with disabilities face barriers in accessing government services and participating in the civic process.	
	<b>Inaccessible sidewalks, pedestrian crossings, or other infrastructure:</b> Not until March 2016 did New Orleans install the first Accessible Pedestrian Signal (APA) located at McAlister crosswalks at the Tulane University campus. It is an audible beeping that helps visually impaired people know when it is safe to cross the road. This is the only APS in the City. In addition, the majority of schools have documented that sidewalks and curb ramps are poor or missing. Sidewalks in New Orleans remain in a state of disrepair. Cracks are present on the majority of sidewalks, making movement in a wheelchair uneven and bumpy. The roots of trees upend sidewalks, making the traverse quite difficult at times. Some sidewalks are not equipped with curb cuts, making them inaccessible to the independent wheeler.	<b>Low:</b> When City and regional infrastructure are not in compliance with ADA rules, individuals with disabilities face barriers in accessing needed services like jobs, healthcare, and housing. Although this is not a high factor because the poor conditions of roads and sidewalks occur in all neighborhoods in New Orleans, with some of the worst conditions in high opportunity neighborhoods, it is noted as a factor in disparities in opportunity.

**Identifying and Prioritizing Contributing Factors for Disproportionate Housing Needs/Publicly Supported Housing**

<u>Fair Housing Issues</u>	<u>Contributing Factors</u>	<u>Prioritization and Justification</u>
<b>Disproportionate Housing Needs</b>	<p><b>The availability of affordable units in a range of sizes</b> New Orleans has growing challenges related to the lack of affordable housing and how it is a contributing factor to disproportionate housing needs. Data shows a number of areas where residents are paying 50% or more of median income for housing. The breakdown of low income households is as follows:</p> <ul style="list-style-type: none"> <li>• Extremely Low Income renter households (&lt;=30% AMI) = 23,510</li> <li>• Very Low Income renter households (&gt;30% but &lt;=50% AMI) = 12,930</li> <li>• Low Income renter households (&gt;50% but &lt;=80% AMI) = 13,055</li> </ul> <p>The total low income households is 49,500. Of all 49,500 "Low income" Renter Households, 37,130 or 75% are Cost Burdened (24% Moderate and 51% Severe) and 38,025 or 77% have Housing Problems</p>	<p><b>High</b> – When the majority African-American areas of the City show that 1 bedroom renters pay more than 50% of median income and the majority of 2 bedroom renters pay more than 40% of their income to rent, this shows that the availability of affordable units in a range of sizes is a major factor in disproportionate housing needs for African-Americans.</p>
	<p><b>Displacement of residents due to economic pressures:</b> Gentrification of neighborhoods often leads to displacement of people of color, as neighborhoods attract new residents interested in purchasing and rehabilitating properties. This may cause a rise in property values, increasing the rent for low-income residents, who are disproportionately African-American, as well as create situations where homeowners</p>	<p><b>High</b> - Low income renters and those seeking to buy homes within the private market have found affordable housing only in certain areas of the City which is a major factor in creating</p>

<b>Disproportionate Housing Needs</b>	may not be able to afford to continue living in their neighborhood due to increased property taxes. Lack of renter protections that would limit rent increases and eviction prevent low income residents of color from remaining in neighborhoods that are gentrifying. Lack of relocation assistance requirements prevent renters that are displaced from relocating in high opportunity areas as either renters or homeowners.	disproportionate housing needs for low-income households
<b>Disproportionate Housing Needs &amp; Publicly Supported Housing</b>	<b>Admissions and occupancy policies and procedures, including preferences in publicly supported housing:</b> Residents expressed concerns over HANO’s termination of housing assistance due to policies that evict tenants over minor infractions. Residents also feel that HCVP inspection procedures often do not address problems with homes in disrepair and that leasing is at the discretion of the HCVP landlords where discrimination can be factors in leasing decisions. In addition, HANO maintains a waiting list for available units that greatly exceeds available units. The 2016 HCV waitlist has 24,207 households and the Public Housing waitlist has 10,322.	<b>Medium</b> – One strike policies and minor infractions that evict subsidized tenants from housing can play a role in increasing the need for housing for tenants with a criminal background which in New Orleans is a population that is majority African-Americans.
<b>Disproportionate Housing Needs &amp; Disability Access &amp; Publicly Supported Housing</b>	<b>Access to publicly supported housing for persons with disabilities &amp; lack of affordable, accessible housing in range of unit sizes:</b> It appears that the City needs far more affordable, accessible units. Publicly supported housing as of 2016 is serving 6,934 households; however, individuals with ambulatory disabilities alone is 26,013.	<b>Medium</b> – Without affordable housing accessible units, persons with disabilities may continue to have disproportionate housing needs
<b>Disproportionate Housing Needs</b>	<b>Lack of private investment in specific neighborhoods:</b> Private entities will make the decisions on whether to invest based on existing information about an area and whether there are government incentives or prior public investments that they can leverage to create a profit if they invest in an area.	<b>Low</b> - Although this may be more of a factor in creating R/ECAPs or segregation, this is low in contributing to disproportionate housing needs. It does impact lack of jobs, lack of income, and high housing cost burden.
<b>Disproportionate Housing Needs</b>	<b>Community Opposition:</b> Community opposition can lead to developers withdrawing projects for affordable housing leaving a number of low and very low income households disproportionately affected, as the overwhelming need for affordable housing in New Orleans has not been met. <i>HousingNOLA</i> estimates that 33,000 affordable units are needed in New Orleans in the next 10 years.	<b>Low</b> –Opposition to affordable housing does negatively impact the needs of low and very low income residents but the impact is not significant.
<b>Disproportionate Housing Needs</b>	<b>Impediments to mobility:</b> <ul style="list-style-type: none"> <li>• Using a metro-wide Fair Market Rent as a base for HCVP payment standards does not allow HCV tenants the ability to reach higher-rent high opportunity neighborhoods.</li> <li>• HCVP households do not have access to a robust mobility counseling program that includes pre-move counseling, housing search assistance—including tours of different neighborhoods—an orientation to the new neighborhood, and post-move support.</li> </ul>	<b>Low</b> – Additional landlords in high opportunity areas as well as voucher holders access to higher rent-high opportunity areas is a high factor in moving from R/ECAP or segregated areas as fair housing issues, it is not a high on the fair housing issue of disproportionate housing needs.

<b>Disproportionate Housing Needs</b>	<ul style="list-style-type: none"> <li>• A number of landlords are unaware of how to become a landlord with the HCV program.</li> <li>• Voucher holders experience discrimination from landlords who do not want to rent to HCV participants.</li> </ul>	
	<p><b>Source of income discrimination:</b> Some residents have expressed that the housing needs of residents that do not participate in subsidized housing programs are not met as some landlords with affordable housing have a preference to lease to Section 8 voucher holders instead of renters who lack any subsidy. Others have expressed that landlords discriminate against leasing to HCV voucher holders based on the stigma associated with having a voucher.</p>	<p><b>Low</b> – Although source of income discrimination is a high contributing factor to fair housing issues of segregation and R/ECAPs as it is included in impediments to mobility, it is not considered a high contributing factor to disproportionate housing needs.</p>

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

**See Chart on next page.**

<u>Goal</u>	<u>Strategy</u>	<u>Fair Housing Issue</u>	<u>Contributing Factor</u>	<u>Timeframe for Action</u>	<u>Measure of Achievement</u>	<u>Responsible Program Participant(s)</u>
<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; Availability of affordable units in a range of sizes; Private Discrimination; Impediments to Mobility	1. 1-3 yrs 2. 3-5 yrs 3. 3-5 yrs	1. 20% of qualified tax adjudicated property is made available for development through OCD, NORA, HANO NOFAs. 2. Create 140 affordable rental units on HANO's scattered site property in high opportunity areas in Bywater and Uptown by 2021. 3. Complete onsite construction of 302 affordable units (Phases III-VII) at Bienville Basin, (formerly Iberville) which is situated in a high opportunity area	OCD, HANO, NORA
	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

<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Promote reforms to current zoning regulations including the development of mandatory inclusionary zoning policies to support the production of affordable housing in high opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity	Location and Type of Affordable Housing; Community Opposition; Land Use and Zoning Laws	1 - 3 yrs	Revisions to voluntary zoning ordinance by 2017; Passage of mandatory inclusionary zoning ordinance by 2017.	OCD, CPC HousingNOLA
	Prioritize City development incentives to support affordable housing investments in high opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity;	Location and Type of Affordable Housing	<1 yr	Developer Toolkit Created	Office of Economic Development, OCD, CPC
	Implement administrative streamlining policies in accordance with HUD regulations to increase landlord participation and HCV tenant mobility. <i>Federal Register Vol. 81 No. 45 FR-5743-F-03</i>	Segregation R/ECAP Disproportionate Housing	Location and type of affordable housing; Community opposition; Private Discrimination; Impediments to Mobility	1. < 1 yr 2. < 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

<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
	Prioritize the award of Project Based Vouchers (PBV) 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. < 1 yr 2. <1 yr	1. Vet with HUD the possibility of issuing neighborhood-specific PBV solicitations. 2. Establish a PBV implementation strategy with measures of achievement.	HANO

<p><b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b></p>	<p>Study the implications of Small Area Fair Market Rents and other potential Section 8 mobility strategies.</p>	<p>Segregation R/ECAP Disproportionate Housing Needs</p>	<p>Displacement of residents due to economic pressures Impediments to Mobility Location and type of affordable housing Location of proficient schools Access to proficient schools for persons with disabilities Private Discrimination</p>	<p>1. &lt; 1 yr 2. 1 – 3 yrs 3. 1 – 3 yrs</p>	<p>1. Complete feasibility study. 2. Within six months of feasibility study, develop a Mobility Action Plan with implementation protocol and metrics. 3. Monitor Action Plan implementation and refine as feasible to further mobility.</p>	<p>HANO</p>
<p><b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b></p>	<p>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.</p>	<p>Segregation</p>	<p>Private Discrimination; Lending Discrimination; Community Opposition;</p>	<p>&lt; 1 yr</p>	<p>Funding included in City budget</p>	<p>OCD, HANO, NORA</p>
<p><b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination</b></p>	<p>Expand fair housing outreach, education, and training for youth and other targeted populations through collaboration</p>	<p>Segregation</p>	<p>Private Discrimination; Lending Discrimination; Community Opposition;</p>	<p>&lt; 1 yr</p>	<p>Regular training and outreach schedule developed through 2018</p>	<p>GNOFHAC, SLLS, Advocacy Center, Office of Neighborhood Engagement, NORD-C, CPC, HANO</p>

and with fair housing organizations.	with NORD-C, Office of Neighborhood Engagement, One Stop Shop, and HANO.					
	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><b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b></p>	<p>Launch a public awareness campaign to create broad based support for fair housing efforts by 2019.</p>	<p>Segregation R/ECAP Disproportionate Housing</p>	<p>Private Discrimination; Lending Discrimination; Community Opposition;</p>	<p>1 - 3 yrs</p>	<ol style="list-style-type: none"> <li>1. Develop 2 PSA's on fair housing.</li> <li>2. Develop informational brochures on fair housing to distribute to landlords citywide.</li> <li>3. Develop informational brochures to educate residents on their rights as renters.</li> <li>4. Develop informational brochures to educate prospective owners on their rights in the lending environment.</li> </ol>	<p>HANO, GNOFHAC, OCD</p>
	<p>Expand the capacity of public call centers, and HCV caseworkers, public agency front desk personnel including and 311 operators to provide information on resources to address.</p>	<p>Segregation</p>	<p>Private Discrimination; Lending Discrimination; Community Opposition;</p>	<p>&lt; 1 yr</p>	<p>Trainings conducted with public call center staff; resource guide provided to public agencies</p>	<p>GNOFHAC, SLLS, Advocacy Center, City of New Orleans Departments, HANO</p>

<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Implement transparent tracking and reporting of fair housing complaints to the Human Relations Commission.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Reports available publicly	HRC, GNOFHAC, OCD
	Develop a robust plan to assess banks' performance related to the Community Reinvestment Act (CRA).	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need; R/ECAP;	Foreclosure rates that correlate with R/ECAPs; High denial rates for some protected classes; Lack of private investment in areas with protected classes; Low labor engagement; Lack of financial services are issues that inhibit fair housing choice.	<1 yr	Annual assessment of of lenders' performance in the City of New Orleans region completed. Host annual public forum with community based organizations, to discuss results of assessment.	OCD, HousingNOLA, GNOHA
<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</b>	Dedicate resources to support affordable homeownership and rental housing preservation and development for persons with disabilities.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition; Land Use and Zoning	1 - 3 yrs	Landlord Program Designed; 33% of home modification funds support accommodations for rental housing.	OCD

<p><b>disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Create a public awareness campaign to ensure the majority of Section 8 voucher holders are aware that they can use their vouchers to become homeowners.</p>	<p>Disparity in Access to Opportunity;</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1 - 3 yrs</p>	<p>Increase the number of Section 8 homeownership closings by 10% annually through 2018.</p>	<p>HANO</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>Increase engagement among individuals who have significant challenges in accessing safe and affordable housing.</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1. &lt; 1 yr 2. 1 - 3 yr</p>	<p>1. Add HCV residents to existing resident advisory board or reconvene an HCV specific resident advisory board. 2. Invite individuals with disabilities, prior criminal history, and LEP to participate in stakeholder workshops.</p>	<p>HANO</p>
<p><b>disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Review HANO's reasonable accommodation process for HCVP and public housing tenants.</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1. ≤1 yr 2. 1 - 3 yrs</p>	<p>1. HANO will provide updates to its reasonable accommodation process by 2017 to improve processes for HCVP and public housing tenants. 2. HANO will offer bi-annual training to its employees in conjunction with this policy.</p>	<p>HANO</p>

	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 2. 1 - 3 yrs	1. Ensure that 5 - 15% of all new HANO constructed units are built according to Section 504 accessibility standards. 2. Create incentives to increase the number of accessible units in <i>(Section 8 tenant-based and)</i> project-based developments.	HANO
<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 2. 1 - 3 yrs	1. 10% of OCD supported units developed are PSH units 2. Dedicate 120 project based vouchers to the City's Cooperative Agreement to Benefit Health Initiative (CABHI) for homeless individuals.	OCD, HANO, NORA, Unity
	Redesign programs serving special needs populations including PLWHA to maximize number of people receiving appropriate, adequate, quality housing.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures	1 - 3 yrs	HOPWA program redesign completed; 33% of all funds support rental assistance	OCD

	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 2. < 1 yr	1. Begin review of formerly incarcerated applicants using new Criminal Background Policy in Summer 2016. 2. Track implementation with reporting at 6-month intervals.	HANO
<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 2. 1 - 3yrs	1. Begin review of youth denied housing by 2017 2. Track implementation with reporting at 6-month intervals.	SLLS, HANO
	Draft and pass an ordinance that requires transparency and accuracy in background checks used to secure public and private rental housing.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Community Opposition; Admission and Occupancy Policies and Procedures; Impediments to Mobility	3-5 yrs	Ordinance passed	City Council, HousingNOLA
	Ensure fair housing and other housing resource materials are available in languages other than English.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Inaccessible government facilities or services	<1 yr	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.	OCD, NORA, HANO

<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>Revise HANO's Limited English Proficiency Policy.</p>	<p>Disparity in Access to Opportunity;</p>	<p>Inaccessible government facilities or services</p>	<p>&lt; 1 yr</p>	<p>1. Ensure Spanish and Vietnamese languages are addressed in new policy by 2017. 2. Determine if any items should be standard issuance in top 3 languages in New Orleans by 2017. 3. Continue to provide documents in other languages upon request.</p>	<p>HANO</p>
	<p>Identify alternate uses for vacant land to support food access, recreation and green space in underserved communities.</p>	<p>Disparity in access to opportunity</p>	<p>Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods</p>	<p>1 - 3 yrs</p>	<p>CNO Master Plan Adopted</p>	<p>NORA, CPC, CNO Development Committee, Economic Development</p>

<b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b>	Prioritize blight reduction efforts to stimulate private sector investment.	R/ECAP; Disparity in access to opportunity;	Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods; Deteriorated and abandoned properties;	1 - 3 yrs	Code Enforcement Plan Developed	Code Enforcement, OCD
	Examine private lender management of REO properties.	R/ECAP; Disparity in access to opportunity;	Lack of private investment in specific neighborhoods; Deteriorated and abandoned properties;	1 - 3 yrs	Assessment Complete	Code Enforcement, OCD
	Support development of 200+ affordable rentals in underserved communities.	Disproportionate Housing Needs	Availability of Affordable Units in a Range of Sizes Deteriorated and abandoned properties Lack of community revitalization strategies Access to publicly supported & affordable housing by persons with disabilities	1. ≤1 yr 2. ≤1 yr 3. 3 - 5 yrs	1. Complete redevelopment of 51 units of various sizes at Florida by 2017. 2. Complete redevelopment of 155 units at Guste III (155 units) by 2017. 3. Initiate redevelopment of 50 units at various sizes at BW Cooper (Marrero Commons) by 2021.	HANO

<p><b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b></p>	<p>Support development of affordable single family homes in underserved areas to support de-concentration of racial and ethnic concentrated areas of poverty.</p>	<p>SegregationR/ECAPDisproportionate Housing Needs</p>	<p>Availability of Affordable Units in a Range of Sizes Deteriorated and abandoned properties Lack of community revitalization strategies Access to publicly supported &amp; affordable housing by persons with disabilities</p>	<ol style="list-style-type: none"> <li>1. &lt;1 yr</li> <li>2. 3 - 5 yrs</li> <li>3. 3 - 5 yrs</li> <li>4. 3 - 5 yrs</li> </ol>	<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 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></p>	<p>HANO</p>
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<p><b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b></p>	<p>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.</p>	<p>Disparity in access to opportunity;</p>	<p>Lack of community revitalization strategies Lack of public/private investments in specific neighborhoods Lack of employment opportunities</p>	<p>1. 1 - 3 yrs 2. &lt;1 yr 3. 3 - 5 yrs 4. 3 - 5 yrs 5. 1 - 3 yrs</p>	<p>1. Commercial Development at Columbia Parc (St. Bernard) with proposal to include a grocery, health clinic, &amp; small commercial retail 2. Commercial Development at Bienville Basin (Iberville) with proposal to include a Yoga studio, café, &amp; small retail 3. Study feasibility of commercial development at Marrero Commons (BW Cooper) 4. Study feasibility of commercial development at The Estates (Desire) 5. Commercial Development in Bywater utilizing scattered sites inventory – Small scale retail</p>	
	<p>Direct more public land and financial subsidy towards affordable housing development, especially within a quarter-mile of any high</p>	<p>R/ECAP; Disparity in access to opportunity;</p>	<p>Availability, type, frequency, and reliability of public transportation; Location and Type of Affordable Housing; Location of proficient schools and school assignment policies.</p>	<p>3-5 years</p>	<p>RTA Strategic Plan Developed</p>	<p>OCD, Capital Projects, RTA, CPC, RPC</p>

	frequency transit stop and proficient schools.					
<b>Prioritize public investments in transit, quality schools, housing, parks, and other amenities in underserved communities.</b>	Prioritize City development incentives to support infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.	R/ECAP; Disparity in access to opportunity;	Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods; Deteriorated and abandoned properties;	1 - 3 yrs	Developer Toolkit Created	Office of Economic Development, OCD, CPC
<b>Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b>	Adopt Health and Safety Standards for occupied rental housing in the form of a Rental Registry and provide resources to assist low-income property owners in making needed repairs to their properties to meet health and safety standards.	R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need	Lack of private investment in specific neighborhoods; Deteriorated and abandoned properties	< 1 yr	Rental Registry Ordinance Adopted	CAO, Code Enforcement, City Council
	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

<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. 3. Institute a system with the City to exempt Section 8 landlords from multiple inspections resulting from HANO and City inspections.	HANO & City
	Pursue additional federal resources to support lead and other environmental remediation efforts.	R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need	Location of environmental health hazards; Land use and zoning laws; Deteriorated and abandoned properties	< 1 yr	Three discretionary funding opportunities pursued annually	OCD
	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

	Develop and implement a strategic plan to address environmental hazards including lead in water and housing.	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	Strategic Plan Developed 2. HANO continue annual HQS inspections for HCVP properties and annual HUD REAC inspections for Public Housing properties.	OCD, Code Enforcement, HANO, NORA, Health Department, Mayor's Office
<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeowner-ship and rental housing.</b>	Create incentives to preserve income-affordable rents at unsubsidized properties.	Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures	1 - 3 yrs	Program Designed; Resources Identified	OCD
	Develop 400+ affordable rental units in gentrifying neighborhood of Treme	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 2. 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

<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable home ownership and rental housing.</b>	Utilize HANO scattered sites inventory in gentrifying areas to develop affordable single family homes	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 - 3 yrs	1. Develop 45 on-site homeownership units (1/3 affordable) at Faubourg Lafitte in gentrifying neighborhood of Treme by 2018. 2. Target development of 5+ affordable single family homes utilizing HANO's scattered sites in Treme 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
	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; Support for community land trusts provided.	OCD, NORA, HANO

<b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeowner-ship and rental housing.</b>	Assist low-income homeowners in financial distress.	Disproportionate Housing Need	Displacement of Residents Due to Economic Pressures; Access to Financial Services; Lending Discrimination	< 1 yr	Develop New Programs such as low-interest loans to leverage additional financial resources.	OCD, FANO, Lenders
	Educate and encourage participation in existing housing cost savings programs.	Disproportionate Housing Need	Displacement of Residents Due to Economic Pressures; Access to Financial Services	< 1 yr	10% increase in seniors in tax abatement program; 10% increase in participation in energy efficiency programs.	HousingNOLA, LHC, Assessor
<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	

<b>Provide reliable, frequent, and affordable access to multiple transportation options to transit-dependent populations.</b>	Ensure that the Regional Transit Authority (RTA) serves areas with higher concentration of affordable housing and transit dependent populations.	R/ECAP; Disparity in access to opportunity;	Availability, type, frequency, and reliability of public transportation; Location and Type of Affordable Housing	1 - 3 yrs	RTA Strategic Plan Developed	RTA, OCD
	Include the participation of housing policymakers in the development of the RTA Strategic Plan	Segregation; Disparity in Access to Opportunity;	Availability, type, frequency, and reliability of public transportation; Location and Type of Affordable Housing	1 - 3 yrs	RTA Strategic Plan Developed with Housing Metrics Included	RTA, OCD
	Direct more public land and financial subsidy towards affordable housing development, especially within a quarter-mile of any high frequency transit stop and proficient schools.	Segregation; Disparity in Access to Opportunity;	Availability, type, frequency, and reliability of public transportation; Location and Type of Affordable Housing; Location of proficient schools and school assignment policies.	1 - 3 yrs	RTA Strategic Plan Developed; Identify adjudicated property in close proximity to transit lines	OCD, RTA, NORA, Finance Department

**The City of New Orleans and the Housing Authority of New Orleans thank our partners who contributed to the development of this assessment.**

- **Greater New Orleans Fair Housing Action Center**
- **PolicyLink**
- **Lawyers' Committee on Civil Rights Under Law**
- **HousingNOLA**
- **Enterprise Community Partners**



CITY OF NEW ORLEANS



## **2016 DRAFT ASSESSMENT OF FAIR HOUSING PLAN**

### **APPENDIX A – STAKEHOLDER ENGAGEMENT LIST**

## [AFFH Stakeholder List](#)

<b>Housing:</b>				
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	Ride New Orleans	Alex Posorske	(504)345-8360	<a href="mailto:info@rideneworleans.org">info@rideneworleans.org</a>

<b>Transportation</b>				
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	Bike Easy NOLA	Dan Favre	(504)861-4022	<a href="mailto:dan@bikeeasy.org">dan@bikeeasy.org</a>
	RIDE NOLA	Alex Posorske	504 / 345-8360	<a href="mailto:info@rideneworleans.org">info@rideneworleans.org</a>
<b>Social Services</b>				
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	City of NOLA - ADA	Page McCranie	(504)658-4020	<a href="mailto:ppccranie@nola.gov">ppccranie@nola.gov</a>
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	Brotherhood, Inc	Mark E. Johnson	(504)947-4100	<a href="mailto:mjohnson@brotherhoodinc.org">mjohnson@brotherhoodinc.org</a>
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CITY OF NEW ORLEANS



**2016 DRAFT ASSESSMENT OF FAIR HOUSING PLAN**  
**APPENDIX B – PUBLIC MEETING COMMENTS**

## **PUBLIC HEARING 1**

### **The following are details provided after first public hearing July 19, 2016 from the AFFH Team:**

In 2015 the U.S. Department of Housing and Urban Development (HUD) released a revised legal requirement that federal agencies and federal grantees further the purpose of the Fair Housing Act. This obligation to Affirmatively Further Fair Fair Housing (AFFH) has been in the Fair Housing Act since 1968. The City of New Orleans (CNO) and the Housing Authority of New Orleans (HANO) held its 1<sup>st</sup> Public Hearings for the 2016 Assessment of Fair Housing Plan (AFH) to receive public comments to Affirmatively Further Fair Housing (AFFH) on Tuesday July 19, 2016 at Sojourner Truth Neighborhood Center located at 2200 Lafitte Street in NOLA 70116 from 5:30-7:00pm. The Deaf Action Center provided a sign language interpreter, as well as, interpreters were available for Spanish and Vietnamese citizens in attendance with Limited English Proficiency (LEP). The 1<sup>st</sup> Public Hearing for the 2016 AFH Plan provided an opportunity for the residents of New Orleans to provide their views on Affirmatively Furthering Fair Housing as well as share their experiences in housing disparities, housing needs and access to opportunities in their neighborhoods.

CNO's Ms. Ellen M. Lee, Director of Housing Policy and Community Development welcomed everyone to the 1<sup>st</sup> AFH Public Hearing and introduced Mr. Bob Rivers, Director of the City Planning Commission (CPC), who provided an overview of the CPC Master Plan. The CPC's Master Plan is currently opened until the end of August 2016. The CNO's Master Plan was adopted in 2010 for a twenty (20) span, shaping New Orleans' physical, social, environmental, and economic future. The Plan for the 21<sup>st</sup> Century reflects the values and priorities that emerged through a community participation process and is grounded in information assembled for the first time in one place. Mr. Rivers concluded his remarks to the citizens attending the 1<sup>st</sup> Public Hearing for the AFH, inviting them to visit the CNO's website <http://www.nola.gov/city-planning/master-plan/> or to contact the CPC at (504) 658-7033 if they had additional questions.

Ms. Lee continued to address the citizens attending the 1<sup>st</sup> AFH Public Hearing, introducing the CNO's 2016 AFH partner the Housing Authority of New Orleans (HANO), Mr. Greg Fortner, Executive Director, Ms. Shelly Smith, Director of Strategic Planning (HANO), as well as, other collaborators which includes Ms. Cashauna Hill, Executive Director of the Greater New Orleans Fair Housing Action Center (GNOFHAC), Teddy K. Miller and Mary Lee, Consultants from Policy Link, as well as, OCD, HANO and GNOFHAC staff in attendance. After introductions, Ms. Lee (OCD) proceeded to describe HUD's 2016 Assessment of Fair Housing Plan to citizens in attendance. Ms. Lee described the AFFH rule as reasonably achieving 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 areas of poverty into areas of opportunity; fostering and maintaining compliance with civil rights and fair housing laws; as well as, to access the contributing factors that limit choice and access for low-income communities and communities of color to develop goals and strategies to overcome these factors. Ms. Lee (OCD) added that tonight's meeting (1<sup>st</sup> Public Hearing 7/19/2016) would provide the opportunity for all citizens to engage and be part of the 2016 AFH process. Ms. Lee also said it was important to re-visit the history of Fair Housing in America and invited Ms. Lee, from Policy Link to provide that information to the citizens in attendance. Ms. Lee (Policy Link)

gave a detailed overview of how on April 11, 1968, President Lyndon B. Johnson signed the Civil Rights Act of 1968, which included what is known as the Fair Housing Act. The Fair Housing Act was signed one week after the assassination of Dr. Martin Luther King, Jr. The Fair Housing Act is a federal law that provides protections from housing discrimination on the basis of protected classes. Ms. Lee (Policy Link) went on to share that a protected class is a characteristic of someone that cannot be targeted for discrimination under federal law (Race, Color, National Origin, Religion, Sex, Family Status, & Disability). Ms. Lee (PolicyLink) concluded her remarks to the citizens attending the 1<sup>st</sup> Public Hearing, saying the Assessment of Fair Housing Plan is being conducted by cities across the country and that the input of citizens is vital in contributing to this important planning process to Affirmatively Further Fair Housing (AFFH). The audience at the 1<sup>st</sup> AFH Public Hearing applauded and Ms. Lee, (OCD) introduced Ms. Cashauna Hill, Executive Director of the GNOFHAC to address the audience.

Ms. Hill began her remarks by giving an overview of GNOFHAC being established 1995 to eradicate housing discrimination throughout the greater New Orleans area. Since its inception, GNOFHAC has built a record of advocating for the fair housing rights of New Orleans consumers through enforcement, education, and homeownership protection. Ms. Hill went on to say that people often just think of housing discrimination as the refusal to sell or rent housing after an offer has been made. However, Ms. Hill said that New Orleans' segregation patterns can be identified by disparities in housing and life expectancy in certain zip codes. Large disparities in health exist between different groups of people in New Orleans, which can be directly assessed from zip code 70112, with a life expectancy rate of fifty-three (53) (majority African-American population) and the zip code 70124, with a life expectancy rate of eighty (80) (majority White population). Ms. Hill went on to explain through a Fair Housing power point presentation that these differences systematically place socially disadvantaged groups at further disadvantage on health, compounding the significant challenges these groups already face, economically, education, housing etc. Health disparities also have a direct financial cost, as well as, an overall effect on the quality of life for residents. Ms. Hill also discussed how political decisions of the past, such as the I-10 construction on N. Claiborne Avenue in the Treme neighborhood of New Orleans continues to have a negative economic impact on a once thriving African American neighborhood. Ms. Hill added to her comments of how GNOFHAC developed and utilizes surveys to get citizens' input on the community engagement process, providing the AFH Team a "New Orleans Assessment of Fair Housing Public Comment Form" to stimulate citizen input and engagement at the 1<sup>st</sup> AFH Public Hearing. The audience applauded and Ms. Lee (OCD) proceeded to describe how citizens would be asked to complete the Public Comment surveys and break into smaller groups to share fair housing concerns and neighborhood opportunities within communities. Ms. Lee concluded her comments saying that the smaller groups at the 1<sup>st</sup> AFH Public Hearing would be addressing the following issues in relation to Affirmatively Furthering Fair Housing. The AFH Facilitators of the smaller groups addressed the following concerns. Ms. Lee (OCD) invited all in attendance to break into the smaller groups and an AFH Facilitator would pass out the Public Comment surveys so everyone could engage and provide input in the AFFH process.

**Overall Comments from the 1<sup>st</sup> AFH Public Hearing at Sojourner Truth  
Neighborhood Center by Small Groups:**

**Table One:**

**Greatest Housing Problems**

- Affordability. Most people thought affordability was the biggest problem.
- Where the hospitals are built the prices are going way up. A lot of people have been put out by the landlords near the hospitals because the landlords are raising rents.
- Displacement in the hospital region
- The only option for people is habitat for humanity.
- “If it wasn’t for Section 8, I would be out on the street.”
- Marrero Commons is low-income and Section 8
- Access to jobs is a problem. People working temporary jobs, jobs are not sustainable

**Jobs in Different Neighborhoods**

- Transportation
- Jobs are concentrated in certain areas
- Criminal background checks are keeping people from getting jobs
- Like the airport, there are a lot of jobs, but it is really far, the JP bus is different from Orleans parish
- The streetcar is being built in the Bywater where they already have transportation
- People who need transit in poor black neighborhoods have to walk a far way to get anywhere, transportation is going to the richer areas still
- The transportation is made for the tourists
- Driving, transportation close to work can be expensive
- Jobs that are close to home don’t pay that much

**Other issues**

- Food deserts /A lot of blight in the industrial canal area
- Tapping into community services is important. There are community services but people are not aware of them.
- One bedroom market rates in tax-credits are over a year waiting list
- HCV is for very, very low income people
- Most people on the list don’t get off the list until they pass away. A lot of people might qualify for the 60% units. Even on social security people are over income.
- People living in deplorable conditions. Mold, termites, lead paint, general disrepair. Leaks and not function air conditioners. Landlords are unresponsive.

- Where are people going? A lot of people living with families or in the shelters. Increase in homeless – living under the overpass, hanging out on the neutral ground, Carrollton, Napoleon,
- Rent is too much. Paying 1,200 a month with four kids to be comfortable.
- Coming out of a housing development is like “Oh my god, what am I going to do.” Choosing between being comfortable and pulling child out of college.
- Since Katrina, it hasn’t gotten back to the point where it was. Conditions of homes. Some homes are deplorable and some people are living in luxury.
- People building and constantly coming in from other states and pushing people out from better areas into the slum areas.
- Students have to take the bus at 7 in the morning
- Privatized community police and neighborhood watch that goes around. The construction is well-maintained uptown. In lower-income areas construction is not as orderly. Majority of the houses in neighborhood uptown are AirBnB.
- Blight map is concentrated in certain areas of the city. In Pigeontown, only five houses are lived-in and the other are blighted.

### **Concerns about how investments are made**

- Grocery stores. No affordable grocery stores in vast places of the city
- Building a grocery store at Columbia park, which is good, but it is the only one
- Big infrastructure to reduce flooding uptown, but there are a lot of areas that have a lot of flooding
- Not doing any work on roads in poorer black neighborhoods
- Want to see more equity in construction, levees, streets, potholes, lighting

### **Table #2**

#### **Greatest Housing Problems**

- Not enough low-income & affordable housing.
- Bad streets & not enough lighting
- High rent versus low wages
- Low quality of housing (not up to code)
- Difficulty of upfront costs (deposits & first month rent/when you don’t have assistance & even with assistance)
- Higher rent forces people out of their community

#### **Which are available in your neighborhoods?**

#### **Schools:**

- Schools, are fair, not good
- A bus is the only way to get to school, can create a very long day.
- Not enough good schools
- Problems with resources at schools.
- Lack of parent involvement.
- Not enough libraries.
- Libraries not open late enough.

#### **Access to Healthy Food:**

- There is Whole Foods, but it's unaffordable.
- Access to healthy food, but not **affordable** healthy food.
- Not enough grocery stores
- Corner store food (not healthy)
- Not enough grocery stores
- Food stamps not enough to afford healthy food.

**Transit Access:**

- Buses running less frequently.

**Recreation Facilities:**

- Recreation Facilities are available (but not programming)

**Jobs & Economic Opportunities:**

- Schools not offering enough vocational education.

**Quality Health Care:**

- Not enough neighborhood-based clinics (were more before Hurricane Katrina)
- Not enough residents have health insurance.
- Insurance is very costly, some deductibles are way too high.
- Health coverage from the State is limited.

**Neighborhood Concerns:**

- Rising rents
- Blight
- Unsafe occupied houses
- Violent crime
- Exposure to environmental health hazards
- Poverty
- Racial segregation
- Groups working w/minority poverty populations should go through **undoing Racism Training**

**Do all communities benefit equally?**

**Other Comments:**

- In mixed-income communities third-party managers are a problem (not community focused)
- Blighted houses a big issue
- School Buses are only on major roads, not into communities. (People) Have to walk a long way for kids to catch a bus.
- City buses also don't go into community, only outskirts on major roads.
- Community also has to take responsibility for some issues
- Uneven investment/infrastructure/development/allocation of resources in certain neighborhoods; seems like a way to push people out so developers can buy cheap and redevelop.
- Agriculture street landfill. Built on top of a landfill. Environmental injustice. Found out in 1993. Has cancer at 34. No school in the area. No store in the area. No bus in the area. Homeowners from HANO who are paying taxes but are not able to access their properties. Want relocation for the 53 people who are left back there.

### **Table #3**

- No knowledge of renter right and the power to enforce violation, as well as, risk of eviction
  - Neighborhood Schools – better intergrated with community
  - Housing needs and concerns should be on substandard properties. Lots of blighted property.
  - Education for the Public on renter’s rights.
  - Converting Duplexes into Single-Family creates less rental housing.
  - Substandard Housing.
  - Demand for housing near schools, jobs, etc.
  - Gentrification causing residents to be pushed to areas with a lot of poverty to areas with less amenities and transportation.
  - Budget priority: build less jails, and put more funds into affordable housing and schools and youth improvement.
  - Short term rentals are causing evictions and will raise rent prices.
- 
- Not enough safe, low-income housing. “It is the housing society thinks we should have because we are low-income.”
  - Everything is a concern on the list. Those people are gone. The developers come and bring these management teams come in. People were told “If we fix the gates, we are going to raise your rent.”
  - We need to take the community back as a community. It is not about community anymore. Marrero Commons.
  - Discrimination because a person would like more Cash instead of a Voucher.
  - Public Housing taking too long to complete, like Guste.
  - Schools: Need better neighborhood schools, loss a sense of community, no school pride.
  - Need more affordable housing
  - Live close to schools.
  - Transit not good in Jefferson, New Orleans East. No regional connectivity.
  - Do the individual public housing sites have a responsibility to inform tenants of what is happening in housing programs.

### **Table #4**

- Difficulty finding a house. Slum landlords. No jobs, no healthcare. PCP licenses? Access to food pantries. Downtown and Carrollton areas. Grocery stores. Only Walmart, Family Dollar, Dollar General. Community stores with no good food
- Abandoned houses with mold, termites, etc. Landlords expect tenants to make repairs.
- Renters not having knowledge of what their rights are? Not having power to hold landlords accountable. The schools don’t seem integrated. People seem forced into accepting substandard housing. A lot of blighted housing.

### **Table #5**

- Transportation and infrastructure. Transportation not accessible. Not taking care of people who use services.
- Agriculture street landfill. Built on top of a landfill. Environmental

## **PUBLIC HEARING 2**

**The following are details provided after the 2<sup>nd</sup> public hearing September 10, 2016 from the AFFH Team:**

The City of New Orleans (CNO) and the Housing Authority of New Orleans (HANO) held its 2<sup>nd</sup> Public Hearings for the 2016 Assessment of Fair Housing Plan (AFH) to receive public comments to Affirmatively Further Fair Housing (AFFH) on Saturday September 10, 2016 at the Treme Recreation Community Center located at 900 N. Villere Street in NOLA 70116 from 10:00am until Noon. The purpose of the AFFH rule includes the duty to Affirmatively Further Fair Housing, means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The AFFH rule 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 areas of poverty into areas of opportunity; fostering and maintaining compliance with civil rights and fair housing laws; and to access the contributing factors that limit choice and access for low-income communities and communities of color to develop goals and strategies to overcome these factors.

The Deaf Action Center provided a sign language interpreter, as well as, interpreters were available for Spanish and Vietnamese citizens in attendance with Limited English Proficiency (LEP). The 2<sup>nd</sup> Public Hearing for the 2016 AFH Plan provided an opportunity for the residents of New Orleans to provide their views on Affirmatively Furthering Fair Housing as well as share their experiences in housing disparities, housing needs and access to opportunities in their neighborhoods. Ms. Ellen M. Lee, Office of Housing Policy and Community Development Director with the City of New Orleans opened the meeting welcoming everyone and presented details describing President Obama's Fair Housing initiative to Affirmatively Further Fair Housing (AFFH). To begin, Ms. Lee stated that "housing is a basic human right" and that the purpose of the 2<sup>nd</sup> public hearing was to gather citizen input to identify contributing factors that limit or deny fair housing choice or access to opportunity, that negatively impact fair housing or civil rights compliance. Ms. Lee went on to say to residents that housing is more than four walls and a roof. It is part of a neighborhood and community, providing opportunities for positive social interaction and safety from crime. Ms. Lee's Affirmatively Furthering Fair Housing (AFFH) power point provided information that included a 'Snapshot of New Orleans' that provided facts, including since 1990 New Orleans has become an increasingly racially segregated city. In addition, Blacks and Hispanics are far less likely than their White counterparts to live above the poverty level, participate in labor markets, and live in close proximity to jobs. Ms. Lee addressed the fact that significantly more Blacks and Hispanics live in substandard housing and that Public housing residents are 94% Black and Housing Choice Voucher (Section 8) participants are 95% Black.

Ms. Lee furthered the AFFH presentation addressing the '*Goals of Affirmatively Furthering Fair Housing*' process to first take proactive steps beyond simply combating discrimination to foster more inclusive communities. Addressing significant disparities in access to

community assets of those identified as part of the protected class, is vital to overcoming segregated living patterns in New Orleans. Ms. Lee talked about the need for meaningful community engagement, at the 2<sup>nd</sup> AFFH Public Hearing, as she went on to identify the following proposed Fair Housing Goals and asked for the residents to give their input (see entire CNO & HANO “Join to Discuss Affirmatively Furthering Fair Housing” 2<sup>nd</sup> Public Hearing Power Point Presentation Appendix X):

- Increasing Access to Neighborhoods of Opportunity
- Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.
- Increasing Investment in Underserved Neighborhoods
- Prioritize public investments in transit, quality schools, healthy foods, parks, and other amenities in underserved communities
- Provide monetary support for local fair housing groups’ education and enforcement programs.
- Issue a Fair Housing Month (April) press release from the Mayor’s Office highlighting fair housing resources.
- Schedule training for 311 operators on fair housing issues and resources.
- Ensure that internal policies and practices advance access for groups with significant challenges in accessing safe and affordable housing, including people with criminal records and people with disabilities.
- Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.
- Prioritize blight reduction.
- Reserve publicly owned land in high-opportunity neighborhoods for affordable housing.
- Prioritize public subsidy for development in high opportunity neighborhoods.
- Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and rental affordable housing and developing affordable rental and homeownership housing.
- Provide reliable, frequent, and affordable access to multimodal transportation options to transit – dependent populations.
- Work with the Regional Transit Authority (RTA) to ensure that public transit serves areas with higher concentrations of affordable housing and transit – dependent populations.
- Direct more public land and financial subsidy towards affordable housing development, especially within a quarter – mile of any high frequency transit stop.

As Ms. Lee wrapped up the AFFH presentation and discussion telling residents’ their comments were recorded and will be included in the 2016 Assessment of Fair Housing Plan (AFH). The AFFH Plan will be incorporated into the CNO’s Consolidated Plan, Housing for a Resilient New Orleans, HousingNOLA, as well as, HANO’s Public Housing Agency (PHA) Plan. Ms. Lee encouraged residents to provide additional feedback and to inform other residents about the AFH Plan to expand outreach to ensure everyone is included in the Affirmatively Furthering Fair Housing process. Ms. Lee thanked everyone for participating in the AFFH process and informed that they would be contacted by e-mail, as well as, updates on the CNO website: <http://www.nola.gov/community-development/> for future events

involving Affirmatively Furthering Fair Housing in New Orleans. The summary of public comments referencing the Affirmatively Furthering Fair Housing Goals presented by Ms. Lee follow the 1<sup>st</sup> AFFH Public Hearing Comments in the following section. In addition all public hearing comments were recorded at both AFFH Public Hearings.

## **AFH Public Hearing Comments**

### **Saturday, September 10, 2016 Twenty-Six (26) Residents Attended:**

1. HUD representative, Kimberly Parker, stated that HANO and the City of New Orleans needs to prioritize goals, develop timeframes (5 or 10 years) to accomplish goals, and provide more specific actions so that the plan would not be rejected.
2. Representative from Jane Place Neighborhood Sustainability Initiative (JPNSI), Breonne Decker, encouraged HANO and the City to provide permanent affordable housing
  - Identify metrics and benchmarks that tell what, how, and when and
  - Prioritize investments to protect low income and
3. Stand with Dignity representative, Colette Tippy, statements were that the AFH plan needs goals that address:
  - Housing needs of very low income,
  - Affordability is disproportional for low-income families,
  - Supportive services in housing for mental health,
  - Residents that are being priced out of neighborhoods that have been targeted with placed based strategies,
  - Specifically the St. Claude/ByWater Neighborhood and Oretha Castle Haley Neighborhood in Central City as investments and amenities are resulting in gentrification, bringing up rents and creating situations where low-income people are priced out of their neighborhoods,
  - Slum landlords,
  - Access to fresh foods in low income communities,
  - Recommendations that give specifics on how the rental registry was enforced,
  - The need for a centralized list of rentals to assist finding housing in different areas noting that the HCVP list is always out dated. Perhaps HCVP landlords can post vacancies on the HANO website.
4. Brother Watson of Stand with Dignity stated that seniors are breathing in mold and subjected to lead while living at Guste High Rise. Resident stated that they have been breathing mold for thirty (30) years and that Hurricane Katrina made things worse. Brother Watson also expressed that that when setting Fair Housing Goals, special attention should be given to those living with disabilities. In addition, the resident stated that he felt that his neighborhood was crime infested and that he and his neighbors did not experience fair housing, expressing that it was not about color and we all need to help each other.
5. A resident of St. Bernard Parish stated that she applied for HCV housing in 2013 but she has been in the dark regarding her status on the list but has heard that you will not get a voucher until your near death. The resident went on to say that she felt that the Section 8 system lacked transparency and that she felt that it was not fair, as she just receives a letter annually that she is on the waiting list.
6. Margaret McMillan of Desire Estates state the following:
  - Rebuilding was hindered at Desire
  - Inferior and poor quality materials were used to complete Desire
  - Residents of Desire had to put their dreams of homeownership on hold once Hurricane Katrina added to the number of people who were made homeless

- AFH plan needs more specifics and timelines in goals because without specific information goals will not be fulfilled as they were not fulfilled with the Desire project
  - Desire development needs a homeownership component.
  - Desire needs more sustainable housing and a better quality of life for residents. Ms. McMillan expressed frustration saying that she would like to get a Section 8 Voucher to a neighborhood outside of New Orleans in the United States where she and her family could live in a safe and decent environment.
7. One resident asked about privatization of HANO properties and HANO explained that developments have been developed as mixed use with public housing units, market rate units, and tax credit units as a means to deconcentrate poverty.
  8. Puentes representative, Scarlet Garcia, requested that the AFH plan be more transparent with dates to accomplish goals. She also mentioned that HANO and the City should make documents available in other languages and that HANO needs more bilingual personnel in the HCVP department. Ms. Lee added that the AFH plan is available in other languages upon request
  9. HUD representative noted that HUD has many materials in different languages and that HANO and the City can utilize their resources that are in other languages.
  10. Meg Lousteau, a Tremé resident, asked about whether anyone could be HCVP landlords. She states that she was unaware and that HANO should have a goal to improve communications to recruit more landlords in diverse areas. Too much money is invested in slumlords.
  11. Monika Gerhart of Greater New Orleans Fair Housing Action Center (GNOFHAC) stated that the AFH should have a goal of recruiting more landlords and streamlining the process to become a landlord. GNOFHAC can assist HANO.
  12. Mr. Bill Dwyer an uptown resident asked about how CNO liens from Code Enforcement are lifted from a property. Ms. Lee addressed this comment saying that the property owner would have to go through the CNO's Code Enforcement process to lift liens. Mr. Dwyer went on to express that the CNO could refuse federal funding to administer affordable housing. HUD's Ms. Kimberly Parker stated that there would be no reason for the CNO and HANO not to move forward and administer well needed federal funding to provide affordable housing to low-income families in New Orleans.
  13. A resident spoke out concerned about what could be done to stop people from buying all of the blighted properties and leaving local residents, who have been there for 30 years plus. More attention should be given to those low-income residents, providing them the opportunity to live in these rehabilitated properties.
  14. Mary Cunningham of Council member Susan Guidry's office will brief the council member on AFH goals.
  15. Kevin Hurstell of the Advocacy Center mentioned that the AFH plan needs to address how much money residents are making that provides obstacles to obtaining housing in certain areas; therefore, the AFH should have goals related to job creation and higher wages.
  16. One resident was concerned with the application of the criminal background policy as residents with criminal backgrounds have a difficult time finding housing in New Orleans. Ms. Lee stated that HANO is definitely focusing on this issue. HUD's Ms. Parker added that public housing can address and enforce the criminal background issue, however, HUD has no power over the private sector regarding this issue
  17. HUD representative explained that HANO's criminal background policy was a good start but it is not citywide but only for HANO properties.
  18. A resident spoke out saying that it is almost impossible to identify where rental property is here in New Orleans. There are various sites online that appear outdated. There is a strong need for a Rental Registry focusing on listing available Affordable Rental Housing. In addition, it was suggested that Section-8 should post properties on the proposed Rental Registry

### **PUBLIC HEARING 3**

**The following are details provided after the 3rd public hearing October 3, 2016 from the AFFH Team:**

The City of New Orleans (CNO) and the Housing Authority of New Orleans (HANO) held its 3rd Public Hearings for the 2016 Assessment of Fair Housing Plan (AFH) to receive public comments to Affirmatively Further Fair Housing (AFFH) on Monday, October 3, 2016 at the Helen W. Lang Board Room located at 4100 Touro Street, New Orleans, 70122 from 6:00pm until 7:15. The hearing went as follows:

- Ms. Shelley Smith, HANO Director of Strategic Planning, on behalf of Gregg Fortner, HANO Executive Director welcomed the public and introduced Board Commissioner, Andreanecia Morris, who convened the hearing.
- Commissioner Morris welcomed public participation and summarized the purpose of the hearing which was to gather final feedback on the 2016 Draft Assessment of the Fair Housing Plan (AFH). She explained that the hearing is to receive comments that will be considered in finalizing the plan and goals. She introduced, Ms. Ellen Lee, Director of Housing Policy and Community Development, and gave her the floor to present on the many facets of the AFH plan.
- Ms. Lee thanked partners and the public for their attendance. She asked if anyone was unfamiliar with plan and no one responded in the affirmative. She then summarized the purpose of the plan, gave an overview of topics that were analyzed, and gave an in-depth review of goals and strategies.
- After Ms. Lee's presentation concluded, Commissioner Morris opened the floor for public comments.

### **AFH Public Hearing Comments Monday, October 3, 2016:**

#### Bruce Reilly, Voice of the Ex-Offender (VOTE)

- Discrimination happens through choice and there are many forms that often overlap.
- Race cannot be subsidized so dealing with that will take the City not just HANO.
- Housing Discrimination is a proxy for race.
- He is unclear regarding the underlying meaning of the goals that requires background checks for private and subsidized housing.

#### Max Ciardullo, GNOFHAC

- For the most parts the goals have been aligned with all parties involved.
- The concern is with the metrics to meet goals.
- The metric which ties the feasibility study for mobility strategies to HUD processes can cause unwarranted delay when HANO may be able to start working with partners sooner.
- The goal that aims to reduce HCV tenants living in R/ECAP areas by 3% over five years to non-R/ECAP areas only moves residents from extremely high poverty to high poverty areas. The metric should be to move them to high opportunity neighborhoods with low poverty.
- The metric to invest in underserved areas was written to encourage other amenities around housing. Residents for years have seen only housing placed in their communities with little amenities like commercial developments and parks.

Steve Kennedy

- HANO and the City should look at REO properties owned by the Finance Authority.
- Please consider restoration tax abatement for developers in high opportunity neighborhoods because owners cannot keep affordable when taxes are significantly increased.
- Transit oriented development should be included for the regional transit authority to participate with the City and developers to purchase property near transit and develop as housing.

Shana Griffin

- The AFH plan needs greater inclusion of gender analysis and gender identity with such issues as Violence Against Women Act.
- 64% of all renter households in New Orleans are headed by women.
- 57% of HCV households are women with children.
- The AFH plan only has 3 pages that reference women. One page references gender, yet 31 pages reference race.
- A women's mobility depends upon her race, gender, income, marital status, and other factors.
- Women bear the brunt of violence.
- Low and moderate income black women have the least access to opportunity.

## **Assessment of Fair Housing (AFH) Outreach Meetings for General Public**

### **1. New Orleans East HCVP Dinner on AFFH at the New Orleans East Library 8/25/2016**

2016 AFH Outreach Meetings: At the end of August, GNOFHAC and Southeast Louisiana Legal Services co-hosted a dinner for voucher holders in New Orleans East to discuss the AFH. This is a group that we were worried might not otherwise have the time, resources, or transportation to be able to meaningfully participate in the public comment process. The attendees included six HANO clients. All but one were members of HCVP households.

Most feedback was verbal rather than written, so we took extensive notes and have compiled them. They are below provided here and grouped by topic in hopes that it will aid you all in your efforts to incorporate them into the AFH.

#### **Feedback from Attendees/Community Residents**

##### **Many units are in substandard conditions:**

- The condition of houses that are passing inspection are unacceptable. The ceiling is leaking, the plumbing isn't working, and the landlords still get their rent.
- There should be more inspectors of Section 8 properties.
- The landlords are paying the inspectors to pass the apartments.
- "What can we do about slumlords? A woman complained about rats in her house and the landlord gave her an eviction notice."
- "I don't see anything broken, but I can see mold through the walls – where they painted over it."
- Another tenant had a landlord who was paid off by the inspector and he came and sat and watched TV and then pass the unit, even though it was in deplorable condition.
- People are afraid to complain to their landlord because of retaliation. "If people find out you complain, they terminate you."
- Landlords come into their Section 8 houses without notice—they're treated differently than market rate tenants.

##### **Location/Amenities:**

- Everyone agreed that there are no safe outdoor play spaces for children, especially at apartments in the East.
- The bus is ridiculous. Transportation takes a long time and is much more of an obstacle than when residents lived in traditional public housing communities.
- There are no jobs nearby.
- Schools are not high quality and children have to wait very early in the morning to ride the bus to other schools.
- Problems with flooding and water.

##### **Termination process is unfair:**

- Nearly all tenants agree that there needs to be more support for tenants in the termination process. Tenants feel that they're put out for anything.
- "I had to go to the hospital and someone kicked in my door and took half my stuff. And HANO didn't want to fix anything. They took half my stuff and didn't want to fix anything, and after, I just took the rest of my stuff and didn't go back. And I feel like they are holding that against me."
- "When a family loses their house, they lose everything. There are so many homeless people."

- Give people second chances. “Everybody deserves a chance. When you take away someone’s voucher, you take away their life.”
- “If you have any kind of a criminal background, if you got caught with drugs, you get denied. You can’t get into that project.

**Concerns about tenant representation:**

- HANO resident leadership and residents should come together. Should have active residents on the Section 8 board.
- The residents don’t know what’s going on. People don’t know who to go to. Who is the leadership?
- Need more tenant representation.
- Lack of HCVH education, involvement
- Information doesn’t filter down from HANO. Residents ask each other b/c they don’t get the info from HANO

**There’s Little To No Education About How The Process Works/Existing Resources**

- Many people don’t know the right questions to ask. People aren’t aware of the rules and regulations.
- People aren’t educated about how the system works. Have to teach the tenants what questions to ask.
- Training residents on what programs they are in.
- Have trainings done right on site – for employment opportunities too. “You don’t know where to look for work, if you don’t know who is hiring.”
- Have employees go to the housing units.
- Many people don’t know about resources – there is a garden. Participant lives nearby but didn’t know about the garden.

**HANO Staff - There should be more/better trained officers.**

- HANO compliance officers don’t listen. “If you want to help somebody, you listen.”
- HANO staff isn’t responsive. The wait time is long for a response if you have a question or concern.

**Other topics/concerns**

- Woman who lost her voucher cites overcrowding – she’s doubled up with her adult daughter and granddaughter
- Housing is causing stress. Doctor wrote a letter.
- “I lived under the bridge before I got help. I got a house. The house where I was living, took my whole entire check. I had to give my food stamps to my landlord.” (Having a voucher means a lot to a lot of people)
- “They don’t have anything available and if you go to apply, you are going to be turned down.”

## **Dillard University Housing and Health Fair Assessment of Fair Housing Seminar – September 24, 2016**

### **CNO & HANO– Stakeholder Discussion of AFH**

The City of New Orleans and HANO continue to work with stakeholders and community leaders to further fair housing, to ensure the elimination of housing discrimination and segregation due to race, color, gender, religion, national origin, familial status or disability. The CNO and HANO participated in Dillard University's 10<sup>th</sup> Annual Housing, Health & Home Improvement Fair to provide outreach at a workshop on Saturday September 24, 2016 from 10:30-Noon. This session allowed the opportunity for public comment on how the AFH can affirmatively further fair housing, by assessing fair housing challenges and developing goals and strategies to overcome factors that limit choice and access to opportunity. In a power point presentation, Ms. Ellen M. Lee, Director of Housing Policy & Community Development led the discussion on taking proactive steps beyond simply combating discrimination to foster more inclusive communities. Providing access to community assets for all persons protected by the Fair Housing Act, addressing significant disparities in access to community assets, overcoming segregated living patterns, supporting and promoting integrated communities, ending racially and ethnically concentrated areas of poverty as well as, ensuring compliance with civil rights and fair housing laws were the goals addressed to spark public input.

Close to thirty (30) residents attended the AFH Stakeholder discussion at Dillard University. Ms. Lee provided the opportunity for residents to share their comments on the proposed goals of the AFH:

- A resident expressed the inability to find quality rental housing (house occupied has mold) with their Section-8 voucher after Hurricane Katrina and that there were too many slum-landlords.
- Residents would like to see a Rental Registry for available quality housing.
- Resident expressed that there are too many slumlords in New Orleans East and complained that the landlords do not give back your deposit.
- A resident expressed that more awareness is needed about agencies like the Greater New Orleans Fair Housing Action Center and the Advocacy Center
- A resident expressed that they will be over the income to remain in the Preserve Apartments under the Section-8 program, the resident now pays \$965.00 per month.
- A resident expressed that it is difficult for seniors to pay for insurance on their property and that gentrification has made their neighborhoods unaffordable.
- A resident thought it was a good idea that the AFH can be made available in LEP.
- A resident suggested that local grocery stores kiosk should be utilized to inform the public about fair housing issues that involve rent control, as well as, advertising affordable housing.
- A resident expressed that the Wells Fargo affordable housing program should be utilized more.
- A resident expressed the need for more Permanent Supportive Housing (PSH) programs
- A resident expressed that private-landlords should adhere to not discriminating against people with criminal backgrounds and that the City Council should pass an ordinance with this law.
- Residents agreed with AFH goals to place bus lines close to resident housing.
- Resident expressed the need for better access to public transportation in the lower-ninth ward.

- Resident expressed the need for a grocery like Chicken Mart in the lower-ninth ward.
- Resident expressed the fear of gentrification in the lower-ninth ward.

Ms. Lee thanked everyone for their attendance and encouraged everyone to continue to be part of the Affirmatively Furthering Fair Housing community engagement process by checking the CNO website for future meetings, as well as, access the 2016 Assessment of Fair Housing Plan:  
<http://www.nola.gov/community-development/>

**HANO Resident Advisory Board (RAB) Comments**  
**Draft 2016 Assessment of Fair Housing Plan**  
**Meeting Date: September 14, 2016**

**Disparities in Access to Opportunity**

Environmental

- There is lack of access to parks, stores, and community.
- Some housing has mold.
- HANO and the City have to figure out how to get big businesses to come to certain communities.
- Incentives need to be targeted to certain areas.

Schools

- High performing schools are not in black communities.
- Children have to be on school buses at 5am and then many ride the bus for two hours, so functioning at a high level is hindered.

Jobs

- We need better jobs.
- We can't access jobs in other locations because there is no transportation.
- Wages in New Orleans are like a 3rd world city and incomes are not rising.

Crime

- Every multifamily property with over 6 units needs to put in cameras to deter crime.

Other

- People ages 45 to 60, the middle class, and those near middle class are left out from receiving needed assistance.
- Residents in New Orleans East do not have grocery stores, proficient schools, transportation, and family support systems as they are scattered throughout the City. Without family support, they do not have access to child care.

**Publicly Supported Housing**

- HANO needs to market advantages in public housing and HCV communities.
- HANO needs to ensure that developers use quality materials instead of inferior products which cause environmental hazards.
- There is not enough affordable housing at public housing developments.
- HUD Data may not be true as a number of black families underreport to data collectors due to fear of policies.
- Some families are paying over 35% of income in rent in addition to utilities.
- Families have been pushed out of public housing to live in substandard housing.
- HANO needs to review HQS standards and inspection which allows substandard housing.
- HUD likes paper but nothing really changes. People get discouraged because plans aren't implemented.
- One tenant makes 28,000 and pays \$1100 a month in rent which is too much.

- More public housing residents are living in New Orleans East than were in the Big 4 public housing developments because most now have HCV vouchers.
- Public Housing that has been rebuilt was not for poor people but for others.
- HCVP workers do not answer phones.
- HANO should ensure that families at Florida can come home.
- A bridge is being built from Florida to Elysian Fields that may encroach upon HANO property for Florida.
- Landlords live out of town and prohibit timely repairs. Landlord evaluations are needed so tenants can know about poor landlords.

### **Segregation/R/ECAPs**

- We need rent control where we put more value based on location. For example, rent on St. Charles would be more than on Martin Luther King Blvd.
- Landlords know to how discriminate without repercussions.
- A lot of families do not want to be in the East but cannot afford other areas.
- Vacant homes across from Guste are selling for 300,000 and even a block from O. C. Haley in Central City.
- Some of us would like to live near Iberville but we are in the 9th Ward. Bienville Basin wants \$950 a month and a voucher doesn't cover the apartment and 1st and last month's rent.
- People have been forced out of neighborhoods due to others coming into the neighborhood and raising prices.

### **General**

- Plans are subjected to change in government administrations.
- HANO and the City need to address that families are struggling to get security deposits. Poor families don't have access to \$1500 at one time.
- Everyday people are crying because landlords will not return security deposits.
- Education on tenant rights is needed.



CITY OF NEW ORLEANS



**2016 DRAFT ASSESSMENT OF FAIR HOUSING PLAN**  
**APPENDIX C – COMMENT LETTERS**

**From:** John McGuire III [[mailto:mcguire3\\_john@yahoo.com](mailto:mcguire3_john@yahoo.com)]

**Sent:** Monday, August 29, 2016 4:30 PM

**To:** AFFH

**Subject:** Fair Housing Tool

This project is doomed for failure. You can not change housing inequality by taking the money of hard working people and giving it to wealthy housing developers to build expensive homes for the poor. Envy and greed lie at the core of these programs. As an African American it is deplorable how people pray on the ignorant to fatten their own pockets. Real reform focuses on the person and helping them make better choices so they earn the resources necessary for better housing.

Ecclesiastes 10:5-6 There is another evil I have seen under the sun. Kings and rulers make a grave mistake when they give great authority to foolish people and low positions to people of proven worth. I have even seen servants riding horseback like princes—and princes walking like servants!

Matthew 15:14 Let them alone: they be blind leaders of the blind. And if the blind lead the blind, both shall fall into the ditch.

**From:** Pam Callahan [<mailto:pamelac@hotmail.com>]

**Sent:** Monday, September 19, 2016 3:49 PM

**To:** AFFH

**Subject:** Comments on AFFH Plan

Most concerned about:

1) Rental Registry ( Was originally told that the inspections would not be HQS inspections but they will be. This is what Nan McKay does. Will be difficult for small landlords to pass these inspections without some grants or low interest loans and they will need time to make repairs as well. I am referring to landlords who are keeping their rents at reasonable rates but will most definitely pass the fees onto the tenants, just like most of the landlords in our community. This is not furthering fair housing for our low-income tenants. It will cause more problems and more homelessness. As far as our affordable rentals go, apt. complexes that rent a 1-br unit for \$5-\$600 a month, will also pass on fees to tenants. We aren't a big city with a lot of wealthy landlords. I suggest we have funds available for some of the landlords before this process begins and a plan needs to be in place to keep those units at an affordable rate for those receiving assistance, for at least 10 years. )

2) Air bnb I am pleased to hear that the City Planning Commission is not recommending that whole houses be utilized for Air bnb. I am , however, upset that some doubles may be considered eligible. Most of the people who are housed by agencies serving the homeless are placing them in doubles. My fear is that owners will declare that the double is owner-occupied, receive mail there and not live there. They will be able to afford keeping 1 side of the double empty because they will be earning so much money for Air bnb. Every rental unit that is taken off the market for Air bnb is going to worsen our affordable housing crisis. I am also wondering how this will be regulated. Also, are taxes/fees collected going to be used to build affordable housing?

3) Gentrification in many neighborhoods. Where will our low-wage workers live?

4) Inadequate transportation. Since our low wage workers can't afford to live in gentrified areas, which sometimes have better and more frequent transportation, it takes our workers an incredibly long time to get to and from work. A lot of low-wage workers are employed in the hospitality industry and finish work when it is dark outside. Waiting long hrs for a bus at night, if buses are even running, makes them vulnerable to crime, esp. women.

5) Lack of services in some neighborhoods. The Lower 9th Ward doesn't even have a grocery store. Took over 10 years to get a pharmacy. How can people live there without the basics? Many people don't have a vehicle there so they have to buy unhealthy food at overpriced corner stores.

1. Increase livable wages
2. Increase jobs
3. Increase the number of schools rated A or B in high poverty areas
4. Address environmental challenges of low-income due to living near major highways (LPHI)
5. Housing search assistance for disabled (SLLS, Advocacy Center, and STAND)
6. Community land trusts as a goal or tool
7. REO properties
8. Women with children as a protected class with goals dedicated
9. Re-defining high frequency as 15 minutes from transit instead of 30

**From:** Pam Callahan [<mailto:pamelac@hotmail.com>]

**Sent:** Monday, September 19, 2016 3:55 PM

**To:** AFFH

**Subject:** Comments on the plan

Developers of these large apt. buildings should be required to have 10% of their units affordable, 20-30% AMI.

Marilyn Amar Hemphill  
80 Gordon Plaza Dr.  
New Orleans, LA 70126  
(504) 975-3415  
[amarmarilyn@gmail.com](mailto:amarmarilyn@gmail.com)

September 21, 2016

To the GNO Fair Housing Committee,

I am asking the City of New Orleans to buy me out of my property - 80 Gordon Plaza Drive - at its fair value, as the land filled with toxins related to the Agriculture Street Landfill Superfund site. I cannot afford a mortgage, so I am asking to be bought out at a FAIR VALUE. I need to purchase a home without a mortgage.

I am a 65-year-old retiree from Bell South who has worked 30 years to provide a safe and comfortable home for my family. Only to learn that the property that I purchased at 80 Gordon Plaza Dr., New Orleans, LA 70126 was built on top of a toxic landfill.

Before I purchased the property at 80 Gordon Plaza Drive, I was not told about the toxins on the land.

**The City of New Orleans is responsible for making sure citizens have clean, safe streets. The City of New Orleans should use housing dollars to clean up the area and ultimately move us out of this area that has been likened to a "zombie apocalypse." Also, the City of New Orleans lost a lawsuit indicating they were directly responsible for the oversight allowing this land to be inhabited by its citizens.**

In 1994 when the EPA released a report that the area, which we lived on for most of our lives, was contaminated and had 49 cancer causing agents, my worries grew. One of my sons, Arlester, contracted an internal disease called Crohn's Disease and I have been worried, angry, and disappointed that his illness could very well be due to the toxins in the soil of the land we lived on. He suffered long nights and bouts of pain so unbearable that he could not sleep. Nor did he want to eat because the pain would be so great after eating. He also received a medical discharge from the US Army because of this. The end result was that my son had to have his colon removed (ileostomy) because it would eventually cause cancer.

The EPA came in to do soil replacement. During this process they had their employees to wear protective gear, but offered no protection for my family. It seems that we would have been moved from our property until the work was completed. But instead the EPA protected their folks, turned the soil in our presence and did nothing to assure that we would not be exposed. They told us that we would be responsible for replacing any of the barriers if damaged, thus removing responsibility from the EPA. I feel that they were not fair, nor did they do anything substantial to protect us from future exposure.

I am asking the City of New Orleans to buy me out of my property at fair value, because this land is still filled with toxins.

Regretfully,

  
Mariyn Amar Hemphill

September 24, 2016

To: Affirmatively Furthering Fair Housing

From: Samuel Egana  
2891 Abundance Street  
New Orleans, LA 70126

RE: Relocation from Agricultural Landfill Site

My name is Samuel Egana and I have lived at 2891 Abundance Street for 35 years. My wife, Betty Egana (deceased) and my daughter, Monique Egana occupied our home with me. We moved there in July, 1981. In 1994, our community found out that our homes had been built on top of a landfill that was used for dumping and had over 140+ toxins that were cancer carcinogens. This information jolted our quality of life and our daily enjoyment in our home and its surrounding. I believe the city of New Orleans is responsible for my family and me moving on top of this land because we bought our home without knowing that the land was once a landfill filled with 140+ contaminants that would later cause cancer and many health issues.

I lost my wife in June, 2012 to cancer, multiple myeloma which has been linked to chemical exposure according to research. My wife suffered and my daughter and I did too watching her suffer knowing that we could not stop the pain that we believe was created and caused as a result of the 140+ cancer carcinogens on our land. I often wonder had we never moved here or had the city and EPA agreed to relocate us years ago my wife may still be alive enjoying life with my daughter and our grandchildren. I have waited and hoped for years that the City of New Orleans and the powers that be that were all responsible for this injustice to make it right and after 35 years the injustice still exist.

My plea is that I be relocated from this toxic site and that an injustice be made right after 35 years. It's long overdue.

Sincerely,

Samuel M. Egana

A handwritten signature in black ink that reads "Samuel M. Egana". The signature is written in a cursive style with a large, sweeping initial 'S'.

Lydwina M. Hurst  
2926 Benefit St.  
New Orleans, La. 70126

September 25, 2016

Dear GNO Fair Housing Committee,

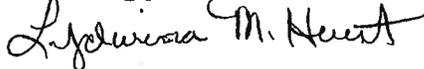
I am a resident, homeowner in The Gordon Plaza Subdivision. My home is located on the Agriculture St. Landfill Superfund Site. The land is filled with toxins.

Prior to Katrina the EPA came in to clean up the site, which was a bandage approach. There were homeowners who did not agree to the process. Therefore the land around those homes was not touch, so the cleanup was not complete. All workers were dressed in protective clothing. Residents were not relocated while this process was being done. This process cost the government millions of dollars, far more than the cost of buying residents out at fair market value as requested.

I am a single, taxpaying, senior citizen, who cannot afford to purchase another home or pay a mortgage. Residents of this community have been discriminated against. The Federal Government and Local officials have ignored our pleas.

I am asking the GNO Fair Housing Committee to take this matter into consideration. I am requesting the Federal Government to buy me out at fair market value.

Thanking you in advance.



Lydwina M. Hurst

Shannon Rainey Blanco  
2876 Abundance Street  
New Orleans, La 70126  
(504) 416-8225

I am still a resident of the Agriculture Street Landfill Superfund site in the **Gordon Plaza Residents surrounding communities**. I believe that the current allocation does not adequately satisfy the emotional loss and distress, I have suffered as a result of my residency in the community built on the ASL. I, like others of the my family who lived in the community, have been displaced as members of the community and have lost homes, endured the emotional trauma of being or having sick loved and/or deceased loved ones and the probability of future health concerns. Collectively, we can never recoup the homes and the community we called home for generations because the community was meant to sustain us is a significant environmental and personal hazard.

As a result of having lived and continuing to live in the community now deemed a superfund site, my health concerns are supported by assessments of the Centers for Disease Control (CDC) and other federal agencies that my exposure and that of my family constitutes a real and significant health risk. I and my family live with the probability of impending health conditions (cancer, longterm neurological effects due to organic and heavy metallic wastes and other undefined and related illnesses subsequent to living on the ASL site) that may result from my exposure to the toxic and hazardous substances. I cannot predict the health outcomes from exposure to the many toxins for substantial parts of our lives and that contributes to significant mental anguish and fear of what the future holds for my health and that of my family.

Secondly, I live in a community that was African American, poor in which a large proportion of its members who have low literacy and access to the means to be sufficiently informed in order to voice our concerns and to participate in the judiciary process. The lack of access to information as well as the inability to participate fully in this process that concerns my life and well being and that of my family has been a significant source of frustration, sadness and pain throughout the years of this litigation.

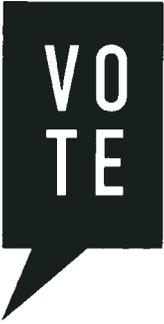
I and my family feel that the allocation amounts should reflect our significant fears, frustrations and continuing concerns. I also know that no award could ever replace or repair what has been or at risk, but only serve as a means of better managing the real life consequences of having been subjected to the negligent and unwarranted violations I have suffered as member of the community that is a superfund site. It is my hope that the court take all of these factors into account when reassessing the allocations and award me and my family the maximum amount allowable in accordance with the ruling in these proceedings. I and my family thank you for your consideration.

**Relocation, Relocation, Relocation, Relocation,**

Sincerely,



Type your name here



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E: info@Vote-Nola.org

Vote-Nola.org

Office of Community Development  
C/o Planning & Resource Development Unit  
1340 Poydras Street, 10th Floor  
New Orleans, Louisiana 70112

Housing Authority of New Orleans  
C/o Strategic Planning Department  
4100 Touro Street,  
New Orleans, LA 70122

Re: Draft 2016 Fair Housing Assessment

Sept. 25, 2016

Dear Sirs and Madams,

It is with a spirit of hope and positivity that VOTE engages in the City's recent efforts to overcome our housing crisis in New Orleans. The most recent commitment to affirmatively further fair housing needs to be a staple of every city official, as we attempt to overcome the historical forces and choices that have led us into an unsustainable situation. To make changes, it helps to begin with an honest assessment of how we got in this situation, and acknowledge that we dug this housing hole through choices. We cannot change the choices of the past; however, the problematic histories of our agencies should inspire those of us who seek change to double our efforts.

The draft 2016 Fair Housing Assessment includes many important elements. We would like to see more, including:

1. The framing needs to include the direct impacts of the criminal justice system, the economy, and racism have had on housing discrimination.
2. Future data collection must account for these impact factors.
3. Goals must incorporate a response to the criminal justice system destroying our communities.

**1. The Fair Housing Plan needs a more complete contextual framework**

***a. We need a reversal of legal discrimination through convictions.***



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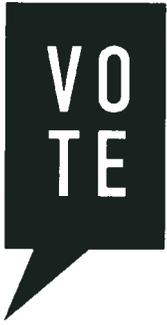
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- The Plan fails to adequately acknowledge the role our criminal justice system has played in the disruption of households. This, in turn, leads to an unacceptable set of recommendations regarding this government-created and government-perpetuated dilemma.
- ***Criminal records are now a proxy for race.*** At every point of discretion, from police deployments to finding employment with a criminal record, statistics show disparate outcomes by race. This is no longer a controversial statement.
- ***The use of criminal records as a legal basis for discrimination*** compounds the problem of the criminal justice system being inequitable.
- The Plan should acknowledge that while a person is arrested and charged with a crime or a probation violation, they are likely to lose their job and their home within days or weeks. If convicted, they are more often released to probation than sent to prison. They will likely have several thousand dollars in new debt with the threat of jail for not paying. They face the threat of not being able to be on a lease, not being able to find work, and not being eligible for food stamps. Limitations created by federal and state agencies during the 1980s and 1990s have only recently been acknowledged as a failure and disrupting communities. They were as much a failure on the first day, yet their impacts have been several generations deep. Now, it is typical for a child to have a parent who is paying the criminal justice system, either locked inside or discriminated against for life. When that child faces additional challenges, and fails, the City is often a harsh punisher.

#### **b. The economy plays a role**

- Although New Orleans' timeline is often labeled as pre- and post-Katrina, the city's current obstacles were not all created by an act of nature. The Plan should acknowledge the peak population from 1950-1980 was nearly 600,000 people. The shrinking of the city corresponds with an economy where automation has replaced a considerable amount of labor, and outsourcing has eliminated jobs. The inability to properly house two-thirds of that number is a man-made phenomenon, and the choices to not create the appropriate amount of affordable units (particularly with the FEMA money post-Katrina) have not served the people of the city who are struggling.



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- While job opportunities in New Orleans have shrunk, the criminal justice industry has risen. The political pressures to have a large criminal justice budget is easily exemplified by the struggle to rebuild the local jail and the contracts to service the jail, such as food, health care, laundry, and bail bonds.
- Where jobs are few, people will turn to other means for survival. This vicious circle creates many opportunities for incarceration and disruption.

***c. Racism is a clear factor to overcome***

- The criminal justice system arguably does as much (or more) to disrupt and displace families as all the other forces listed in the Plan (transportation gaps, et. al.) combined. Prior to launching the war on communities known as the “War on Drugs,” in 1973, the number of New Orleans residents in prison could be counted in the hundreds. Structural racism served (and continues to serve) as a foundation upon which an industry has spawned. As tax dollars flow towards these occupations, contracts, political fiefdoms, and corporations, nearly every agency and political subdivision has played a role in oppressing Black and poor communities.
- The criminal justice system is directly descended from the Convict-Lease Labor system, which was a result of abolishing slavery except where someone is convicted of a crime. Any impacts based on a race-based system will themselves be race-based.
- An example: Although drug use is highest among college students in the city, the overwhelmingly White students have little to fear of arrest. They also can expect the criminal justice system to factor in the role a conviction may play in their college and professional future. Neighborhoods with the most aggressive policing, (overwhelmingly Black) however, do not experience the same protection or concern.

***2. Data collection should include drivers and effects of discrimination against an unprotected class.***

- Regardless of our political leaders’ desire to make people with convictions into a class protected under civil rights anti-



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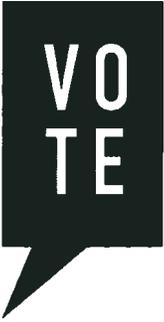
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discrimination laws, this form of discrimination needs to be tracked and reported.

- The Plan should include a calculation on the money spent per neighborhood on a caged housing plan over the past several decades. The outcomes of poverty, unemployment, substance use and abuse, mental illness, homelessness, and stress have been addressed through a highly funded program: the criminal justice system. This system has “housed” tens of thousands of local people who would otherwise be living in the city. This plan continues to be chosen over other plans.
- Last year, 99% of the children arrested in New Orleans were Black. This is practically statistically impossible. All criminal justice statistics leading to housing discrimination should account for race.
- HANO data collection regarding the new background check policy must be robust and applicable to all housing providers.

### ***3. Further Recommendations.***

- **The City should not do business with any landlord or employer who does not adopt the HANO criminal background check policy and the 2012 EEOC guidance on background checks in employment.** As shepherds of the People’s money, this is one of the primary mechanisms for adjusting our values and culture. These agencies’ recent developments do not end discrimination, but they do move us in a more inclusive direction and draw attention to a massive problem.
- The Plan should recommend the court system conduct mandatory ‘Katrina Inquiries’ before passing judgment, particularly on young people who were mere children when losing all of their belongings and having their families dispersed, and not having the supports to restore a sense of stability. Some of these people were rendered homeless for months and years, and this housing disruption creates lasting impacts on each individual.
- The Plan should recommend the criminal justice system as a whole work towards racial equity. For instance, calling for equal enforcement of drug war laws and a mantra of “prison as a last, and rare, option.”
- The Plan should recognize that data on people disrupted by the criminal justice system will be underrepresented. People with



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convictions are considered “out of the workforce” rather than unemployed. People “crashing” at a friend’s apartment while attempting to get their lives on track are not on any waiting lists for Section 8 vouchers.

- The Plan needs to acknowledge that landlords are conducting background checks on a routine basis, and at this time, discrimination against this unprotected class is rampant. The City needs to create an accurate way of collecting data on this discrimination.
- The Plan should acknowledge that the City has not provided adequate reentry housing, family reunification, and alternatives to incarceration. The City has, however, come a long way in learning from directly impacted people making demands upon the government. Finally, the City should state clearly that it intends on providing leadership moving forward, working with impacted communities towards positive outcomes. For example, VOTE’s work regarding HANO’s background check policy was not openly supported by the City for three years. Directly impacted people have been desperately calling for changes by HUD and HANO for decades, yet these voices have been competing with other pressures to continue the divisive and disruptive policies of exclusion.
- In June, the Mayor’s report, “Housing for a Resilient New Orleans,” planned to: “Issue a ‘call to action’ to private landlords to adopt HANO’s background check policy as part of their rental application process, and support public education to landlords about adopting this policy.” (p. 17). This, at a minimum, should be included in the AFFH plan, as it addresses the systemic discrimination by corporate developers and others who seek to profit off of people’s basic need of shelter.
- Currently, the Draft Fair Housing Assessment only calls for the HANO background check policy to be implemented. To reach that goal, it should include the corporate developers who believe they are immune from the policy priorities of New Orleans’ citizens, and can legally continue to discriminate.

Whereas New Orleans must increase the number of available affordable units in the city, and decrease the discrimination against families with a criminal conviction, the city must lead by example. It will take nothing short



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of a cultural shift to dispel the “Us v. Them” mentality that ostracizes our own community members. We look forward to continue our work with government agencies so we can make the tough choices required to move forward.

Sincerely,

Norris Henderson  
Executive Director



WORLD CLASS TRANSIT FOR NEW ORLEANS

RIDE NEW ORLEANS

504 345 8360

Po Box 19231

New Orleans LA 70179

Date: September 26, 2016

To: City of New Orleans and Housing Authority of New Orleans

From: Ride New Orleans

Re: Comments on draft Assessment of Fair Housing plan

---

Please accept the following comments from Ride New Orleans on the draft Assessment of Fair Housing plan.

Ride New Orleans is a 501(c)3 organization dedicated to bringing world class transit to New Orleans that creates a more equitable, sustainable, and resilient city. Our website is [rideneworleans.org](http://rideneworleans.org).

Transportation policy in general, and transit accessibility in particular, are our focal points. Thus we submit our comments in the hope that they can help by ensuring not only more housing that is affordable for all residents, but ensuring that all residents are able to afford housing near convenient and affordable transportation choices that provide easy access to jobs and other important opportunities throughout the region.

The New Orleans poverty rate is 28 percent and the average nationwide cost of owning and operating a car, based on a 2015 AAA study, is \$8,698. Ensuring more fair housing opportunities in New Orleans is critical, but the job will remain incomplete unless we also focus on ensuring more affordable housing near convenient and reliable transportation choices – especially transit – and ensure that transit can conveniently connect riders with opportunities throughout our region.

With that in mind, we respectfully suggest the following additions to the Goals and Priorities in order to strengthen this draft and make it more likely to significantly help a higher number of New Orleans residents in the coming years:

- **The City, the New Orleans Redevelopment Authority (NORA), the City Planning Commission (CPC), and the Housing Authority of New Orleans (HANO) should coordinate closely with the New Orleans Regional Transit Authority (RTA) during the RTA's upcoming strategic transit planning process.** In that process, the RTA will define our primary transit corridors in the coming years. City agencies should be directly involved in this process, making sure that RTA and City definitions of primary transit corridors match in order to properly prioritize transit service enhancements. When

these corridors are in high-opportunity or gentrifying neighborhoods, they should also be prioritized for affordable housing development and up-zoning paired with mandatory inclusionary zoning. This addition could be inserted in either Goal One or Goal Seven.

- **The City should consider better defining "high-frequency" with regard to transit.** In Goal One, the draft plan prioritizes putting affordable housing on public land "on parcels within a quarter-mile of any high frequency transit stop." The draft plan defines "high frequency" as 30-minutes-or-less. We appreciate and support investing in more affordable residential development along these corridors, but we also worry that by defining "high frequency" as 30-minutes-or-less, we risk setting the frequency bar too low and therefore accepting subpar transit service.

Most major US metropolitan areas define high frequency as 15-minutes-or-less - with an emphasis on much less in some cities. The 15-minutes-or-less level of frequency is seen as the level at which transit is considered a reliable option that can provide the service needed to give riders convenient access to jobs and other opportunities.

We recognize that there are currently not enough 15-minutes-or-less lines in the RTA's system and that 30-minutes-or-less must be a shorthand for high frequency transit. But we recommend that we prioritize achieving 15-minute-or-less frequency in all primary transit corridors and that this plan push that goal as a key part of equitable transit. This addition could be inserted as a metric in Goal One.

- **City, NORA, HANO, Industrial Development Board, and New Orleans Business Alliance should coordinate economic development incentives to match high-frequency transit corridors, jobs centers that are currently easily accessible via transit, and affordable housing investments.** Ultimately, transit relies on having an economy-of-scale to work. The more that jobs are clustered near each other with easy access to other parts of the city and region, the easier it will be for residents without a personal vehicle to access a growing number of opportunities. This addition could be added as a metric to Goal One.
- **Achieve one million vehicle revenue hours by the end of 2020.** Frequent, reliable service is the foundation for a quality transit system. That's why Ride New Orleans is calling on the Mayor, City Council, and RTA Board of Commissioners to prioritize reaching one million vehicle revenue hours (VRH) – the amount of time a transit vehicle is actively serving paying customers – by 2020. This represents an approximately 33 percent in service from mid-2016 levels and should be achieved by expanding bus service, which covers much more of the city and region than streetcar service. This level of service will make it possible to restore frequent transit service to the majority of New Orleans neighborhoods and workers, putting better job and housing opportunities within easier reach. This addition could be added as a metric to Goal Seven.

We are more than happy to speak further about any of these recommendations if there are any questions or comments. We appreciate your work on behalf of New Orleans residents and are

very pleased with this very detailed and progressive plan and look forward to continuing to work together to create a more equitable and sustainable city and region.

Sincerely,

A handwritten signature in black ink that reads "Alex Posorkse". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Alex Posorkse  
Executive Director  
Ride New Orleans

September 26, 2016

To Whom It May Concern,

The National Fair Housing Alliance would like to provide you with some information regarding bank-owned, vacant foreclosed properties in New Orleans. We understand that your jurisdiction is currently in the process of drafting a new Assessment of Fair Housing and we hope that you will include the data and recommendations contained in this letter as you complete this component of your obligations under HUD's Affirmatively Furthering Fair Housing mandate.

Since 2009, the National Fair Housing Alliance and 22 of its fair housing center partners have been investigating the ways in which the nation's financial institutions are failing to maintain their real-estate owned (REO) properties in African American and Latino neighborhoods. The Greater New Orleans Fair Housing Action Center has been involved in these investigations since 2013.<sup>1</sup> Unfortunately, in New Orleans we have observed the same discriminatory treatment of bank-owned vacant foreclosures that NFHA and the other partners have documented in other communities. During the investigation, we looked at over 30 different aspects of the maintenance and marketing of each REO property. Some of the national disparities include:

- REO properties in neighborhoods of color were 2.2 times more likely to have significant amounts of trash and debris on the premises compared to REO properties in White neighborhoods;
- REO properties in neighborhoods of color were 2.3 times more likely to have unsecured, broken, or damaged doors compared to REO properties in White neighborhoods; and,
- REO properties in neighborhoods of color were 2.1 times more likely to have holes in the structure of the home compared to REO properties in White neighborhoods.

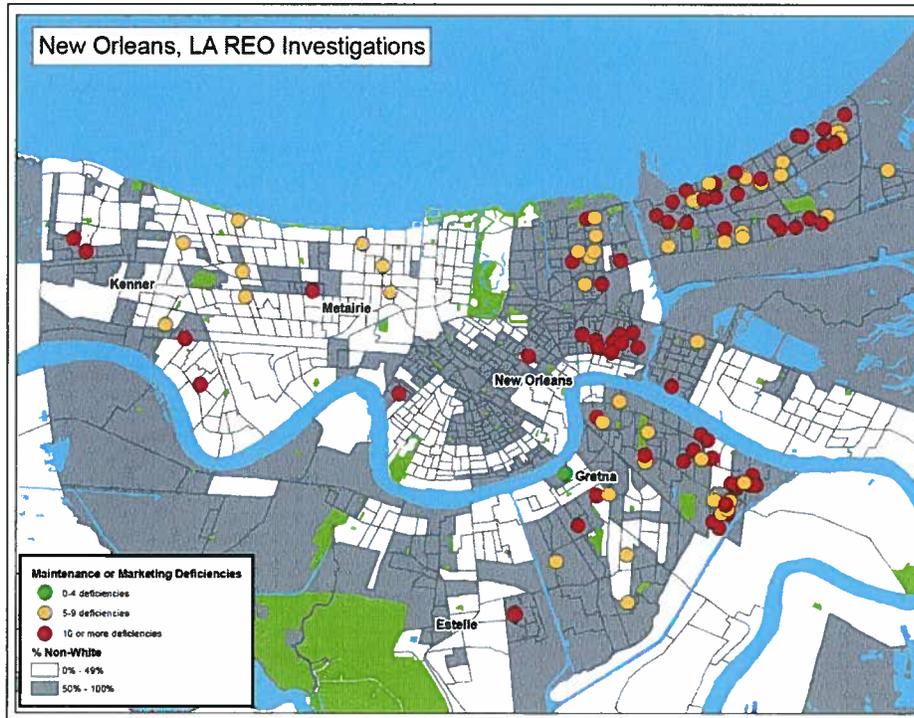
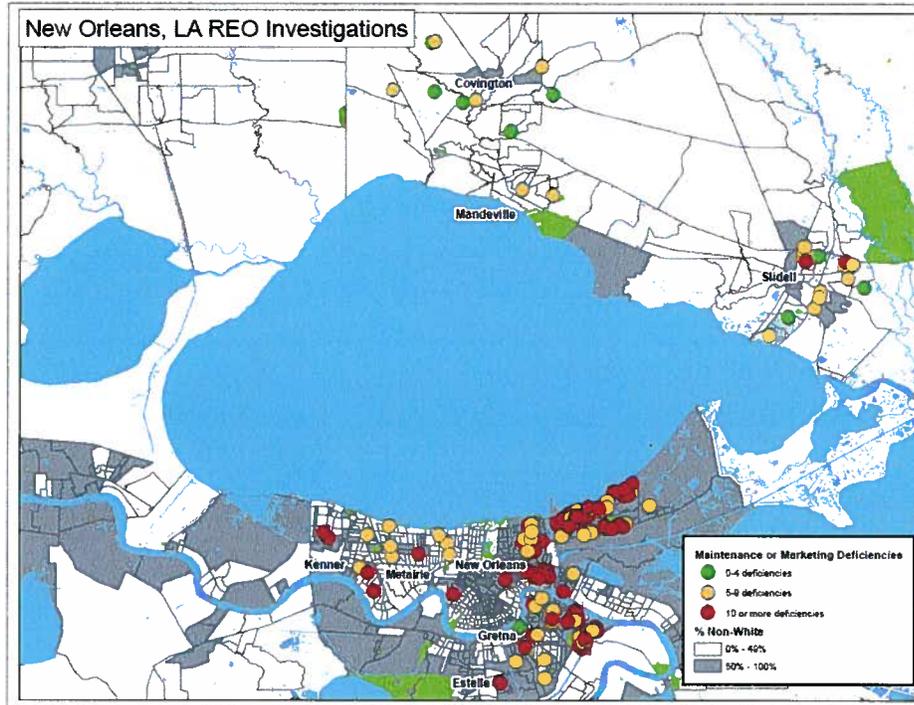
In New Orleans, we found similar disparities that were deeply distressing. A total of 6 lenders, including Bank of America, Deutsche Bank, Fannie Mae, and US Bank were investigated and some of the more egregious disparities found in this area include:

- REO properties in neighborhoods of color were 3.0 times more likely to have significant amounts of trash and debris on the premises compared to REO properties in White neighborhoods;
- REO properties in neighborhoods of color were 2.6 times more likely to have overgrown or dead shrubbery compared to REO properties in White neighborhoods; and,
- REO properties in neighborhoods of color were 3.4 times more likely to have holes in the structure of the home compared to REO properties in White neighborhoods.

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<sup>1</sup> The details of this investigation are included in the 2014 report "Zip code Inequality: Discrimination by Banks in the Maintenance of Foreclosed Homes in Neighborhoods of Color."





The National Fair Housing Alliance (NFHA) is the voice of fair housing. NFHA works to eliminate housing discrimination and to ensure equal housing Opportunity for all people through leadership, education, outreach, membership services, public policy initiatives, advocacy and enforcement.



These deficiency maps show the severity of the discriminatory marketing and maintenance of REO properties in communities of color in New Orleans. In the city of New Orleans there is not a single property in an African American or Latino neighborhood that was well maintained with less than five deficiencies. While the map extends outside of New Orleans' city limits, the banks' failure to maintain REO properties in communities of color is occurring in New Orleans proper at an alarming rate. Further, the deplorable maintenance and marketing of REO properties in New Orleans in contrast with properties in White communities in the greater New Orleans region depicts a troubling pattern of discriminatory treatment that is consistent with our nationwide investigation.

This type of discriminatory neglect of vacant properties by the nation's major financial institutions serves to exacerbate residential racial segregation and deepens the problem of blight that is already so costly to both local government and homeowners residing next to these vacant homes. As you know, jurisdictions often shoulder heavy costs related to code enforcement and nuisance abatement around vacant, neglected foreclosures, even while operating with a depleted property tax base precisely because of the very same foreclosed properties are driving down property values of neighboring properties. They increase health and safety concerns for neighbors, including increasing the rates of insect-borne diseases like the Zika virus, allowing breeding grounds for pests and mold, creating dangerous spaces for criminal activity, and generally reducing the quality of life of neighboring residents. By neglecting to maintain and market their REOs properly, particularly in communities of color where such properties are already heavily concentrated, banks extend the amount of time a property remains vacant and increase the likelihood that it will become a source of additional blight in your city.

We encourage you to include this issue in your Assessment of Fair Housing and to do everything within your power to hold banks and other financial institutions in possession of these REO properties accountable for the way that they maintain their properties in your city. We also encourage you to utilize any funds that you obligate to address vacancy, blight, and foreclosure issues in a way that not only abides by fair housing laws, but also furthers fair housing goals and promotes residential diversity.

We recommend the following strategies to address the discriminatory maintenance and marketing of REO properties in New Orleans and we suggest you include them your Assessment of Fair Housing.

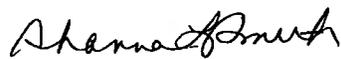
- (1) Conduct or fund an analysis of the extent to which financial institutions are equitably maintaining or marketing bank-owned properties.
- (2) Avoid labeling or targeting certain communities or neighborhoods as more befitting of a bulk sales or investor purchase strategy to address vacant properties and foreclosures.
- (3) Promote the sale of bank-owned REO properties to owner-occupants over investors. This may include developing local laws that give prospective owner-occupants and non-profit community organizations greater opportunity to purchase foreclosed homes before they are available to the rest of the market.



- (4) Establish robust vacant property registration requirements and maintenance laws that require banks, investors, and/or servicers to provide transparency regarding the ownership and servicing of REO properties in your city. Ensure that this data is publicly available to local groups and neighborhood associations so that they may monitor marketing and maintenance.
- (5) Review carefully all strategies to address blight and vacant or abandoned properties, including the application of code enforcement and decisions regarding pushes for demolition and rehabilitation, to ensure that there are adverse impacts for the city's residents of color.

Thank you for considering these findings and recommendations. Please let us know if we may provide any further background information or if you would like to discuss these recommendations further.

Sincerely,



Shanna L. Smith, President & CEO  
National Fair Housing Alliance



## Shelley Smith

---

**From:** AFFH <AFFH@nola.gov>  
**Sent:** Thursday, September 29, 2016 1:06 PM  
**To:** Ellen M. Lee; Shelley Smith; Jessica Knox  
**Subject:** FW: AFH Comments

**From:** Ethan Ellestad [mailto:coordinator@maccno.com]  
**Sent:** Monday, September 26, 2016 3:36 PM  
**To:** AFFH  
**Cc:** h.kreiger.benson@gmail.com  
**Subject:** AFH Comments

Fair and affordable housing is something that the Music and Culture Coalition of New Orleans cares deeply about. As you likely know, the roots of New Orleans culture are found in working class, traditionally African American neighborhoods--the same neighborhoods that are under increasing threat of gentrification and displacement.

As housing costs continue to trend dramatically upward, we are seeing increasing signs of distress in the cultural community. Based on our ongoing survey, musicians are only making between 5 and 10% more than they were 5 years ago--which means they now make an average of around \$20,000 a year. Increased housing costs in the historic core of the City have pushed many to areas like New Orleans East or the West Bank--places where public transportation is limited, particularly late at night. This is particularly problematic for musicians who do not own cars, as most gigs take place at night in neighborhoods like the Marigny or in smaller cultural destinations like Oak Street, and are not readily accessible via bus or street car (and living in close proximity to these opportunities is tough, as affordable housing in short supply). Furthermore, the rapid gentrification of neighborhoods like Central City and the 7th Ward are putting traditional neighborhood based cultural practices like second line parades at increasing risk. If New Orleans wants to keep its culture, we need affordable places for our culture bearers to live in their historic neighborhoods, period.

We strongly encourage the inclusion of policies that directly combat gentrification and displacement, particularly the establishment of targeted, permanent affordable housing within these neighborhoods. This needs to be done proactively, before new development pushes up housing prices and rent. We would also like to see a yearly cap on property tax increases for long term neighborhood residents.

In addition, we also wanted to express our support for the suggested rental registry (with a non-retaliation clause added), the redevelopment of the HANO scattered sites as affordable housing, and the inclusion of mandatory inclusionary zoning in high opportunity neighborhoods.

Thank you,

Ethan Ellestad  
Executive Director  
Music and Culture Coalition of New Orleans  
504-327-7713  
[coordinator@maccno.com](mailto:coordinator@maccno.com)

**From:** Guenevere Hoy [<mailto:ghoy@lphi.org>]  
**Sent:** Monday, September 26, 2016 1:24 PM  
**To:** AFFH  
**Subject:** AFFH comments for HANO plan

Greetings,

Attached you'll find integral comments that myself and a colleague gathered to better inform the links between housing and health addressed in the draft AFFH plan. We hope these comments will be considered and incorporated into the final AFFH plan. Thank you for your time and please contact me with any questions you may have.

Best,

**Guenevere Hoy, MPH**  
Program Coordinator  
Louisiana Public Health Institute  
1515 Poydras Street, Suite 1200  
New Orleans, LA 70112  
Direct: (504) 325-2682  
Cell: (504) 320-5642  
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[www.lphi.org](http://www.lphi.org)  
"Bringing People, Ideas, and Resources Together"

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### **Regarding Access to Healthcare (pg. 64-65) & Public Health Evidence for Goal #6 (pg. 117)**

The racial health disparities and vast discrepancies seen in life expectancy between neighborhoods within New Orleans and listed on pages 64-65 of the AFH can be attributed to several causes. According to the Center on Society and Health at Virginia Commonwealth University, gaps in health across neighborhoods can stem from the following reasons:

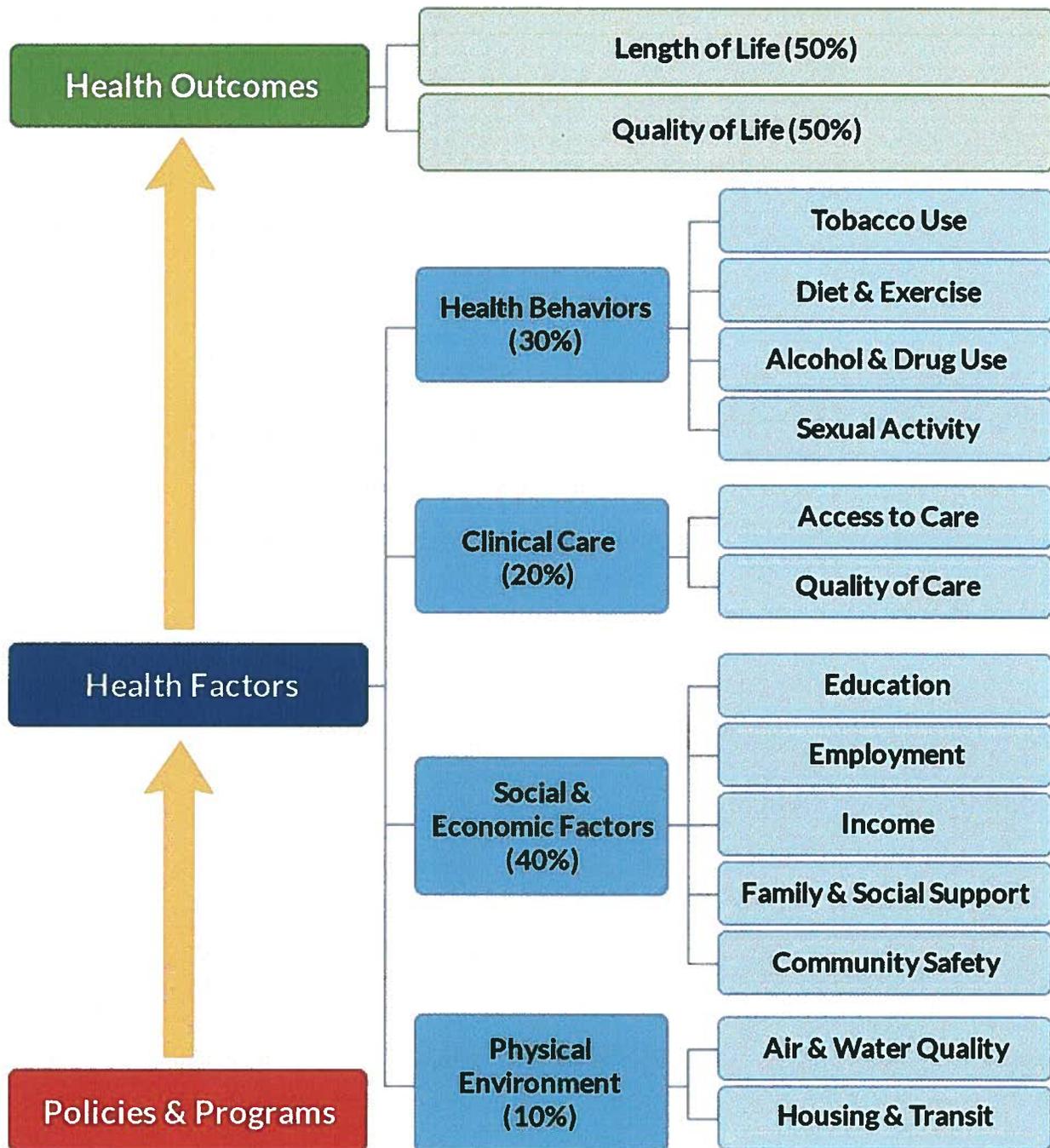
- Neighborhoods lacking in educational and economic opportunities for residents are also neighborhoods with weak tax bases, which further limits the financial resources needed to support higher-quality schools and does little to encourage future employers to invest in these areas.
- Unsafe or unhealthy housing can also generate health hazards (e.g. allergens such as mold and rodents, overcrowding, etc.) Additionally, proximity to highways, factories, or other sources of toxic agents may expose residents to pollutants.
- Neighborhoods that offer limited opportunities to exercise, walk, or cycle, or suffer from high rates of crime can also negatively impact residents' health.
- Unreliable or expensive public transit can isolate residents from good jobs, health and child care, and social services.
- Residential segregation and features that isolate communities (e.g., highways [that bisect neighborhoods, cutting off residents from other assets in the city]) can limit social cohesion, stifle economic growth, and perpetuate cycles of poverty.

Taken together, the above issues result in poor living conditions that produce chronic stress. Chronic stress itself is associated with a higher likelihood of being uninsured and suffering from conditions such as obstructive pulmonary disease, heart disease, and diabetes.<sup>1</sup>

Furthermore, it is widely acknowledged in the field of public health that factors related to clinical care, such as access to clinical services and quality of care only contribute around 20% of a community's health—compared to social and economic factors, like education, employment, and community safety, which contribute approximately 40% to a community's well-being (see Figure 1). While housing and transit is considered part of the physical/ built environment within the model and contributes only 10% to a community's health, the location of one's home has wide-ranging effects on nearly all social and economic factors, which have the greatest impact on one's health.

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<sup>1</sup> Weissman J, Pratt LA, Miller EA, Parker JD. Serious psychological distress among adults: United States, 2009–2013. NCHS data brief, no 203. Hyattsville, MD: National Center for Health Statistics. 2015. Retrieved from <http://www.cdc.gov/nchs/data/databriefs/db203.pdf>



County Health Rankings model © 2014 UWPHI

Figure 1: County Health Rankings and Roadmaps Approach Model

## Public Health Evidence for Goal #2 (pg. 114)

In short, communities can't really improve poor health outcomes among low-income, minority residents without tackling issues like fair housing, living wage, equitable access to high quality child care & universal pre-k, etc. *Without these larger strategies*, no amount of clinical interventions, health insurance coverage, and health education provide us with population-wide reduced mortality and morbidity from common chronic diseases, preventable violence & injury, etc., and **this approach is in direct support of Goals #1 and #2**. For further illustration, see the U.S. Centers for Disease Control and Prevention's (CDC) Health Impact Pyramid (Figure 2), which shows that the public health interventions with the largest impact are the ones that address poverty, education, housing, and inequality.

The Health Impact Pyramid also serves as a framework for CDC's Health Impact in 5 Years (HI-5) initiative (Figure 3), which highlights 14 evidence-based community-wide approaches that are known to demonstrate positive health impacts within five years and are cost effective / generate cost savings over time. Financial supports for low-income homeowners, such as home improvement loans and grants, ensure safe and habitable homes, and are one of the 14 mechanisms chosen by CDC as a means to improve population health. Similarly, home improvements around air quality (i.e. dampness and mold) and energy efficiency (i.e. weatherization and insulation) have been tied to improved health outcomes for respiratory health, mental health and general health status, as well as, reduced number of visits to general practitioners. These health improvements can extend beyond homeowners to renters as well, who are more likely to be low-income and more likely to be effected by unhealthy housing conditions according to the CDC's HI-5 initiative.

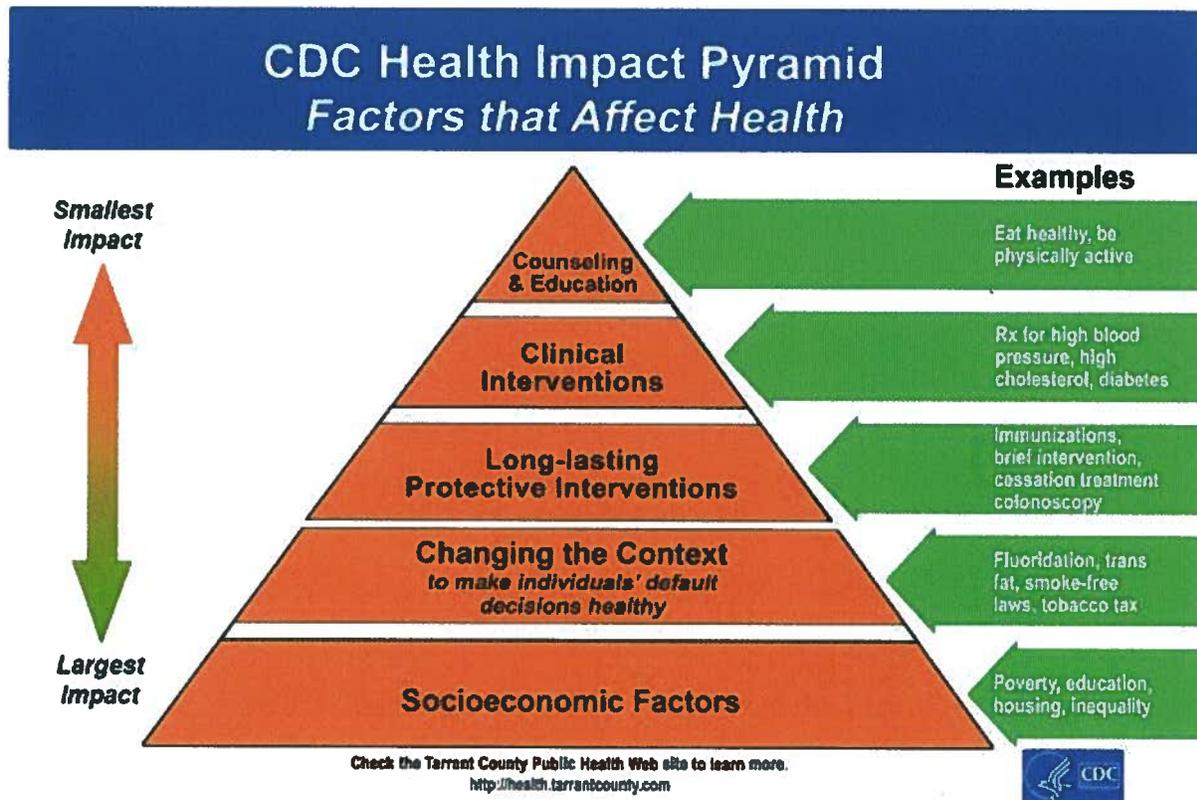


Figure 2: CDC Health Impact Pyramid

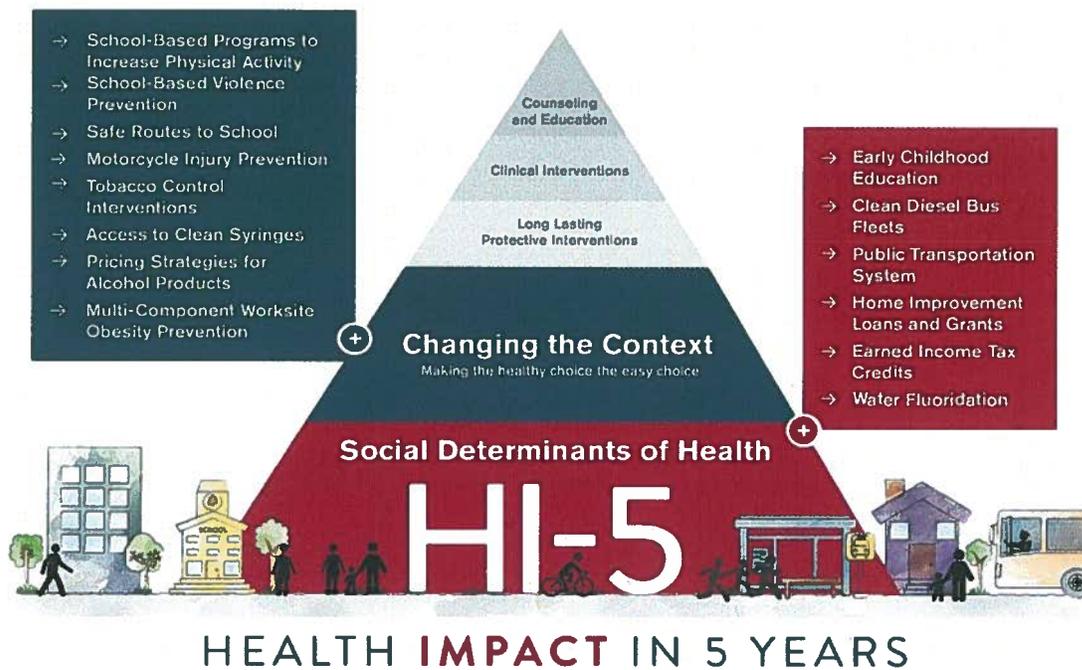


Figure 3: CDC HI-5 Interventions

### Regarding Environmental Health Challenges (pg. 61-63)

New research has shown that residents who live near major highways and are exposed to ultrafine particles spewed from vehicles and have higher risks of cardiovascular disease, even when controlling for variables such as body mass index, smoking, and race/ethnicity, which are all known to be risk factors for cardiovascular disease.<sup>2,3</sup> Furthermore, high concentrations of ultrafine particles—which are 500 times smaller in diameter than the width of a human hair—are just as toxic as larger particles. Given their smaller size, these particles penetrate into the bloodstream, causing inflammation and elevated cholesterol levels. Chronic exposure can result in plaque buildup in the arteries, eventually resulting in a heart attack or stroke.<sup>4</sup>

In New Orleans most neighborhoods adjacent to major highways are majority low-income people of color, with many of them meeting the threshold of R/ECAPs.

<sup>2</sup> Lane, K. J. et. al. (2016). Association of modeled long-term personal exposure to ultrafine particles with inflammatory and coagulation biomarkers. *Environment International*, 92-93, 173 – 182.

<sup>3</sup> Boston University School of Public Health: <https://www.bu.edu/sph/2016/04/25/living-near-highways-raises-risk-of-heart-attacks-strokes/>

<sup>4</sup> Herro, C. (2016, April 15). Living Near A Highway Is Terrible For Your Health. 1 In 10 Americans Do It. Retrieved from <https://thinkprogress.org/living-near-a-highway-is-terrible-for-your-health-1-in-10-americans-do-it-f6359360c70e#.mpzcg2qo1>

**Educational opportunity (pgs. 46-53):**

An update to pg. 47 regarding suspension rates:

According to the GNO Data Center report on public education in 2013 14% of all African American students were suspended or expelled compared to only 4% of White students and 4% of all other students. In the same year, out-of-school suspensions accounted for 87% in New Orleans compared to 39% in all other parishes in the state. Expulsion has undergone a process of reform and now has a centralized response through the Student Hearing Office for both OPSB and RSD schools. All expulsion hearings go through this centralized process and there is a common list of expellable offenses for all New Orleans public schools. No such centralized process exists for suspensions.

([http://www.datacenterresearch.org/reports\\_analysis/school-transformation/](http://www.datacenterresearch.org/reports_analysis/school-transformation/) )

Policies affecting ability to attend a proficient school (pgs. 50-52):

In the 2013-2014 school year 70.93% of OPSB students were African American compared to 93.41% of RSD students. Comparatively 16.25% of OPSB students were White and only 5.69% of students were Hispanic. While RSD students were 1.54% White and 4.05% Hispanic. Keeping in mind that OPSB schools are largely A and B rated schools and disproportionately located in more affluent neighborhoods (for the 2013-2014 school year 83% of OPSB schools received an SPS of A or B compared to 11.3% of RSD schools). In this supposed open enrollment and school choice environment segregation is still apparent.

(<http://www.louisianabelieves.com/resources/about-us/10-years-after-hurricane-katrina> - see

enrollment counts by race, special education, SES and ELL status and

<http://www.louisianabelieves.com/docs/default-source/katrina/2013-2014-sps.xlsx?sfvrsn=2> for SPS scores)

An update to pg. 50 regarding children in poverty:

According to the Annie E Casey Foundation, Kids Count data center in 2014 43% of children were living in poverty in Orleans parish as compared to 28% for the state of Louisiana as a whole. Comparably, St. Tammany had a rate of 15% children in poverty and St. Charles 18%.

(<http://datacenter.kidscount.org/data/tables/1518-children-in-poverty?loc=20&loct=2#detailed/2/any/false/869,36,868,867,133/any/7803,3243> )

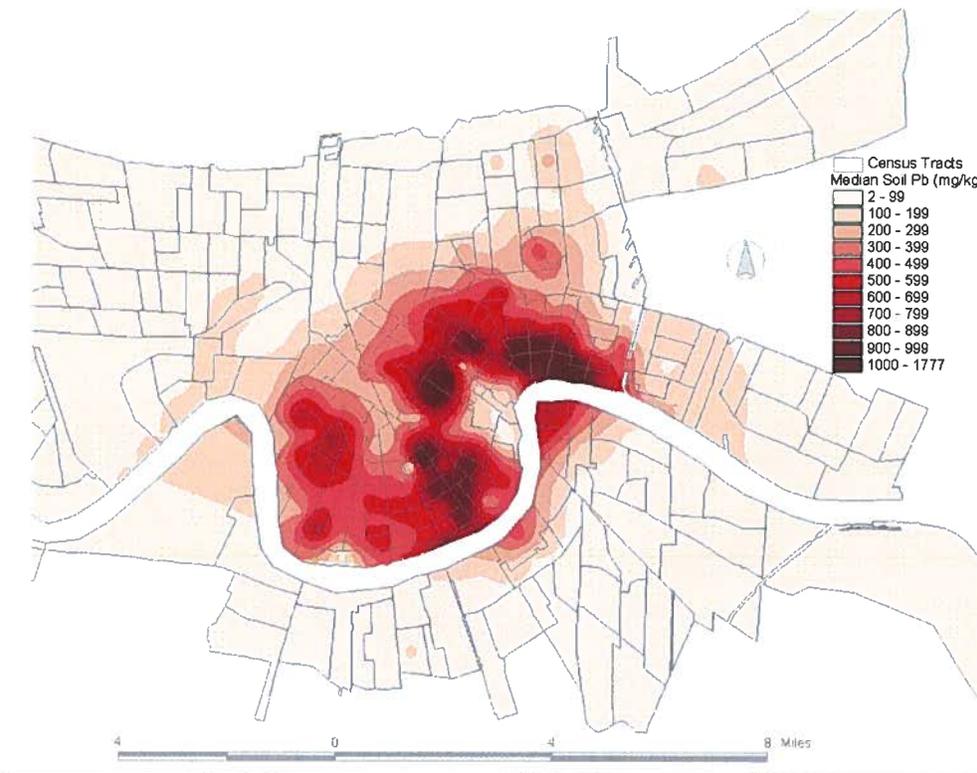
**Lead (pg. 62):**

The link provided links to a correspondence referring to the study. The actual study can be found here, Rabito, F.A., Iqbal, S., Perry, S., Arroyave, W. and Rice, J.A. (2012). Environmental Lead after Hurricane Katrina: Implications for Future Populations. *Environmental Health Perspectives*, 120, 180-184.

<http://ehp.niehs.nih.gov/1103774/>

An additional study from 2010 shows the specific concentrations of lead in soil overlaid with census tracts in New Orleans.

(Abel, M.T., Cobb, G.P., Presley, S. M., Ray, G.L., Rainwater, T. R., Austin, G. P., et al. (2010). Lead Distributions and risks in New Orleans following Hurricanes Katrina and Rita. *Environmental Toxicology and Chemistry*, 29 (7), 1429-1437. <http://onlinelibrary.wiley.com/doi/10.1002/etc.205/abstract> )



<http://www.sciencedirect.com/science/article/pii/S004896970700842X>

New guidelines from the Center for Disease Prevention and Control (CDC) recommended that children's blood lead levels be less than 5 µg/dL, down from 10µg/dL prior to 2012. According to the CDC's Childhood Lead Poisoning Data in 2014 11% of Orleans parish children tested had elevated blood lead levels of 5 µg/dL or more. <https://www.cdc.gov/nceh/lead/data/state/ladata.htm> Problems associated with lead poisoning and elevated blood lead levels range from drop in IQ, attention deficit, hearing loss, slowed growth, hyperactivity, and headaches to nervous system and brain damage, even death. Lead poisoning has also been found to negatively affect academic achievement and has been tied to behavioral disorders such as violent crime. As the map above shows and as study of pre-Katrina soil lead demonstrates the burden of lead contamination disproportionately has effected and continues to effect African Americans and low-income people.

(Campanella, R. and Mielke, H.W. (2008). Human geography of New Orleans' high-lead geochemical setting. *Environment Geochemical Health*, 30 (6), 531-540.

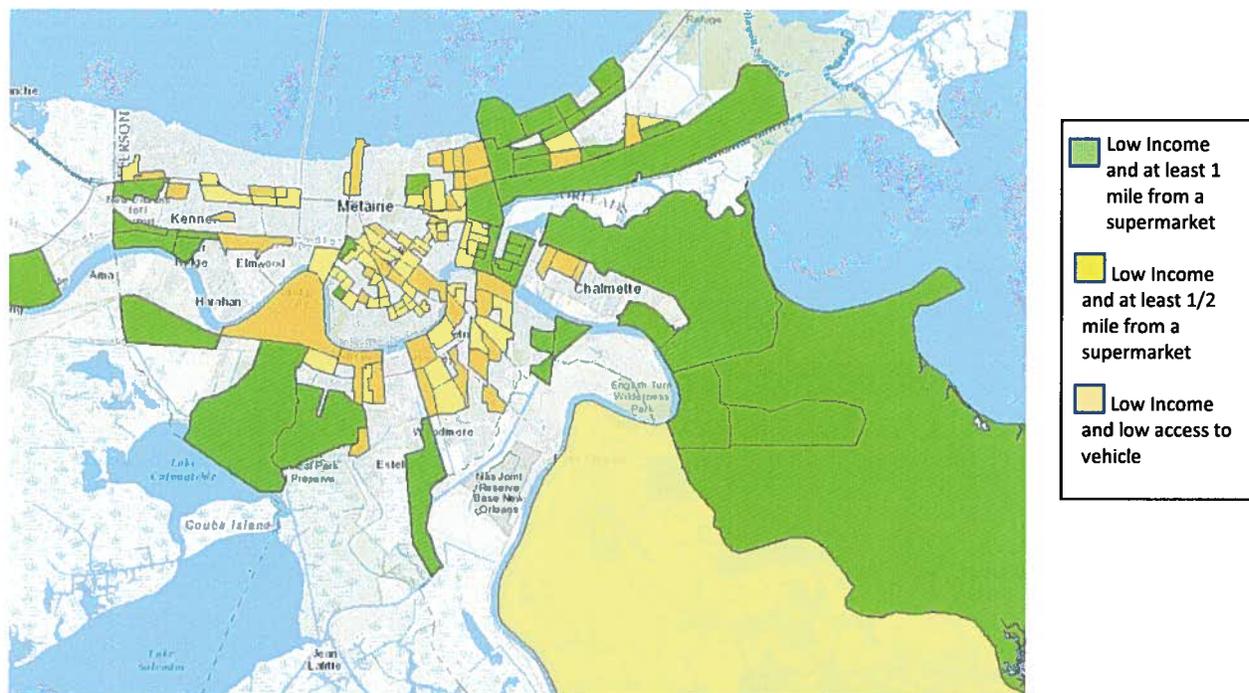
<http://www.ncbi.nlm.nih.gov/pubmed/18563588> )

#### **Food Access (pages 61-62):**

Food access or lack thereof should also be included when discussing 'patterns in disparities in access to opportunity'. In New Orleans, 23.7% of adults and 26% of children are food insecure and the city has just one supermarket for every 11,800 residents as compared to the national average of one per 8,600 residents. The USDA highlights neighborhoods with low income residents that are 1 mile or more from a supermarket in urban areas, what has commonly been referred to as a food desert. The map below highlights areas with poor food access for fresh fruits and vegetables and other staples that are usually purchased at supermarkets. Again, African American neighborhoods are more likely to experience a lack

of access to supermarkets. This was true prior to Hurricane Katrina, worsened in the four years after the storm and has since improved but is still not to pre-storm levels. (Rose, D., Bodor, J.N., Rice, J.C., Swalm, C.M. and Hutchinson, P.L. (2011). The Effects of Hurricane Katrina on Food Access Disparities in New Orleans. American Journal of Public Health, 101 (3), 482-484.

<http://ajph.aphapublications.org/doi/abs/10.2105/AJPH.2010.196659> )



<http://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>

**Affordable Housing Definition:**

Ensure that there is an agreed upon definition of affordable housing, like that outlined for Housing Nola’s Report using HUD’s definition of less than 30% of income going towards rental *and* utility payments for renters. For homeowners, 30% or less of income goes toward mortgage, utilities, property tax *and* insurance.

**Goal #1:**

Including a goal of expanding affordable housing in high opportunity areas is commendable. As part of the metrics to achieve this goal mandatory inclusionary zoning should be set at the highest possible threshold for affordable housing units in new developments and should target those units to the lowest income groups possible.

**Goal #10:**

Nearly one fifth of all renters in New Orleans are HCVP holders, that’s nearly 18,000 households encompassing over 19,000 children. As many of these goals are interrelated we would like to highlight the importance of Goal #6 as it relates to these program participants in particular. Small Area Fair Market Rents and other mobility strategies are necessary to ensure that voucher participants are able to afford to live in high opportunity neighborhoods and thus are less likely to have compounding negative health effects of toxins, stress, violence and poverty.

To: City of New Orleans Office of Community Development and Housing Authority of New Orleans

From: Greater New Orleans Fair Housing Action Center

Date: September 26, 2016

Re: Comment on the Draft 2016 Assessment of Fair Housing

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Please accept the following comments on behalf of the Greater New Orleans Fair Housing Action Center (GNOFHAC) on the Draft 2016 Assessment of Fair Housing (AFH).

GNOFHAC commends the City and HANO's commitment to providing the residents of New Orleans with a thorough and honest assessment of the fair housing challenges facing our city. The AFH process so far has been collaborative and self-reflective, allowing for critiques of past actions and new proposals for the future. The City and HANO have consistently demonstrated throughout the assessment process that they are committed to a living document that uplifts strategies to pursue more integrated communities. Some examples of strategies that have already been set in motion include:

- HANO's scattered site plan to rebuild deeply affordable housing in low-poverty neighborhoods like the Bywater and Uptown.
- HANO's new criminal background screening policy, which creates a fair process for current and prospective HANO tenants with criminal backgrounds.
- The City's commitment in *Housing for a Resilient New Orleans* and the Draft AFH to pass a mandatory inclusionary zoning ordinance and create affordable units in high-opportunity, market-rate developments.
- The City's commitment in a *Housing for a Resilient New Orleans* and the Draft AFH to pass a Healthy Homes ordinance to uphold basic health and safety standards for rental housing in the form of a rental registry.

The draft AFH also includes a number of other commitments that GNOFHAC strongly supports for future implementation, including:

- The City's commitment to aggressively conduct and support fair housing education and enforcement activities. GNOFHAC audits and complaints consistently show high rates of housing discrimination on the basis of race, disability, family status, and the presence of a criminal record. As an organization that serves the entire state, we welcome this commitment to expand the scope of reach to educate the public.
- The City's commitment to better coordinate affordable housing initiatives with public works, to ensure that investments in gentrifying neighborhoods are paired with affordability. Recent projects like the St. Roch Market and neutral ground are likely to attract more real estate interest and make it difficult for lower-income residents to stay in transitioning neighborhoods to

enjoy the improvements. We commend the City for its commitment to 1) better track its CDBG-funded public works projects; 2) revise its Place-Based investment strategy to take gentrifying areas into account; and 3) continue to use its NOFAs to target affordable housing into these areas.

The draft AFH is a strong document, and could be even further strengthened by the inclusion of the following significant fair housing challenges facing our city.

I. The first challenge is the segregation of participants in New Orleans' largest affordable housing program, HANO's Housing Choice Voucher Program (HCVP). The program currently serves nearly 18,000 families, or one-fifth of all renters in the City. One-quarter of all children in New Orleans also live in HCVP households. Given the share of residents served by this program, it would be impossible for the City to affirmatively further fair housing without addressing barriers to opportunity in the HCV program.

The draft AFH reports that the majority of HCVP families do not live in neighborhoods of extreme poverty denoted by Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). However, it should be noted that the R/ECAPs themselves are skewed in New Orleans because of a poverty rate that is nearly twice the national average. The overwhelming majority of voucher families (79%) live in areas with poverty rates that are even higher (illustrated by the accompanying map) than the citywide rate of 28%. Almost all of those areas are also heavily racially segregated. Voucher holders are disproportionately likely to live in neighborhoods with 10 or more shootings per year and in areas with worse birth outcomes. The Post-Katrina voucher program is now twice as large; its expansion coincided with the demolition of 5,000 public housing units and a shortage of market-rate rental units. As a result, voucher holder families are now more likely to be located in farther-flung neighborhoods with little access to public transit, jobs, or the kinds of opportunity that help families break the cycle of poverty. As an example, there are now more voucher families in New Orleans East than there were public housing units in the "Big Four" developments before the storm.

HANO clients echoed these concerns at multiple public comment sessions, including a training at the New Orleans East Library and at a Resident Advisory Board (RAB) meeting hosted by HANO. RAB representatives described voucher holders in New Orleans East who are cut off from transit, see children up at 5am to catch buses to higher-performing schools across the city, and broken support systems that make childcare and other daily activities incredibly difficult. One resident shared that she had hoped to use her voucher to return to an area close to the city center where she's from, but finds herself priced out and is now stuck in the Lower 9<sup>th</sup> Ward where she has little access to healthy food and is disconnected from family.

A full description of these impediments to opportunity in the HCVP are missing from a number of sections of the Draft AFH, including:

- Pg 33-34: The Additional Information sub-section asks for relevant information about segregation in the jurisdiction affecting groups with other protected characteristics and mobility options for protected class groups.
- Pg. 83: This section compares publicly supported housing programs' location in and out of Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs), but does not mention the 79% of HCVP households who live in racially segregated areas with poverty rates above the citywide rate of 28%.
- Pg. 92: The Contributing Factors of Publicly Supported Housing Location and Occupancy section does not explain how the decision to demolish 5,000 public housing units and double the size voucher program re-concentrated poverty in farther-flung neighborhoods with little access to opportunity.

In the face of this displacement and segregation, GNOFHAC would welcome a process with HUD, HANO, the City, and partner organizations to increase opportunity for HCVP families. Strategies that would achieve that goal include, but are not limited to:

- Implementation of Small Area Fair Market Rents (SAFMRs), which would set payment standards at the zip code rather than metro-wide level.
- A robust, pilot mobility counseling program that includes pre-move counseling, housing search assistance, orientations to new neighborhoods, and post-move support.
- A study of the merits of regional voucher administration.
- Landlord recruitment efforts in high-opportunity neighborhoods.

Unfortunately, HANO's recent changes to the draft AFH do not adequately address the problem. In the changes shared on September 28<sup>th</sup>, the study to improve HCVP mobility is unnecessarily tied to HUD's SAFMR rulemaking, although many of the strategies above don't require SAFMRs. The commitment to at least study a path to improvement was also captured by the citywide housing plan, HousingNOLA, which HANO also participated in. Delay of any study only prolongs the deep segregation that HCVP families face daily.

II. The second, and related challenge is to ensure that the HCVP provides a standardized and easy-to-navigate pathway for landlords who want to participate. As mentioned above, all successful HCVP mobility programs include a landlord recruitment component intended to attract new landlords in higher opportunity neighborhoods. However, public comments captured during the AFH process suggest that prospective HCVP landlords are both uninformed about the opportunities available and frustrated by the existing process. One commenter at the second public hearing asked whether it was even possible to join the program as a landlord. As an engaged neighborhood leader she was concerned that the perception among many landlords was that the program was closed. Another prospective HCVP landlord submitted lengthy comments detailing the multiple barriers to entering the program, including difficult to access information about

inspection standards and other processes; cumbersome and unnecessary paperwork; unclear payment standard information; and significant, months-long delays that ultimately forced the landlord out of the program. If HCVP households are going to be able to live in high opportunity residential neighborhoods that are often characterized by a housing mix more typical of New Orleans—in other words, single or double-family houses over large multi-family complexes—then the program must be feasible for small landlords that rely on timely rent payments and insignificant administrative burdens. GNOFHAC applauds HANO for its commitment to streamline the process and remove barriers to participation, but recommends more detailed proposals and metrics. GNOFHAC welcomes the opportunity to partner with HANO to:

- Create an informational welcome packet that is publicly available online and at HANO for prospective HCVP landlords. Any packet should include information about physical property requirements and an inspection list, required documentation and paperwork, timelines, rules, the benefits of being a HANO landlord, policies and expectations.
- Make individual rents more predictable, transparent, and able to be calculated accurately by prospective landlords.
- Provide oversight in the HCVP program for landlord case managers, ensuring that case management is service-oriented, transparent, and includes predictable timelines.
- Ensure that all forms, documents, and information are available online to the general public.
- Conduct inspections at landlord, rather than tenant, expression of interest. Landlords should not have to secure tenants before inspections are conducted.
- Ensure that the entire process from landlord expression of interest to lease-up takes no more than one month.
- Allow tenant references to be available to landlords in advance of voucher acceptance.
- Create processes for landlords and tenants to electronically sign documents.
- Ensure timely payment of deposits and first month's rent.

III. The third challenge is ensuring that HANO's Project-Based Voucher (PBV) clients also have access to opportunity. PBVs provide unique flexibility to site more deeply affordable units in higher-opportunity neighborhoods than Housing Choice Voucher Program ("Section 8") families can often access. According to the 2016 PHA plan, the majority of HANO's PBV units are currently cited in census tracts with poverty rates greater than 40%. Siting future units in areas with poverty rates below 20% will help to create the balance that HUD's Affirmatively Furthering Fair Housing guidance calls for. HANO clients will also benefit from access to lower-poverty neighborhoods with high-frequency transit stops, below-average gun violence rates, and better access to job centers.

We commend HANO for including the strategy of prioritizing future PBVs for high-opportunity neighborhoods, but the agency's recent changes to the AFH metrics will not achieve this goal. In previous drafts, the metric described success as 60% of new PBVs cited in areas with poverty rates below 20%. HANO changed that metric to instead call for a 3% decrease in the number of PBV units in R/ECAPs over the next five years. As mentioned above, this is a very low bar for success since non-R/ECAP areas are not necessarily low-poverty neighborhoods of opportunity. On the contrary, the vast majority of HCVP households who live in non-R/ECAP areas are living in places with poverty rates twice as high as the national average. Given HANO's plans to significantly expand its PBV inventory in the coming years, the agency should commit itself to locating the majority of those units in areas with poverty rates below the citywide rate of 28%.

IV. The fourth challenge is ensure that the City and HANO prioritize their housing resources in high-opportunity and gentrifying neighborhoods and prioritize non-housing investments in underserved areas. Nearly all of the AFH strategies are committed to addressing this challenge, for which all parties should be commended. However, one of the recent edits is inconsistent with this goal: inclusion of the rebuilding of public housing and scattered sites in R/ECAPs. Redevelopment plans at the Florida and Desire projects have long been underway. Still, the addition of deeply affordable units into highly segregated areas with extreme poverty should not be billed as advancing the affirmatively furthering fair housing rule. Doing so sets a dangerous precedent and GNOFHAC strongly recommends that these strategies be removed from the plan.

V. The fifth challenge is to address New Orleans' history of environmental racism. In the 1960s and 1970s, the City and HANO built the Gordon Plaza subdivision atop a former industrial landfill and sold its homes to the African American residents of the nearby Desire Project. Those homeowners and their children have been deeply engaged in this AFH process, telling heart-wrenching stories of chronic health issues, pre-mature death, and a self-reported 93% cancer rate among residents. The remaining 54 homeowners are stuck in their toxic neighborhood without the resources to relocate. GNOFHAC echoes their call for the City and HANO to assist these homeowners in relocating to a safe neighborhood, free of toxic contamination.

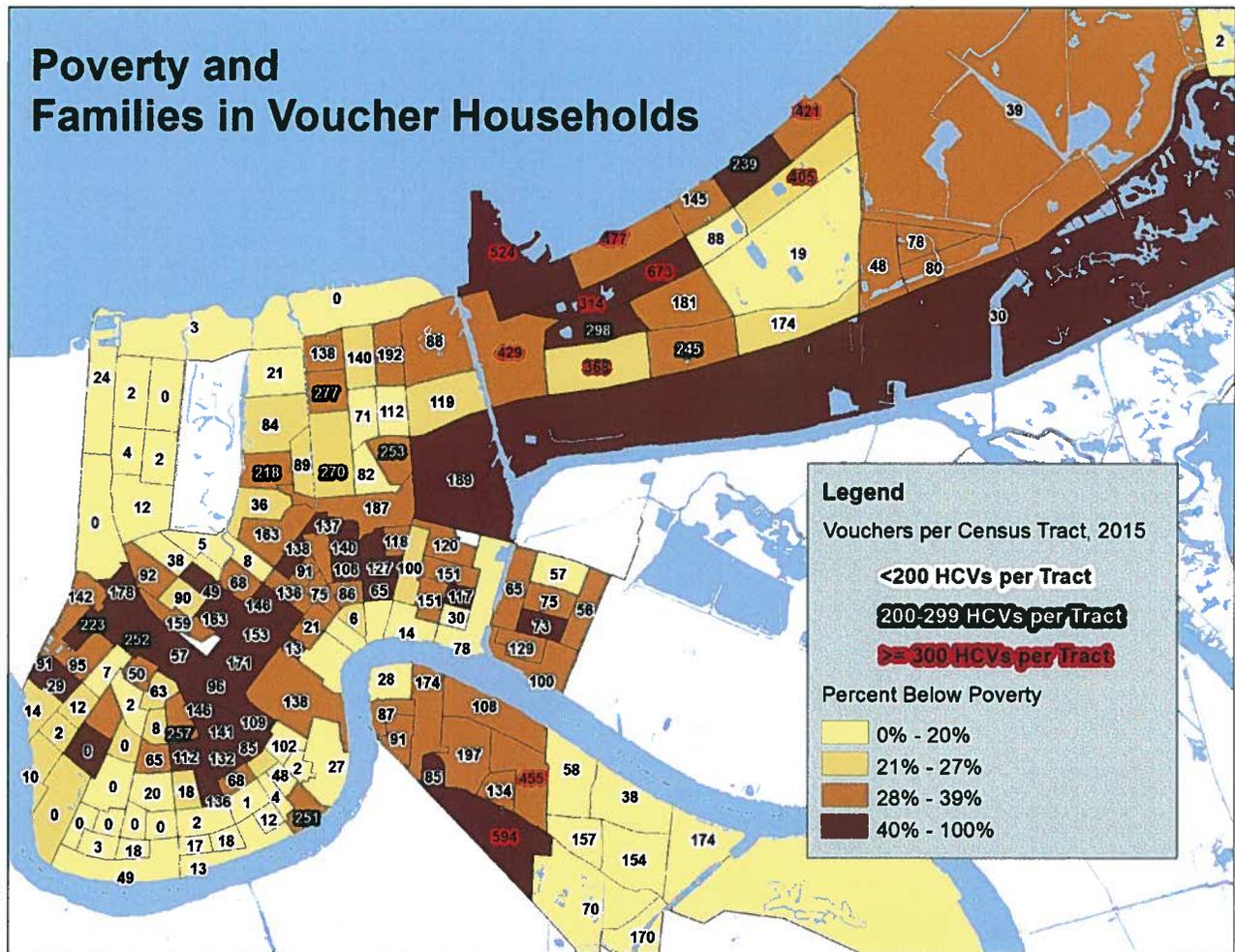
VI. The sixth challenge is the failure of national lenders to maintain their real estate owned (REO) properties in neighborhoods of color. Promoting the sale of bank-owned REOs to owner-occupants over investors may offset the neglect of these properties, which depresses property values, increases health risks, and escalates code enforcement costs. Further, GNOFHAC embraces the City's longstanding commitment to target blight reduction, infrastructure, and amenities into underserved neighborhoods where REOs are most prevalent.

VII. Finally, the last challenge to be mentioned here is the displacement of long-time homeowners from quickly gentrifying neighborhoods. Home values in certain parts of the city have increased by as much as 250% since Hurricane Katrina. In

combination with rising flood insurance rates and water bills, higher property taxes may push long-time homeowners out of these neighborhoods. A finely tuned property tax relief policy would help curb displacement and preserve existing affordability at little cost to the city. We ask the City to follow the lead of Chicago, Philadelphia, Boston, and Washington D.C. to study and pursue additional property tax relief for low-income homeowners facing displacement in gentrifying neighborhoods. Further, the City should engage in a public education campaign to let homeowners know about existing exemptions for which they might qualify.

Again, GNOFHAC is grateful for the leadership of the City and HANO during this assessment of fair housing. Through a robust process, we have together been able to articulate some of the steepest challenges, as well as the most promising opportunities. GNOFHAC offers itself as a continued collaborator and resource. We look forward to continue our work together to implement these goals and strategies and ensure we are building a New Orleans that provides opportunities and access for all.

# Poverty and Families in Voucher Households



Kayemba Mvula  
9/26/2016

Comments on the Draft New Orleans Assessment of Fair Housing  
Vera Institute of Justice

According to GNOFAC's Locked Out report, there are clear racial disparities in arrest and jail rates for African Americans which lead to increased discrimination in access to housing. Their analysis indicates that African Americans with criminal backgrounds experience differential treatment in half of their inquiries for rental housing. Additionally, 42 percent of housing providers were found to discriminate on the basis of race in the way that they explain or apply their criminal background screening policies.

Our own analysis at the Vera Institute indicates that there are approximately 1600 people in Orleans Parish Prison, the local jail, at any one time. Black men are 50 percent more likely to be arrested than white men and black women are 55 percent more likely than their white counterparts to be arrested. They also tend to have longer jail stays which often leads to greater disruption of their lives which could possibly lead to loss of employment and, consequently, housing. Overrepresentation of black New Orleanians in the local jail, as discussed above, can eventually lead to discrimination in employment and housing markets compounding the cost of incarceration.

Past convictions are certainly not the only driver to inequality in access to housing in the city of New Orleans, but they certainly play a significant role. Housing is an important first step, for re-entry, for those recently released from a jail or prison facility. Access to housing, for individuals with criminal records, may be limited, through a number of means, including lack of access to employment, which may be the result of discrimination on the part of a prospective employer, but also through discrimination from landlords or property owners.

The analysis in the Assessment of Fair Housing does touch explicitly on issues related to criminal records, but also by proxy, by looking at racial disparities, as people of color are more likely to have criminal convictions. But lack of access to housing and other amenities for people of color is more pronounced for those with criminal convictions, than those who do not have them. For example, while more job opportunities may be available in Jefferson Parish than in Orleans Parish, and people of color, due to lack of access to transportation, may be less capable to access those jobs; people of color with convictions may not be able to access either.

The Housing Authority of New Orleans (HANO) is in the process of implementing an important new policy, which will allow renters with past-convictions to gain access to public housing pending review. But that same access may not be afforded to individuals with criminal records in privately owned buildings. The Assessment of Fair Housing does touch on issues related to past convictions, but an expanded and more specific analysis of its contribution to lack of access to housing in New Orleans may be beneficial.

Due to the limitations in access to housing discussed above, the City of New Orleans and HANO should work to lower barriers to expanded affordable housing as outlined in Goal # 1 in the draft report. They should also work to expand access to housing for individuals with past convictions as outlined in the new HANO policy and as discussed in Goal #8. Outlining the need for these policy changes will require more focus on in the report's analysis. Taking these steps would significantly decrease housing

Kayemba Mvula  
9/26/2016

discrimination and help stabilize the lives of the formerly incarcerated who have already served their time.



## ADVOCACY CENTER

SERVING PEOPLE WITH DISABILITIES AND SENIOR CITIZENS

### **AFH COMMENT**

The Advocacy Center of Louisiana is the P & A agency that protects, empowers, and advocates for the human and legal rights of people with disabilities and seniors living in Louisiana. The substantial challenges in finding find affordable, accessible housing for our target populations can be complex and multi-faceted, so we are very grateful to the City of New Orleans and HANO for their efforts to collect input from housing organizations and stakeholders to apply towards the AFH Plan.

The Advocacy Center administers the City of New Orleans' Home Modification Program, which provides mobility and accessibility related home modifications to seniors and people with long-term, permanent, physical & mobility related disabilities. While the program effectively serves low-income homeowners in Orleans Parish, currently there is no equivalent program for renters. Providing or referring equivalent home modification services for renters and supporting the creation of more accessible units would greatly help fill such a demand.

One of the biggest obstacles towards finding affordable, accessible housing is the lack of clear information about what's available at any given time, including detailed information about accessible features that may or may not be included in each unit. While some search engines do provide options based on these features, it is apparent from the limited number of results returned from each category that in addition to the lack of accessible units available throughout the city, the information given to the search engines by landlords on accessibility features is incomplete.

The lack of access to basic services in more remote areas of the city is felt more greatly among seniors and people with disabilities than other populations, due to issues with fixed incomes and lack of mobility. Incentives for developers to set aside 10% of new units for Permanent Supportive Housing programs are a necessary component to addressing this problem. Expansion and continued enforcement of this program is key to making sure there is an ample supply of affordable, accessible units for our target population.

We are encouraged by the City's support for fair housing organizations' outreach, education, and enforcement programs. A continued outreach effort to educate renters as to the available tools and information needed to search for affordable, accessible units, as well as landlords as to how to indicate & provide accessible features for renters is vital to an effective system for ensuring that tenants' basic housing needs are met.



JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

September 26<sup>th</sup>, 2016

Office of Community Development  
1340 Poydras Street, Suite #1000  
New Orleans, LA 70112

Re: Comments on the Proposed Draft Assessment of Fair Housing

To Whom it May Concern,

JPNSI is a housing and development organization committed to creating sustainable, democratic, and economically just neighborhoods and communities. JPNSI works to transform unjust housing policies and practices through strategies that support permanent affordable housing, equity building for residents, security of tenure, and community controlled development. JPNSI develops permanently affordable housing using the community land trust (CLT) model, promoting community development without displacement. As a CLT, JPNSI purchases and holds land in perpetuity, and leases or sells homes on the land to residents at an affordable rate. CLT housing is permanently affordable, thereby protecting the public investment and recycling the subsidy for generations of residents and families.

Jane Place Neighborhood Sustainability Initiative (JPNSI) is grateful for the time and effort the City and HANO have dedicated to this fair housing process and hopeful for the results it has the potential to deliver. In general, we are supportive of the 10 goals and their respective metrics put forth in the draft AFH, however we request the inclusion of more detailed metrics and milestones. Hard target numbers would be particularly useful with regard to the goals for the development of affordable housing via programs like inclusionary zoning, the breakdown of affordable rentals vs. homeownership units to be produced, and to what extent public land will be utilized to support affordable housing. Similarly, including a timeline as to when goals will be achieved would be helpful in determining how on-track the city is over the next few years as it works towards these goals.

JPNSI submits the following detailed comments on each of the 10 goals outlined in the Assessment of Fair Housing Tool draft:

**Goal #1:** The City and HANO will work to lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies including mandatory inclusionary zoning.



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

Fair Housing Issue: The overwhelming majority of all subsidized housing units are located in high-poverty, majority African American areas of the city with little access to job centers, transit, and other amenities.

### Contributing Factors:

- NIMBYism
- Zoning limits on multi-family housing
- LITHC QAP requirement for local approval

### Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

o Use City funds for homeowner and renter rehabilitation for creating neighborhood stability across the City, with priority in high opportunity neighborhoods.

Responsible Program Participant: OCD

### JPNSI Comment:

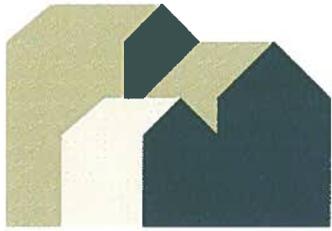
- **JPNSI supports rehabilitation funds for both homeowner and rental units, however, without any additional targets this goal could be fulfilled by a program that overwhelmingly supports homeowners and does little to fund rental rehabilitation. The metric should additionally note that these units are affordable, rather than market-rate.**
- **With regard to rental units, JPNSI encourages OCD to specify the number of affordable rentals that will be rehabilitated. Once rehabbed, units should be targeted at individuals making less than 30%, 50%, and 80% AMI, as there is a huge unmet need for affordable rentals serving residents at these income levels.**

o The City, NORA and HANO will direct more public land toward affordable residential development with a priority for development in high opportunity neighborhoods and on parcels within a quarter-mile of any high frequency transit stop (30 minute headway or less). Responsible Program Participant: OCD, HANO, NORA

### JPNSI Comment:

- **JPNSI strongly supports the dedication of public land to affordable housing development. We recommend the City, NORA, and HANO also prioritize land distribution to mission-driven affordable housing developers who can ensure long-term affordability. The largest housing need facing the city right now is affordable rentals, and this goal should reflect a proportionate commitment to rental housing.**

o Expand affordability periods beyond minimum requirements on developments receiving public financing from the City, NORA, and HANO.



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

Responsible Program Participant: OCD, HANO, NORA

### **JPNSI Comment:**

- **Long-term affordability is incredibly important to JPNSI and we agree that baseline requirements of 10 years for HOME program funds is far too short and prevents the city from efficiently using its affordable housing dollars and meeting our affordable housing needs. This AFH should set a specific target for what the baseline affordability period should be, such as 50 years, as it is in the density bonus language in the Comprehensive Zoning Ordinance.**

o Prioritize affordable housing infill development and new large mixed income multifamily rental developments in high opportunity neighborhoods.

Responsible Program Participant: OCD, HANO, NORA, CPC

o Implement mandatory inclusionary zoning that prioritizes affordable housing development in high opportunity neighborhoods.

Responsible Program Participant: OCD, CPC

### **JPNSI Comment:**

- **Mandatory inclusionary zoning is an important policy change needed to increase affordability in New Orleans. JPNSI encourages the city to make a strong commitment and require 25% of units in new developments to be affordable in order to address the wide gap between low availability of affordable rental housing and high demands for affordable rentals.**

o Promote reforms to current zoning regulations that prohibit the production of affordable housing in high opportunity neighborhoods.

Responsible Program Participant: OCD, CPC

### **JPNSI Comment:**

**JPNSI supports such reforms and is particularly concerned about the HU-RD2 zoning district, which restricts affordability in high opportunity neighborhoods by not allowing denser multi-family structures. We are also alarmed by the lack of commentary in this report regarding short-term rentals (STRs). This goal in particular illuminates the need to discuss how STRs are impacting housing availability in our city, especially within high opportunity neighborhoods. For the past year, the city has discussed how to legalize and regulate STRs. The City Planning Commission staff recommendations included several options for the legalization of STRs that explicitly work against the above goal: 1) they allow for up to four entire homes per block to be rented out year-round as STRs; 2) they allow for**



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

an unlimited number of STRs to operate within condominium developments within mixed-use zoning areas; and 3) they allow for an unlimited number of owner-occupied doubles to operate an entire unit of their double as a year-round STR.

The majority of short-term rental listings in New Orleans are for entire homes or apartments, and they are primarily clustered within neighborhoods that are considered high opportunity. Of the 4,316 Airbnb listings currently available, 72% are listed as “entire home/apartment.” This means 3,119 homes are no longer available for long-term residents of our city. Neighborhoods that were once affordable working-class communities are experiencing steep increases in housing cost and availability alongside increases in STRs. This includes JPNSI’s service area of Mid-City, which has seen an increase from 73 to 276 STRs over the past year—an increase of 278% (178 of the listings are for entire homes).

The city has made a commitment to develop or preserve affordable housing in “high opportunity” neighborhoods like Mid-City--neighborhoods with high quality public schools, access to transportation, healthcare options, and amenities like grocery stores. Changing the zoning code to allow for thousands of homes to be removed from the housing market and directed towards commercial housing for tourists undermines that commitment and this goal.

- Dedicate a fixed percentage of general revenue derived from developer and permitting fees, blight code violations, and other local revenue streams to affordable housing initiatives.

Responsible Program Participant: OCD

### JPNSI Comment:

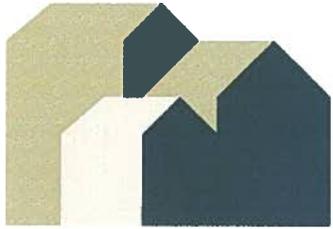
- The real estate market is booming in New Orleans and harnessing that growth to fund affordable development is an excellent goal. JPNSI simply requests a more detailed target for the percentage of revenue dedicated to affordable housing in order to better understand what success will look like.

- Prioritize City development incentives to support affordable housing investments in high opportunity neighborhoods and infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.

Responsible Program Participant: OCD, Industrial Development Board, CPC

### JPNSI Comment:

- The City should be clear that there is a significant difference between underserved neighborhoods and historically underserved neighborhoods where housing costs are now rising. In these gentrifying areas, ensuring that access to affordable housing is



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

**firmly in place before spurring development is critical. Without that first step the City will repeat the pattern of “improving” a neighborhood only to see it become unaffordable to the residents most in need of increased services. Please include language around how to address the timing of improvements in order to ensure residents most in need will not be displaced.**

- **Additionally, JPNSI respectfully asks for more information on specific development incentives available to the city and how they will be promoted in such a way as to combat NIMBYism in high opportunity neighborhoods.**

o Advance equitable transit-oriented development for underserved populations.  
Responsible Program Participant: OCD, HANO, NORA, CPC

### **JPNSI Comment:**

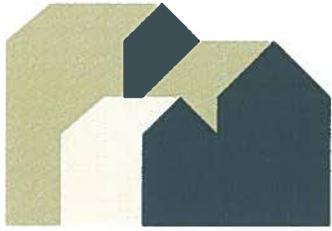
- **Transit-oriented development (TOD) is listed here as a goal and in the document, yet it is not defined. Many studies have shown TOD to increase housing costs and displace residents where transit hubs exists. Given this background, JPNSI requests that the City include its understanding of TOD policies, how they will ensure equitable results, and how this approach will address transit projects—like streetcars—that spur gentrification in certain neighborhoods.**

**JPNSI also recommends the City work with the RTA to consider the implementation of bus rapid transit (BRT) to address the transit needs of underserved populations. BRT is less invasive, less expensive, and is less likely to lead to residential *and* social land use displacement.\***

**\* By social land use displacement, JPNSI refers to the upgrading and/or new uses of business, sites, or gathering spaces designed to meet the needs of or attract new residents while marginalizing the needs of existing residents.**

**Goal #2:** The City will prioritize public investments in transit, quality schools, healthy foods, parks, and other amenities in underserved communities.

Fair Housing Issue: Segregated and low-income neighborhoods in New Orleans tend to have a disproportionate share of hazards and fewer amenities. Areas with high gun violence rates, toxic dumps and no high-performing schools or fresh food retailers have seen decades of disinvestment and require public support to ensure residents have access to opportunity. The City has made significant strides in addressing this goal since Hurricane Katrina, but must also be careful to monitor historically segregated areas that are now seeing more market activity and changing demographics so that they can combine any infrastructure investments with affordable housing.



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

### Contributing Factors:

- Transit investments prioritized for streetcar lines in higher-income and whiter communities.
- Toxic dumps and other environmental hazards are disproportionately represented in neighborhoods of color.

### Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

- Reduce blight and vacancy by promoting alternate land use by creating new neighborhood amenities such as community gardens, playgrounds, and pocket parks.

Responsible Program Participant: OCD, HANO, NORA, CPC

### JPNSI Comment:

- **This is a worthy goal, however, it's unclear if this is specific to publicly owned land.**

- Direct CDBG funding not designated for housing programs to underserved areas with little housing market activity.

Responsible Program Participant: OCD, Public Works, Capital Projects

- Prioritize City development incentives to support affordable housing investments in high opportunity neighborhoods and infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.

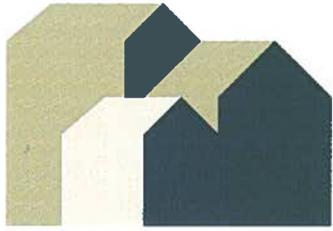
Responsible Program Participant: OCD, NORA, Economic Development, Industrial Development Board, CPC

### JPNSI Comment:

- **Again, it is important to consider the timing of investments, and to ensure that affordable housing is developed or protected prior to supporting other development initiatives in underserved communities vulnerable to discrimination, residential and social land use displacement, and gentrification.**

**Goal #3:** The City will work to reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities by supporting fair housing organizations.

Fair Housing Issue: Recent investigations by the local fair housing center show discrimination against prospective African American renters half the time in high opportunity neighborhoods. A similar report showed housing providers using criminal background checks as a tool of



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

discrimination 50% of the time. The non-profit organizations that currently conduct education and enforcement activities do not have the resources to meet the need in New Orleans.

### Contributing Factors:

- New Orleans has persistently high segregation scores on the dissimilarity index. Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

o Provide monetary or other support for local fair housing groups' education and enforcement programs. Responsible Program Participant: OCD

o Provide letters of support for local fair housing groups' grant applications. Responsible Program Participant: OCD, HANO

o Facilitate collaboration with NORD-C on GNOFHAC Fair Housing Five workshops with youth. Responsible Program Participant: OCD, NORD-C

o Publicize local fair housing groups' trainings and outreach materials through the Office of Neighborhood Engagement's email list and other relevant lists.

Responsible Program Participant: OCD, Neighborhood Engagement

o Issue a Fair Housing Month (April) press release from the Mayor's office highlighting fair housing resources.

Responsible Program Participant: OCD

o Implement transparent tracking and reporting of complaints to the Human Relations Commission.

Responsible Program Participant: OCD, Human Relations Commission o Display local fair housing groups' resources at the One Stop Shop.

Responsible Program Participant: OCD, CPC

o Schedule training for 311 operators on fair housing issues and resources.

Responsible Program Participant: OCD

**Goal #4:** The City will devote substantial funds towards housing preservation to address deficits in code enforcement and weather related challenges in maintaining housing stock.

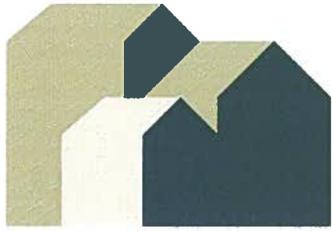
### JPNSI Comment:

- **JPNSI requests information on how the City will accomplish this and metrics information for meeting this goal.**

**Goal #5:** Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and rental affordable housing, and permanently dedicating land to affordability.

### JPNSI Comment:

- **JPNSI strongly encourages the explicit inclusion of community land trusts as a proven tool for successfully creating permanently affordable homeownership and**



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

**rental housing. CLTs are committed to permanent affordability in regards to both rental housing and homeownership, and are an effective way to recycle limited public subsidies to ensure that affordability is maintained for generations of residents.**

Fair Housing Issue: The City of New Orleans' Place-Based Strategy, is designed to make investment in areas that are in need of public subsidy to reach full potential. However, in some cases, rebuilding efforts have targeted public subsidy in historically African American, high-ground neighborhoods poised to gentrify. Without a complimentary investment in affordable housing, some of these neighborhoods have already shifted to majority white and previous long-time residents are not present to enjoy the new amenities.

### Contributing Factors:

- Place-Based infrastructure improvements.
- Aggressive code enforcement leaving some lower-income homeowners struggling to maintain and keep their homes.
- Increase in short-term rentals in gentrifying neighborhoods.

### JPNSI Comment:

- **Lack of renter's rights leaving residents vulnerable to large increases in rental prices and extremely fast eviction proceedings**

Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

- o Pursue additional property tax relief for low-income homeowners.

Responsible Program Participant: OCD

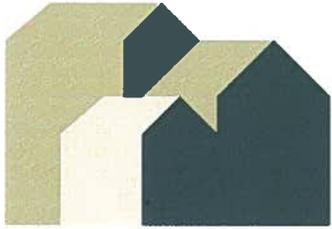
### JPNS Comment :

- **JPNSI strongly supports this goal and is deeply concerned about long-term, lower-income homeowners in our service area being priced out of their homes because of rising property taxes and other non-mortgage costs. In Mid-City many of these homeowners are African American and their loss would hasten the trend of residential and social land use displacement and segregation.**

- o Investigate other measures to preserve affordable rental units in gentrifying and high opportunity neighborhoods.

Responsible Program Participant: OCD

### JPNSI Comment:



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

- **Please list what other measures are being investigated. JPNSI strongly encourages the development of and support of community land trusts as a powerful tool to protect permanently affordable housing in gentrifying neighborhoods.**

- Implement a 2% transaction fee on short-term rental listing sites and dedicate the revenue to the NHIF for investment in preserving affordability in gentrifying neighborhoods.

Responsible Program Participant: OCD

### **JPNSI Comment:**

- **JPNSI strongly supports this transaction fee. STRs are contributing to the affordability crisis and the City should ensure that STR hosts are also paying into the NHIF to offset that effect. We also recommend that whole home rentals should be banned, and that commercial STRs and owner-occupied doubles should be allowed as a conditional use only and limited in number. When implemented, this will deliver thousands of units in high opportunity neighborhoods back to the rental market.**

**Goal #6:** City agencies will adopt an equitable healthy housing approach that recognizes the direct connections between housing and public health to address environmental hazards and toxins, chronic stress, violence, and other conditions that diminish quality of life.

Fair Housing Issue: According to the 2011 American Housing Survey, New Orleans has a particularly high rate of rental housing with environmental hazards. As much as 78% of the private rental housing stock needed major repairs in the past 12 months. Hazards in the home include mold (1,700 units), fire hazards (5,000+ units), and rodent and insect infestations (7,000+). Insect infestations have taken on a new level of concern as the Zika virus threatens the Gulf Coast and female-headed households with children are overrepresented in the rental market. African Americans are also overrepresented in the rental market, and even more so in areas with little market activity where conditions are likely to be worse.

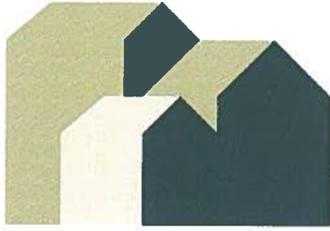
### **Contributing Factors:**

- The City currently does not accept code enforcement complaints about nor inspect the interior of homes.

### **Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant**

- Adopt Health and Safety Standards for occupied rental housing in the form of a Rental Registry

Responsible Program Participant: CAO, Code Enforcement



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

**Goal #7:** Transit-dependent populations will have reliable, frequent, and affordable access to multimodal transportation options.

Fair Housing Issue: RIDE data shows many farther-flung, segregated areas of the city have little access to jobs in the region by way of public transit. Neighborhoods of color have also disproportionately seen a decline in RTA service since Hurricane Katrina.

Contributing Factors:

- RTA past preference for investments in streetcars over expanded bus service.
- Need for a transit master plan and multi-modal transit hub in the CBD.

Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

- Advance equitable transit-oriented development for underserved populations.

Responsible Program Participant: OCD, RTA, CPC

**JPNSI Comment:**

- See comments above under Goal #1.

- Prioritize City development incentives to support affordable housing investments in high opportunity neighborhoods and infrastructure and transit upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.

Responsible Program Participant: OCD, RTA, CPC

**Goal #8:** The City and HANO will ensure that its internal policies and practices will advance access for groups with significant challenges in accessing safe and affordable housing, including people with criminal records and people with disabilities.

Fair Housing Issue:

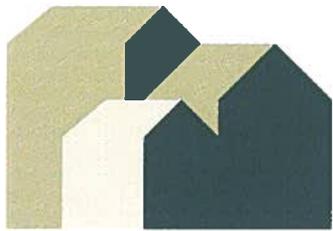
Contributing Factors: Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant

- The City and State should prioritize and target limited funding for high risk special needs populations in all programs.

Responsible Program Participant: OCD, RTA, CPC

- Implement the 2016 HANO criminal background check policy.

Responsible Program Participant: HANO



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

- New Orleans City Council should draft and pass an ordinance that requires transparency and accuracy in background checks used to secure public and private rental housing.  
Responsible Program Participant: City Council

### **JPNSI Comment:**

- **The City, HANO, and other agencies should ensure that all public-facing materials, websites, and documents related to housing are available in Spanish, Vietnamese, and Arabic and widely circulated.**

**Goal #9:** The City will launch a public awareness campaign designed to create broad-based support for fair housing efforts throughout the NOLA metropolitan region based on a shared understanding of housing equity as the cornerstone of broad-based economic prosperity.

**Goal #10:** HANO will aggressively work to increase the share of its HCVP and Project-based voucher clients who live in high-opportunity neighborhoods.

**Fair Housing Issue:** 79% of HCVP households and Project-Based Voucher (PBV) residents live in high-poverty census tracts with rates above the citywide poverty rate of 28%. Only 11% of households live in census tracts with poverty rates below 20%.

### **Contributing Factors:**

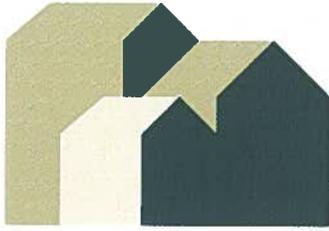
- Few mobility policies in the HCVP
- Lack of awareness by small landlords to enter the HCVP program
- Use of metro-wide Fair Market Rents to set payment standards
- Racial bias among landlords unwilling to accept vouchers.
- Placement of past PBV buildings in high-poverty neighborhoods.

**Metrics, Milestones, Timeframe for Achievement, and Responsible Program Participant -** Encourage the participation of landlords in the HCV program by streamlining processes and removing barriers to participation.

**Responsible Program Participant:** HANO 120 - HANO will determine feasibility for mobility strategies that do not reduce the number of families currently served under the Housing Choice Voucher (HCV) Program, including implementing Small Area Fair Market Rents (SAFMRs)

- Encourage the participation of landlords in the HCV program by streamlining processes and removing barriers to participation. Responsible Program Participant: HANO

### **JPNSI Comment:**



## JANE PLACE NEIGHBORHOOD SUSTAINABILITY INITIATIVE

- **JPNSI strongly supports this goal and requests more specific details on how the process will be streamlined and which barriers will be removed. JPNSI board members have tried unsuccessfully to navigate the process of becoming an HCVP landlord and the organization hopes at some point in the future to accept HCVs.**

- HANO will determine feasibility for mobility strategies that do not reduce the number of families currently served under the Housing Choice Voucher (HCV) Program, including implementing Small Area Fair Market Rents (SAFMRs).

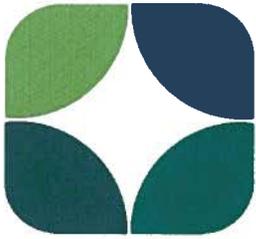
### **JPNSI Comment:**

- **The HCV Program is the single largest affordable housing program in the City, and its participants deserve the opportunity to live throughout our city. JPNSI strongly supports HANO implementing SAFMRs, housing mobility counseling, and more landlord recruitment programs.**

- HANO will prioritize future PBV units in census tracts with poverty rates of 20% or less.

### **JPNSI Comment:**

- **The majority of HANO PBV units are now in areas of extreme poverty. JPNSI strongly supports the placement of future PBV units in high opportunity neighborhoods to ensure residents have the best outcomes.**



Orleans Parish

# Equity in All Places

Where People, Place, and Power matter

September 26, 2016

Thank you for this opportunity to provide feedback on the draft Assessment of Fair Housing. Our organization, Equity in All Places, uses the Social Determinants of Health framework to advocate for place-based policies that create equitable, safe, and healthy communities.

In 2014 we conducted a study that showed that despite education reforms, there is still a clear and strong link between high-risk neighborhoods and lack of education opportunities. We recognize that the fair housing plan is a chance to address these disparities. We can apply an intersectional approach to address education issues by addressing neighborhood housing patterns.

Furthermore, we value addressing the root causes of inequity. We want to acknowledge the importance of having discourse about the role that racism has historically played and a commitment of relying on racial equity as a fundamental and guiding principle in this process. We appreciate the city's efforts to have dialogue on these difficult topics.

We hope that you find the following feedback helpful as you continue in this process.

Given the community feedback that was collected on school busing issues, we would like to see this feedback substantiated with the data from our organization's 2014 Report. We would like to see the following information added in Section iii.

#### Disparities in Access to Opportunity

##### 1. Analysis

##### a. Educational Opportunities (either in section i or wherever appropriate)

In 2014, Equity in All Places published a Community Health and Education Report on Education Policies (CHER-EP) of 2014 focused on eight high-risk neighborhoods, where the population was predominately Black and poor. The report concluded that the majority of children living in the high-risk neighborhoods are attending low performing schools. 50% of New Orleans students who are living in high-risk neighborhoods attend low performing schools in their neighborhood or an adjacent neighborhood. Another 33% are traveling from their own neighborhood that has low-performing schools to attend low-performing schools in other neighborhoods. This finding has been further substantiated recently by the Education Research Alliance's

(ERA) report on student mobility in a post-Katrina landscape. The ERA study concluded, “lower-performing students are more likely to move to schools with performance similar to the ones they left.”<sup>i</sup>

<http://www.equityinallplaces.org/wp-content/uploads/2014/11/OPM-Community-Health-Equity-Report-on-Educational-Policies-2014.pdf>

In section i, we would like to see the data on suspension rates paint a clearer picture of the disproportionalities occurring in Louisiana. To do so, the following information could be included:

In Louisiana, African-American students are suspended and expelled at disproportionately high rates. While Black students make up 44 percent of the public student population, they received 67 percent of out-of-school suspensions.<sup>ii</sup> A study by the University of Pennsylvania demonstrated that’s schools in 13 Southern states were responsible for more than half of all suspensions of Black students nationwide, and Louisiana was one of them.<sup>iii</sup>

We also believe it is important to note, in section iii, that the mass firing of teachers also led to a significant shift in the demographic makeup of the teachers:

Following the mass firing, the number of Black educators has fallen from 71 to 49 percent in the last decade. As one news article noted, “white people founded a disproportionate number of the charter schools and, perhaps predictably, hired from within their own often predominantly white networks.”<sup>iv</sup>

Furthermore, we hope to see the following recommendations on education policy, as they relate to housing, incorporated into the city’s plans.

1. **Increase investment in schools in our most vulnerable neighborhoods.** Equity requires that we lift up neighborhoods that are struggling. Through increased investment in schools in high-risk neighborhoods, we ensure parents and students better choices, access, and opportunities.
2. **Continue to study the impact of education reform on high-risk neighborhoods.** The purpose of school choice is to increase opportunities for students, especially those who are economically disadvantaged and come from high-risk neighborhoods. However, school choice might actually increase risks for students by creating further instability in their already high-risk neighborhoods.
3. **Reform school discipline laws and policies.** Schools with high suspension rates are creating an increased risk of students dropping out of school and ending up in the criminal justice system. Laws and policies should hold schools accountable for lowering their suspension rates and adopting discipline alternatives, such as PBIS and restorative approaches.
4. **Explore programming that strengthens connections between communities and schools.** In the current educational landscape, there is

little to no connection between a neighborhood and its schools. Thus, it is critical to explore alternative ways to create connections for the benefit of our children and communities, preserve culture, and cultivate a sense of self-determination.

5. **Develop community engagement plans.** Meaningful community engagement requires a cultural shift in the way policymaking happens, a commitment to power sharing and inclusion, and a genuine integration of community members (especially those who represent marginalized populations) into the policymaking process. Policymakers should develop a community engagement plan created in collaboration with the community, and which is shared with the public. They should declare and uphold a clear commitment to outreach, making their plans accessible to the public. They should be held accountable to having significant community engagement as part of their policymaking process.
6. **Conduct dialogues and trainings on issues of race and equity.** Every educational institution and policymaking body should declare and uphold a commitment to understanding how implicit bias and discrimination operates on institutional, structural, and interpersonal levels. They should create a plan with action steps to reduce and erase implicit bias and its ill effects upon students and that includes implicit bias trainings and race dialogues.
7. **Establish equity advisory councils.** Every educational institution and policymaking body should have an advisory entity which focuses on addressing equity issues and outreach to marginalized populations.

Thank you again for the opportunity to provide commentary.

Sincerely,  
Florentina Staigers  
Policy Analyst

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<sup>i</sup> <http://educationresearchalliancenola.org/news/student-mobility-report-released-what-happened-to-student-mobility-after-the-new-orleans-market-based-school-reforms>

<sup>ii</sup> [http://www.nola.com/education/index.ssf/2015/01/black\\_students\\_are\\_disciplin ed.html](http://www.nola.com/education/index.ssf/2015/01/black_students_are_disciplin ed.html)

<sup>iii</sup> <http://www.npr.org/sections/ed/2015/08/25/434650842/study-tracks-vast-racial-gap-in-school-discipline-in-13-southern-states>

<sup>iv</sup> [http://www.slate.com/articles/life/tomorrows\\_test/2016/06/new\\_orleans\\_needs\\_more\\_black\\_teachers\\_and\\_knows\\_it\\_why\\_is\\_progress\\_so\\_slow.html](http://www.slate.com/articles/life/tomorrows_test/2016/06/new_orleans_needs_more_black_teachers_and_knows_it_why_is_progress_so_slow.html)



September 26, 2016

Thank you for inviting us to comment on the HANO's and the City's Assessment of Fair Housing Tool. We applaud the City and HANO's collaborative approach with advocates to creating this document.

While we support the substance of the analysis, there are a few areas that we would recommend further development and inclusion of language. Specifically, the specific challenges and barriers facing People Living With HIV and those with disabilities. These individuals face additional discrimination and barriers in accessing housing.

Here are our specific recommendations:

**Environmentally Healthy Neighborhood Opportunities (Page 61)**

**Under Access to Healthcare (Page 64)** add the following:

The state of Louisiana authorized the expansion of Medicaid to 138% of the federal poverty level for adults effective July 1, 2016. As of September 2016, the state reports that over 305,000 of the 375,000 individuals have been enrolled into Medicaid. This expansion will have a positive impact on reducing the access of healthcare to low income individuals, many of whom are African American.

According to the Louisiana Department of Health and Hospitals there are an estimated 7,897 people living with HIV/AIDS in the New Orleans MSA as of June 2015 and 440 persons who were newly diagnosed with HIV in the New Orleans MSA in 2014. The New Orleans MSA ranked 3rd among large MSAs in the nation for estimated HIV case rates (36.90 per 100,000). African Americans (AA) in Louisiana are experiencing a severe health disparity in regards to HIV and other sexually transmitted diseases. In 2015, 71% of newly diagnosed HIV cases were African American, compared to 21% Caucasian. African American patients tend to be disproportionately impacted by factors such as low income, low educational levels, substance abuse issues, homelessness, and other social challenges.

Recent HIV/AIDS housing research has found positive relationships between stable housing and health-related outcomes. Along with this research, the recent development of the HIV Care Continuum model provides additional evidence on structural supports needed throughout the sequential stages of HIV medical care in order to achieve viral suppression. The provision of stable housing is identified in this model as an intervention that greatly impacts PLWHA's ability to be diagnosed, be linked and remain in care and to achieve viral suppression. Since housing is so critical to successfully managing HIV, it is important to assess the housing challenges clients face and carefully consider the most effective housing and service strategies to

address those needs. To that end, the CHANGE Coalition, and Collaborative Solutions Inc., began conducting housing focused analyses in 2008, utilizing data from the Louisiana Persons Living With HIV/AIDS Statewide Needs Assessment (SNA) made available through the State Office of Public Health, STD/HIV Program. As additional SNA's were completed, in 2011 and 2013, further analyses were conducted to provide both current and longitudinal information. Supplementary information used for this report came from a series of consumer focus groups conducted in 2012 and from the annual HOPWA CAPER reports for the City of New Orleans.

### *Summary Findings*

Based on the overall survey results, the following describes the evolving issues faced by low-income persons living with HIV/AIDS in the New Orleans area.

<b>INCOME:</b>	Very low income, with a mean income of less than \$1000/month across all 3 years  2013 mean income = \$908.76
<b>INCOME SOURCES:</b>	Income from wages reduced from 24% to 19% between 2008 and 2013 Major sources in 2013 were SSI/SSDI (60%). Increased from 49.8% in 2008. More than 40% receive Food Stamps (44% in 2013)
<b>GENDER:</b>	Female – 38% in 2013. Increased from 32% in 2008. Male – 58% in 2013. Decreased from 63% in 2008. Transgender – 4% in 2013. Increased from 1.2% in 2008.
<b>RACE/ETHNICITY:</b>	Black – 67% in 2013 White – 24% in 2013. Increased from 20% in 2008. Other – 7% in 2013. Hispanic – 7% in 2013. Decreased from 9.4% in 2008.
<b>EMPLOYMENT:</b>	Employed – 26% employed in 2013. Decreased from 33% in 2008. Unemployed – 73% unemployed in 2013. Increased from 62% in 2008.
<b>EDUCATION:</b>	High school/GED – 24% in 2013. Decreased from 33% in 2008. Beyond High school/GED – 72% in 2013. Increased from 65% in 2008.
<b>LIVING SITUATION: (CURRENT)</b>	Permanent housing – 88% in 2013. Increased from 63% in 2008. Temporary housing – 5% in 2013. Decreased from 9% in 2008. Homeless – 4% in 2013. No change from 2008.
<b>BARRIERS TO CARE:</b>	Highest-rated issues that posed a barrier to HIV care – Money to pay for rent Lack of resources Fear of disclosure
<b>HOUSING STABILITY RISK FACTORS:</b>	

<b>HOMELESSNESS:</b>	4% reported “current” homeless in all three years. 11% homeless at least 1 night in 2013. Decreased from 29% in 2008. At-risk numbers likely much higher
<b>AFFORDABILITY:</b>	The vast majority – 60% in 2013 – pay more than 30% of income for rent/utilities. 35% had an extreme housing burden – paying more than 50% of income for rent Affordable rent for most PLWHA is \$272/month. FMR for a 1-BR was \$755/month. The affordability gap is high, as is the rent burden for most PLWHA.
<b>RENT INCREASE IMPACT:</b>	Nearly one quarter of PLWHA feel they would have to move if rent increased by just \$50. As many as 46% would have to move if the rent increased by \$100.
<b>HOUSING TENURE:</b>	PLWHA have shown increased tenure in housing since 2008. 37% had lived in their unit for less than 6 months in 2008; only 18% in 2013.
<b>SUBSTANCE ABUSE/ MENTAL HEALTH:</b>	7-10% of respondents reported receiving substance abuse treatment in the past 6 months. 28-31% reported recent mental health treatment, in the past 6 months. 3-6% reported both.
<b>STABILITY:</b>	Across all 3 survey years, nearly 70% of respondents have one or more risk factors. Even among “permanently housed”, 57% - 70% had one or more housing risk factor. In 2013, nearly 1/3 of respondents had 2 or more housing stability risk factors. Very low income households + high housing costs and high cost burden = high need for subsidized housing

In a recent analysis of the health outcomes of individuals living with HIV/AIDS on the tenant based rental assistance program, there was a statistically significant decrease in viral load for individuals who had been stably housed versus a control group that was not provided ongoing rental assistance.

**Goal #5 (page 116)**

- Add in a commitment to preserve ADA accessible units.

**Change Goal #8 to read (page 118)**

The City and HANO will ensure that its internal polices, practices **and funding priorities** will advance access for groups with significant challenges in accessing safe and affordable housing, including people with criminal records, people with disabilities, **homeless** and **people living with HIV/AIDS**.

- Add HANO as a Responsible Program Participant

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**NEW ORLEANS WORKERS' CENTER FOR RACIAL JUSTICE**  
217 N. Prieur Street New Orleans, LA 70112

September 27, 2016

Mitchell J. Landrieu,  
Mayor  
City of New Orleans  
Mayor@NOLA.gov

Ellen M. Lee,  
Director  
Office of Community Development  
AFFH@NOLA.gov

Greg Fortner,  
Executive Director  
Housing Authority of New Orleans  
info@HANO.org

*VIA E-MAIL*

RE: Stand with Dignity Comments on the 2016 Assessment of Fair Housing Plan

Dear Mayor Landrieu, Ms. Lee, and Mr. Fortner,

We write to you today to express deep appreciation for the work that you have undertaken to build the 2016 Assessment of Fair Housing Plan. This is an important opportunity for New Orleans to begin the process of ensuring a city that welcomes all of its native residents to stay, live and thrive in our city.

Stand with Dignity (Stand) is a grassroots membership organization of structurally unemployed and underemployed Black workers dedicated to building career ladders for workers who have been locked out of work in the redevelopment of New Orleans and fighting for first class citizenship across New Orleans. As such we are deeply concerned about the availability of housing for long term low income New Orleans residents, particularly Black residents of New Orleans.

Since Katrina we have increasingly seen the rents in New Orleans skyrocketing in the city center and pushing out those very workers who were once able to walk to work

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or take a short bus ride to work in the tourist economy of New Orleans. The lack of opportunities for affordable housing has pushed people further and further out from the city center.

The policies of both HANO and the City of New Orleans have exacerbated that exclusion from the center of New Orleans outward. Policies that have invested in major infrastructure projects in neighborhoods that have traditionally been affordable without addressing future housing affordability in those neighborhoods and have kept Housing Choice Vouchers (HCVP) at one level across the city so that HCVP residents do not have an opportunity to live in neighborhoods that are convenient to fresh food, transportation, jobs and recreation are examples of how both agencies have contributed to the current housing crisis in New Orleans.

The Plan as written, if implemented well could begin to address some of the disparities in city planning and investment in affordable housing. The purpose of the AFFH Rule is to ensure meaningful action is taken to combat discrimination, overcome patterns of segregation, and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

We have prepared critical changes to be made which can address the increases in segregation in New Orleans, and further advance the stated goals of this process. We hope you will take each of these proposed changes under careful consideration as we continue to work towards building a New Orleans that works for all of its citizens, particularly those who have been most impacted by exclusionary policies and practices after Katrina who are the membership of Stand with Dignity.

1. **DEEPLY AFFORDABLE HOUSING:** HousingNOLA's plan makes it clear that the greatest demand for affordable rentals is for people at 30% AMI and below (pg 31). We believe that the following should be added or kept in the Plan.
  - a. The city's mandatory inclusionary zoning ordinance should specify priorities setting aside affordable units for lower affordability levels like 30% AMI and below Goal #1, Metric #5 (pg 114).
  - b. HANO should focus on developing its scatter sites in low-poverty neighborhoods and set a standard that 50% of all scatter sites should be in low-poverty neighborhoods by 2018.
  - c. The City should dedicate a portion of general fund revenue to deeply affordable housing in Goal #1, Metric #7 (pg 114)
  - d. HANO should grant its new Project-Based Voucher units to developers in low-poverty neighborhoods, Goal #10, Metric #3 (pg 120)
  
2. **PERMANENT AFFORDABILITY:** Goal #1, Metric #3 (pg 113). The City of New Orleans should work to do more with their affordable housing dollars- and any tax breaks given to housing developers.

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- a. The current reality is that we have been short sighted in housing affordability- much investment post Katrina is currently rolling off because of extremely short affordability periods. We need to create more permanent affordability in New Orleans- expand the affordability periods to 99 years or longer.
  - b. We would also like to see home ownership subsidies dedicated to community land trusts or other permanently affordable home ownership models.
3. **GENTRIFICATION: Goal #5 Page 116** As property values increase, so do property taxes and this is creating a crisis for New Orleans where many low income homeowners can no longer afford to live here.
  - a. We applaud efforts to reduce the tax burden that many long time low income home owners are facing and hope that the city will act swiftly to implement this as many other cities are doing. We as a city have faced massive gentrification and need to ensure that low income homeowners are not taxed out of their homes.
  - b. Additionally, whenever the City invests in infrastructure improvements or other amenities (fresh food access, parks, drainage, transit, etc.) in gentrifying neighborhoods, it should make complimentary investments in affordable housing to ensure long-time residents are not displaced. Think about OC Haley- the street is quickly transforming but the surrounding community is getting harder for long term residents to afford.
4. **SHORT TERM RENTALS: Goal #5, Metric #3 (pg 117)** If we as a city are going to legalize short term rentals we want to make sure that the plan includes a plan to subsidize affordable housing with those short term rentals.
  - a. The landlords who are pushing to legalize their illegal short term rentals now are publicly stating that they are subsidizing regular rental housing through short term rentals. We have an opportunity to expand affordable housing with large landlords who are using short term rentals- lets require they do it- 75% permanently affordable housing and 25% Short term rentals. We can therefore create more affordable housing in New Orleans.
  - b. An alternative option is the one listed in the proposal to add a transaction fee to contribute to affordable housing- however it should be significantly higher- we would propose 8%.
  - c. Ultimately we hope that any regulation of Short term rentals— especially regulations that allow whole-home rentals—will include measures to expand affordable housing in New Orleans.
5. **RENTAL REGISTRY: Goal #6 (pg 117-118)** Stand members have suffered great challenges with slumlords in New Orleans. We have members who are

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constantly under attack by rodents and pests because of poorly constructed homes with numerous cracks and crevices to enter, faulty plumbing and wiring and little to no action when they complain to landlords about it. We deserve dignified housing and want to see a robust plan to set standards for rental housing in New Orleans with enforcement.

- a. This goal does not propose a timeframe, milestones or metrics- it merely states that there should be a new rental registry and that the CAO and Code Enforcement would be responsible. Without a fuller plan it is hard to evaluate what the city actually plans to do with this and on what timeline you can be held accountable for the passage and implementation.
  - b. Additionally- and this is critical- this plan must include critical protections against retaliation for tenants who speak up and try to defend their rights. Currently if a landlord wants to evict a tenant, even if it is in retaliation for complaints there are no protections for that tenant- for this program to be successful, tenants need more protections from retaliation.
  - c. We hope that landlords will be responsible for paying for this rental registry and that there will be measures in place to ensure that an increase in the quality of housing will not result in an exclusion from housing both through retaliation by landlords and through pricing out of the market for low income renters.
  - d. Additionally, tenants often do not receive their deposit back in part because there is little consequence for landlords who do not return their deposits- the City should work to increase these consequences in court and set a new standard for landlords who do not want to return security deposits. Alternatively, the city could create a simplified process that does not involve filing in small claims court but still pressures Landlords to return security deposits.
6. **CRIMINAL BACKGROUND POLICIES: Goal #8, Metric #1+2 (Pg 118-119) Stand with Dignity, along with partners including VOTE fought for 4 years to win a groundbreaking criminal background policy at HANO.**
- a. Given the City's priority to reduce incarceration and recidivism we believe that not only should the goals include implementation of that policy but also a focus on compliance for third party property managers. These managers use public money and should work for the public good.
  - b. HANO should require its third party property managers to report on criminal background denials, hearings, appeals, etc. in order to be publicly accountable for the implementation in all of these sites.
  - c. Metric #2, We agree that the city should implement a new law and regulation to ensure the accuracy and transparency of criminal histories—we would like to see a more robust timeline and plan.

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- d. Given the discriminatory impact of the use of criminal histories as highlighted in GNOFHAC's report "Locked Out: Criminal Background Checks as a Tool for Discrimination", the city must go further to expand access to housing for people with criminal histories. The city should commit funding for fair housing education and enforcement, particularly on criminal background exclusionary practices that have disproportionate impact.
7. HOUSING CHOICE VOUCHERS: Goal 10, Metric #1 (pg 119-120) HANO should ensure that Section 8 voucher holders can truly choose what neighborhood they want to live in- right now 79% of Section 8 residents live in areas with higher poverty rates than the city-wide poverty rate of 28%. Section 8 voucher holders need the option to live in high opportunity neighborhoods so they can access better jobs, better schools, and live in a lower poverty area if they choose.
    - a. One of the best ways to improve this is using Small Area Fair Market Rents (SAFMRs). That means HANO would set rents based on zip code level averages rather than metro wide averages so that a voucher would pay more in the Lower Garden District and less in New Orleans East. The data on how that has saved other housing authorities money and helped families move to lower-poverty neighborhoods is here (pg 5). This system would maintain true choice, allowing people to stay in any neighborhood of their choosing.
    - b. Additionally, HCVP participants have a challenge moving from one house to the other because of deposit requirements- often HCVP participants choose lower rent apartments because that is the security deposit that they are able to pay. HANO should implement a plan to assist with security deposits by paying based on income.
  8. CENTRALIZED RENTAL SEARCH AND ENFORCEMENT SITE: The city is proposing major shifts in housing policy in this Plan. We believe that enforcement of policy is the key to success and propose that the city and HANO implement a centralized rental search and enforcement website.
    - a. Require all landlords to list rental properties creating a centralized database that is updated by landlords. This could make it easier for people to find rental homes both on Section 8 and in the broader rental market.
    - b. Use the site as a way to ensure enforcement of the rental registry, affordability information, and other new policies and priorities highlighted in this plan and in our comments.
    - c. This centralized rental search and enforcement site could also act as a Tenant/Landlord rights and responsibilities portal for frequent questions especially on new laws and regulations to educate the public with a listing for further resources if either has questions or concerns

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on their rights and responsibilities and how to enforce them. We would be open to being listed as one of those resources.

- d. As the city is considering this website/app development we ask that you consider a rating system for landlords so that tenants can be forewarned about slumlords who do not live up to their responsibility.

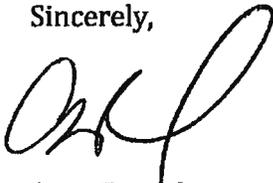
9. METRICS, MILESTONES, AND TIMEFRAME: The Fair Housing Goals and Priorities as laid out in this document do not set Metrics, Milestones, or timeframe for any of the goals laid out. We are deeply concerned that without these questions answered on each of the goals there will not be urgency in accomplishing them. We hope that each of the goals will lay out realistic metrics, milestones and timeframe before they are submitted to HUD.

We understand that this is the most comprehensive assessment to date and appreciate that the timeline was very short to complete it. Your community engagement was swift and intentional, but did not allow enough time to accomplish a broader engagement. We hope that in the future there will be more opportunity for advanced planning as the speed needed to complete this process made it somewhat difficult to engage a broader audience of New Orleanians.

We look forward to major shifts in housing policy here in New Orleans that can help to make New Orleans a place that communities of all income levels and racial backgrounds can thrive. Stand with Dignity has seen the impact of a rapidly gentrifying city and the time is now to take action- before we lose the very heart of what makes New Orleans, New Orleans- our culture, our history, and our people.

Thank you once again for moving this important process in New Orleans. Please let us know if we can be of further assistance or if you need clarification on any of our crucial points in these comments through email at [stand@nowcrj.org](mailto:stand@nowcrj.org).

Sincerely,



Anza Bechel  
Lead Organizer



Alfred Marshall  
Organizer



Latoya Lewis  
Organizer

On behalf of the members of Stand with Dignity

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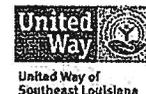
Tuesday, September 27, 2016

To: City of New Orleans  
Office of Community Development  
& Housing Authority of New Orleans

**RE: COMMENTS TO DRAFT 2016 ASSESSMENT OF FAIR HOUSING**

On behalf of Southeast Louisiana Legal Services, the largest nonprofit civil legal aid law firm in Louisiana providing free civil aid to low-income people in twenty-two parishes, we submit the following comments on the draft Assessment of Fair Housing proposed by the City and the Housing Authority of New Orleans (HANO). Based on our daily interactions with subsidized tenants and the agency, we have targeted only our top recommendations. We look forward to continued cooperation with fair housing stakeholders as we seek to serve our mutual clients.

1. **People living with disabilities and/or the elderly make up a majority of total participants in HANO programs. According to HUD's Resident Characteristics Report through 8/31/2016, 59% of HANO public housing households are people living with disabilities and/or the elderly. In the tenant and project-based HANO voucher programs, people living with disabilities and/or elderly are 47% and 62% respectively of all HANO program participants. HANO has an obligation to take meaningful action to ensure program participants living with a disability have equal access to fair housing.**
  - a. Little to no housing search assistance or mobility counseling is currently provided to HANO voucher holders living with disabilities. HANO previously had several staff devoted to accommodating the needs of disabled voucher holders. SLLS is unaware of this service being provided in a meaningful, affirmative manner to the thousands of voucher holders who struggle to find housing that meets their needs.
  - b. To meet its obligations, HANO should provide housing search assistance to help people living with disabilities in finding suitable homes. SLLS recommends that HANO convene a working group to develop resources and affirmative strategies to meet the varied needs of disabled and/or elderly voucher holders.
  - c. SLLS encourages HANO to utilize and fully inform disabled voucher participants about their right to an exception payment standard as a reasonable accommodation. Federal regulations governing the voucher program at 24 CFR 982.503 (b)(iii) state "The PHA may establish an exception payment standard of not more than 120 percent of the published FMR if required as a reasonable accommodation in



accordance with 24 CFR part 8 for a family that includes a person with a disability.” Upon information and belief, less than 1 % of all HANO voucher participants utilize an exception payment standard. This is despite the fact that almost 50% of all assisted households have at least one family member with a disabling condition. In our experience, voucher holders are not informed of this right that currently exists under the law.

- d. Households with a family member living with a disability should also be made aware of their potential eligibility for an increased utility allowance. HUD regulations provide that a disabled voucher household may qualify for a higher allowance if they have extra utility costs related to the disability such as higher electricity costs for someone uses certain medical equipment. The law provides that “On request from a family that includes a person with disabilities, the PHA **must** approve a utility allowance which is higher than the applicable amount on the utility allowance schedule if a higher utility allowance is needed as a **reasonable accommodation** in accordance with 24 CFR part 8 to make the program accessible to and usable by the family member with a disability.” (emphasis added) 24 CFR 982.517 (e). Yet families are generally not informed of this right or provided information about how to make such a request. SLLS is glad to assist HANO in developing a request packet for disabled voucher holders seeking either a higher utility allowance or an exception payment standard.

**2. Through the use of turnover vouchers, HANO should reinstitute admissions preferences for families that include persons with disabilities.**

- a. In the past, HANO utilized special admissions preferences for persons with disabilities. Due to full voucher utilization, the authority has not had the resources to set aside the same level of preference vouchers as in the past. Commendably, HANO’s 2016 draft Annual Plan still references the reinstatement of those preferences. The Annual Plan also states that it expects a 10% turnover rate for its housing vouchers. With the agency administration of 17,740 vouchers, this means approximately 1,740 should be available for use on an annual basis to meet community needs.
- b. We strongly recommend that HANO renew actual allocation of vouchers for these preferences through the use of turnover vouchers. For instance, HANO could provide vouchers to people with disabilities or other special populations such as the homeless through providing every 1 in 3 to special populations. HANO should review its use of Mainstream Vouchers allocated years ago for people with disabilities. The agency is required to use such vouchers as they are turned over to new households composed of a person with a disability.

3. **HANO should take substantial steps to publicize the applicability of its new criminal background policy to currently assisted households who may want to reunite with a family member with a record. HANO should update related materials provided to both public housing and voucher assisted tenants. HANO's policy changes have significant potential to impact the 20,000 families it assists who already live in assisted housing—not just applicants on waiting lists.**
- a. SLLS fully supports HANO's reform of its criminal background policy after years of previous blanket denials. While the change in policy has received media attention, HANO has not taken sufficient steps to ensure that program participants are aware of the change in policy and its ramifications for their households. Most currently assisted families are unaware of how the new policy may allow them to reunite with a family member with a criminal record. There are no signs in HANO's waiting rooms or offices advising people that they can make a request to add someone to their assisted household. Nor to SLLS' knowledge have any letters or notices been mailed to the almost 20,000 currently assisted families. HANO should publish the new policy on its website and social media platforms, as well as produce fliers and advertisements to update residents on the change in policy.
  - b. Current application forms should be updated to incorporate the new policy and disclaim the fact that the existence of a criminal record except in the two mandatory reasons for denial, cannot be an automatic bar to voucher participation or public housing occupancy. An internet search of housing applications for HANO programs found an application for public housing that asks whether any member of the applicant's household has engaged in criminal activity within the last 7 years. [http://ghrhc.org/links/Guste I Guste III Rental Application 0614.pdf](http://ghrhc.org/links/Guste%20I%20Guste%20III%20Rental%20Application%200614.pdf). Such a question has a chilling effect on applicants and is inconsistent with HANO's new policies.
  - c. Without sufficient publication of the change in policy, HANO's duty to affirmatively further fair housing will not be met. The policy affects all 20,000 currently assisted households as well as the thousands more on waiting lists. Further, this practice policy disproportionately affects black families as one in seven black men in New Orleans are in prison, on parole, or on probation. [http://www.nola.com/politics/index.ssf/2016/06/ban the box louisiana 1.html](http://www.nola.com/politics/index.ssf/2016/06/ban_the_box_louisiana_1.html)
  - d. Lastly, irrespective of whether a family member has a criminal record or not, SLLS clients report having difficulty adding adults to their households. The practice of denying requests to add adult family members to assisted households runs contrary to the goals of building strong family support networks and fostering reunification. Research on criminal reentry shows that during an individual's first month following release, the risk of homelessness or return to criminal activity is high. The need for stable housing is imperative. [https://csgjusticecenter.org/wp-content/uploads/2012/12/Reentry\\_Housing\\_Options-1.pdf](https://csgjusticecenter.org/wp-content/uploads/2012/12/Reentry_Housing_Options-1.pdf)

4. **HANO should implement a reasonable accommodations policy that allows persons with disabilities access to accommodations ensuring equal access to housing. HANO should make its policy available to the public. The policy should include a streamlined application process for reasonable accommodations requests. Under the policy, HANO staff should respond to requests in a timely fashion and notify applicants of the appeals process for denied requests.**

The federal Fair Housing Act protects families who have at least one member who is a person living with a disability. This coverage also extends to families who are merely associated with a person with a disability. As noted above, HANO's Public Housing and Housing Choice Voucher programs have a staggering statistic of over 50% of all households reporting income from disability and/or Social Security. With over 50% of all HANO assisted households likely covered by the fair housing protections for disabled people, there is a dire and pressing need for HANO to focus additional attention on ensuring that its programs comply with the law, particularly in the area of reasonable accommodations. The growing population of clients with special needs poses a significant challenge requiring creativity, flexibility, and focused effort.

- a. HANO should implement a reasonable accommodation policy that connects families with accommodations in an efficient manner. Such a policy must not only achieve a reasonable result, it must also be reasonable itself. It must not create unnecessary hurdles for applicants to jump through. Though HANO's current reasonable accommodations policy allows people to make requests, in practice, persons living with disabilities face enormous and unnecessary burdens. Even when represented by counsel, these individuals wait weeks for any response at all from HANO—even an acknowledgment of receipt. For a final decision, some clients wait years.
- b. Second, HANO, in consultation with organizations such as SLLS, should develop materials and trainings to ensure tenants are aware of their rights and the reasonable accommodations process. This includes developing brochures and applications in accessible formats, holding "know your rights" trainings for new voucher holders, and holding periodic public meetings on reasonable accommodations. Trainings should also be provided to HANO voucher landlords as they seem to be unaware of their responsibilities in this area. Though some efforts have been made in this area, more needs to be done.
- c. Third, the process should be clear, easy to navigate, and free of unnecessary procedural requirements. HANO staff routinely require persons with disabilities to provide verification of their medical conditions and need for requested accommodations through "knowledgeable professionals"—generally physicians. HANO staff require this verification even if the disability is obvious. They require it even if the need for the accommodation is equally obvious. Worse, HANO staff require that previously granted accommodations be requested again at each annual recertification, at which time the verification paperwork begins all over again. Many physicians charge their patients fees to submit the paperwork that HANO requires. For some persons whose disabilities pose particular challenges, the burden of rearticulating the need for an accommodation, year after year, to a staff person who might have no familiarity with that person's file, is all but impossible.
- d. Fourth, the policy should be publicly available, in multiple formats that are kept reasonably updated as the policy is revised. At a minimum, the policy should be

posted on HANO's website, available in printed form in offices, and available in other formats upon request.

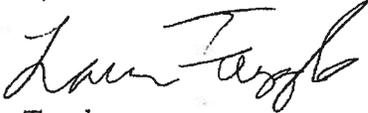
- e. Fifth, all applicants should receive date-stamped receipts of their request and/or supporting documentation. Staff should inform applicants on how to track their request.
  - f. Finally, HANO must make timely determinations and notify denied applicants of the appeals process verbally and in writing. **Several SLLS clients have experienced delays of months and in some cases over a year with no written response from HANO.**
5. **HANO should incorporate meaningful mobility counseling for HCVP residents to move to areas of greater opportunity through a Small Area Fair Market Rate (FMR) plan. While a move to a Small Area FMR plan creates opportunities for or families to move to neighborhoods of higher opportunity, absent meaningful counseling and assistance, voucher holders will still face barriers in finding housing in new neighborhoods.**
- a. As of 2010, HUD data shows that voucher use is highly concentrated in high-poverty areas that are racially segregated having less than 25% white residents. Approximately 25% of all vouchers were used in only 5% of the census tracts, resulting in a high concentration of voucher holders living in neighborhoods of low socioeconomic opportunity.  
<https://s3.amazonaws.com/gnocdc/reports/The+Data+Center-Expanding+Housing+Choice+in+New+Orleans.pdf> at page 3.
  - b. SLLS commends HANO's consideration of Small Area FMRs in the Assessment of Fair Housing to allow fair market rents to be set by zip codes rather than metropolitan-wide. Small Area FMRs could help encourage mobility among assisted families to higher opportunity areas with greater access to good schools, jobs, hospitals, and transportation among other considerations.
  - c. Though Small FMRs are a promising tool to promote mobility, absent additional resources spent on resident counseling and education, Small Area FMRs will alone be insufficient to affirmatively encourage mobility. Assisted families must overcome racism and stigma. Families will need mobility counseling to help them seek and obtain housing. HANO will need to invest in affirmative marketing strategies to get landlords in high opportunity areas to consider renting to tenants with vouchers. Since state, local, or federal law do not include having a voucher as a protected form of housing discrimination, additional incentives may be needed for landlords. These obstacles, in addition to unfamiliarity with areas of higher opportunity, could prevent the meaningful mobility contemplated by HUD.
  - d. SLLS requests that HANO and housing advocates such as GNOFHAC and SLLS, work together to collect and publish information on moving to higher opportunity neighborhoods in New Orleans. A task force should be assembled to assist HANO in an improved mobility counseling program. HANO should also dedicate additional resources and personnel with the sole responsibility to act as counselors that assist in moving households to neighborhoods of greater opportunity.

6. **HANO has a legal duty to ensure that the Resident Advisory Board (RAB) has a “reasonable representation” of families receiving tenant-based assistance and should take affirmative steps to ensure that Housing Choice Voucher program participants have adequate representation on the existing RAB.**
  - a. Current membership of the Resident Advisory Board is made up by a majority of public housing residents rather than voucher holders. Given that there are less than 2,000 occupied units of public housing and almost 18,000 voucher holders, there is a mismatch in representation. It is critical that voucher holders be given a stronger voice on the Resident Advisory Board. Needs for voucher holders often differ significantly from public housing residents as they face greater challenges finding suitable housing in the New Orleans rental market and have a greater need for mobility counseling.
  - b. The duty to have reasonable representation is explicit in HUD regulations. The regulations state, “Where the PHA has a tenant-based assistance program of significant size (where tenant-based assistance is 20% or more of assisted households), the PHA shall assure that the Resident Advisory Board (or Boards) has reasonable representation of families receiving tenant-based assistance and that a reasonable process is undertaken to choose this representation.” 24 CFR 903.13 (b)(3). In New Orleans, voucher participants comprise 90% of all assisted units. Yet the RAB does not have an adequate number of voucher holders on this body.
  
7. **HANO should have tenant resources available online and in a form accessible by smartphone to ensure broader and convenient access to supportive resources.**
  - a. HANO has a duty to publish this information online to promote equal access and understanding of tenant obligations, rights, and changes in HANO policies. Publishing such information in a form accessible by smartphone will likely be the most effective form for HANO residents. According to the Pew Research Center, individuals with low household incomes and levels of educational attainment rely on smartphones disproportionately for internet access. The report found that 13% of Americans with annual household incomes less than \$30,000 per year are smartphone dependent compared with just 1% of Americans with household incomes greater than \$75,000. Further, 12% of African Americans and 13% of Latinos are smartphone dependent according to the report, compared with 4% of whites. <http://www.pewinternet.org/2015/04/01/us-smartphone-use-in-2015/>.
  - b. Many HANO tenants are unaware of HUD sanctioned Family Obligations or have not had them adequately explained during their entry to the program. Subsequent unintentional or inadvertent violations of the Family Obligations can result in voucher termination for the entire household, therefore it is critical that all members of HANO-assisted households have adequate access to the rules governing their participation in HANO programs to maintain informed compliance with Family Obligations. Similarly, many HANO tenants are unaware of their right to a special Housing Quality Standards (HQS) inspection. As a result, participant families suffer from substandard housing conditions while they wait for their annual inspection. Having caseworkers as the sole providers of rules for clients diminishes access. Clients would benefit from being able to access the rules online or through a smartphone. Currently, clients have only a single hard copy of the rules and they are

not provided on the HANO website in an easily accessible form. For an example of a housing authority website that displays and explains the Family Obligations, see Housing Authority of the City of Austin HCV tenants webpage: <http://www.hacanet.org/HCV/tenantsindex.php>.

We thank you for your attention and look forward to discussing these recommendations further. We would appreciate a meeting with HANO staff to address our concerns.

Sincerely,



Laura Tuggle  
Executive Director



Chelsea Fitzgerald  
Vanderbilt Public Service Fellow