ANNUAL PHA PLAN

Fiscal Year Beginning 10/1/2022

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

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Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: HOUSING AUTHORITY OF NEW ORLEANS **PHA Code**: LA 001
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/1/2022
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
***Number of Public Housing (PH) Units** 2,188 **Number of Housing Choice Vouchers (HCVs)** 18,238
Total Combined Units/Vouchers 20,426
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

HANO's draft plans and policy revisions are posted on the following platforms
Agency's website at www.hano.org
HANO Facebook page at https://www.facebook.com/HANOHOUSING
HANO Facebook page at https://www.twitter.com/HANOHOUSING
HANO Constant Contact Email Group of Stakeholders

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia
Lead PHA:		

B.	Annual Plan Elements
B.1	**Revision of PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA? Y N ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs ☐ ☒ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☒ ☐ Financial Resources. ☐ ☒ Rent Determination. ☒ ☐ Operation and Management. ☐ ☒ Grievance Procedures. ☐ ☒ Homeownership Programs. ☒ ☐ Community Service and Self-Sufficiency Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☒ ☐ Asset Management. ☐ ☒ Substantial Deviation. *(see attached)* ☐ ☒ Significant Amendment/Modification *(see attached)*

B.1 (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): **Revised elements are captured below.**

Statement of Housing Needs and Strategy for Addressing Housing Needs

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

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

STATEMENT OF HOUSING NEEDS

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

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

Total Orleans Parish Households	**154,035**		Population slightly decreased from 154,895 to 154,035.
Owner Households	**73,035 (47% of Total)**		The number of homeowners increased from 72,890 to 73,035
Renter Households	**81,000 (53% of Total)**		The number of renters decreased from 82,005 to 81,000.
Orleans Parish Renter Households by Average Median Income (AMI) With Breakout of "Low Income Renter" Households			**Statistical Notations**
Extremely Low Income renter households (<=30% AMI)	26,310		
Very Low Income renter households (>30% but <=50% AMI)	12,985		
Low Income renter households (>50% but <=80% AMI)	13,475		
Subtotal Low Income Renter Households (<=80% AMI)	**52,770**		Of the total 81,000 Renter Households in Orleans Parish, 52,770 or 65% are classified as Low Income Renter Households
Other renter households (>80% but <=100% AMI)	6,125		
Other renter households (>100% AMI)	22,105		
Subtotal Other Renter Households (>80% AMI)	**28,230**		
Total Renter Households:	**81,000**		
Low income renter households who are **cost burden**	**39,485**		Of all 52,770 Low Income Renter Households, 39,485 or 75% are Cost Burdened.
Low income renter households with **housing problems**	**40,195**		Of all 52,770 Low Income Renter Households, 40,195 or 76% have Housing Problems

COST BURDEN:
Moderate cost burden is "rent comprising more than 30 percent of income". Severe cost burden is "rent comprising more than 50 percent of income".

HOUSING PROBLEMS:
A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS data: 1) housing units lacks complete kitchen facilities; 2) housing units lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.

Section 8 Tenant- Based Assistance Waiting Lists

Housing Needs of Families on the Housing Choice Voice Waiting List		
Waiting list type: ***Section 8 tenant-based assistance (2016 Waiting List)***		
	# of families	% of total families
Waiting list total***	15,889	
Extremely low income <=30% AMI	11,667	73.43%
Very low income (>30% but <=50% AMI)	2,938	18.49%
Low income (>50% but <80% AMI)	1,139	7.17%
Over income (>80% AMI)	145	0.91%
Families with children	7,223	45.46%
Elderly families	1,627	10.24%
Families with Disabilities**	649	4.08%
Race/ethnicity – African American	14,678	92.38%
Race/ethnicity – White	623	3.92%
Race/ethnicity – American Indian	78	0.49%
Race/ethnicity –Hispanic	349	2.20%
Race/ethnicity – Asian	27	0.17%
Race/ethnicity – Native Hawaiian/Other Pacific Islander	37	0.23%
Race/ethnicity – None Listed	446	2.81%
Characteristics by Bedroom Size*		
No BR Selected	315	1.98%
1BR	7,576	47.68%
2 BR	5,112	32.17%
3 BR	2,355	14.82%
4 BR	454	2.86%
5 BR	67	0.42%
5+ BR	10	0.06%

**Bedroom size is the size that is requested by the applicant but has not been determined by HANO/HUD occupancy standards.*
***The disability count was based on applicants' self-reporting of disability status.*
****The waiting list total number consists of _____ applicants that are on both the HCVP and Public Housing waiting lists.*

Public Housing Waiting Lists

Housing Needs of Families on the Public Housing Waiting List		
	# of families	% of total families
Waiting list total*	17,268	100%
Extremely low income	14,093	82%
Very low income (>30% but <=50% AMI)	2,681	15%
Low income (>50% but <80% AMI)	427	2%
Over income (>80% AMI)	67	1%
Families with children	15097	87%
Elderly families	1738	10%
Families with Disabilities**	433	3%
Race/ethnicity – African American	15452	89%
Race/ethnicity - White	680	4%
Race/ethnicity – American Indian	62	1%
Race/ethnicity –Hispanic	296	<2%
Race/ethnicity –Asian	28	<1%
Race/ethnicity – Native Hawaiian / Other Pacific Islander	10	<1%
Race/ethnicity – None Listed	740	4%
Characteristics by Bedroom Size (Public Housing Only)		
1BR	7528	44%
2 BR	4613	27%
3 BR	2819	16%
4 BR	1460	9%
5 BR	563	3%
5+ BR	285	1%

**Some families may appear on multiple Public Housing site-based wait lists. The overall number of families on all Public Housing site-based wait lists is 17,268. For purposes of this analysis, applicants who were on multiple Public Housing site wait lists are counted only once in the above statistics to avoid skewing the characteristics of the wait list population.*
***The disability count may be underreported based on applicants' self-reporting of their disability status.*

Strategies for Addressing Disparities in Housing Needs

Assessment of Fair Housing (AFH) Plan

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

To address these barriers, the AFH Plan proposes to:

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

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

Statement of Financial Resources

Anticipate Financial Resources for FYB Oct. 1, 2022 Planned Sources and Uses			
		Planned $	**Planned Uses**
1	**Federal Grants**		
	Public Housing Operating Fund	$9,228,064	
	Capital Fund Program	$11,000,000	
	Replacement Housing Factor Funding	$0	
	Annual Contributions for Tenant-Based Assistance (HCV HAP)	$177,726,904	
	Annual Contributions for Tenant Based Vouchers all Administrative Fees	$11,814,362	
	FEMA	$3,000,000	
2	**Prior Year Federal Grants (unobligated funds only)**		
	Capital Funds (CFP & RHF)	$18,753,200	
	CNI	$0	
	Hope VI	$0	
	901 funds	$0	
3	**Public Housing Dwelling Rental Income**		
	Tenant Rental Revenue	$900,807	
4	**Other Income (list below)**		
	Interest Income	$30,000	
	State and Local	$0	
	Misc. Income	$1,135,000	
	Total sources	$233,588,337	

Operation and Management

Following is a summary of policy changes proposed to facilitate the operation and management of HANO's programs. These policy changes are contained in draft redline copies of HANO's Housing Choice Voucher Program (HCV) Administrative Plan. There are no policy changes for the Public Housing (PH) Admissions and Continued Occupancy Policy (ACOP). Both documents are available on the Agency's website at www.hano.org.

HCV Administrative Plan Policy Changes

No Revisions to the HCVP Administrative Plan are anticipated for fiscal year beginning October 1, 2022

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

HANO is making the following policy changes to ACOP:

- All third parties contracted after October 1, 2022 who are managing public housing units must adhere to HANO's Criminal Background policy.

Community Service and Self-Sufficiency Programs

	Name of Program	Description of Program	Service area	Target age	Outcomes
ARTS	Arts Enrichment (planning)	HANO will partner with local arts enrichment programs, local universities and other stakeholders to facilitate an arts enrichment program for youth.	Fischer/Florida	Ages 10-19	Increased participation in programs that add to and improve participation in the creative arts to increase educational and self-sufficiency outcomes
SPORTS	**Name of Program**	**Description of Program**	**Service area**	**Target age**	**Outcomes**
	Life Skills/Health & Fitness/Academic Enrichment (planning)	HANO, in concert with its CLPHA/UHC grant, will partner with local health/fitness/soft skills supportive service providers to promote healthy lifestyles and nutrition.	Fischer/Florida	Ages 8-19	Increased participation in programs that add to and improve health, educational and self-sufficiency outcomes
HEALTH	**Name of Program**	**Description of Program**	**Service area**	**Target age**	**Outcomes**
	Gramercy CHW Program	HANO facilitates a partnership between Gramercy and local Community Health Worker providers DePaul and Ashe' to provide healthcare related supported services to the Bienville Basin and Lafitte properties.	Bienville Basin & Lafitte	Ages 18 & up	Increase healthcare outcomes for residents
	Council of Large Public Housing Authorities (CLPHA)-UnitedHealthcare (UHC)-HANO Collaborative Catalyst Initiative	UHC is expanding on its long-term collaboration with the CLPHA by engaging public housing agencies (PHAs), federally qualified health centers (FQHCs), and community-based organizations (CBOs) in their mutual commitment to serve as a catalyst to close gaps in care, address health equity challenges, and encourage a greater positive health impact in local communities.	All properties & HCVP clients	Ages 18 & up	Increase resident relationship/accessibility with primary care providers, increase positive mental/physical/nutritional health outcomes for families, and provide supportive service offerings for pregnant and expecting mothers

	Name of Program	Description of Program	Service area	Target age	Outcomes
ACADEMICS	After School Tutoring (planning)	HANO, in concert with retired educators and other educational enrichment stakeholders in the community, will work to facilitate after school tutoring for school aged youth as an opportunity to help with the attainment of knowledge learned during the school day to prevent academic regression.	Fischer/Florida	Ages 8-19	Increased participation in programs that add to and improve educational outcomes
	College Tours	HANO annually hosts a college tour for high school juniors and seniors currently residing in HANO communities and participating in the HCVP program. Youth visit local/regional college campuses. They also attend personal development seminars with a focus on college readiness, leadership, and life skills during the college tour.	All properties & HCVP clients	Ages 16-19	Increase resident interest in post-secondary education
	Scholarship Program	The Scholarship is now open to ALL HANO assisted residents (Public Housing and HCVP/Section 8 Participants). Awardees must be a current high school senior in metro New Orleans, LA with plans to attend an accredited two or four year college/university or enroll in a trade or technical school. Residents that are interested in returning to or enrolling in college for the first time, or attending a trade school or technical college are also eligible to apply. Children of HANO employees living in Public Housing or participants in the HCVP are eligible to apply	All properties & HCVP clients	Ages 16-19	Participation in the scholarship program creates positive outcomes for education attainment and may help to alleviate personal financial burdens that are associated with post-secondary education.

	Name of Program	Description of Program	Service area	Target age	Outcomes
MOBILITY	Homeownership	HANO's Homeownership Program was created to assist public housing and HCVP residents to become first-time homebuyers.	HCVP clients	Ages 18 & up	Increase homeownership rate for current HCVP program participants
	Family Self Sufficiency	The Family Self-Sufficiency Program was created by HUD for low-income families and individuals of Public Housing or the Housing Choice Voucher Program. It was designed to assist residents with setting goals and developing a plan to achieve economic independence by linking locally available resources and supportive services necessary to overcome obstacles preventing self-sufficiency to FSS program participants.	All properties & HCVP clients	Ages 18 & up	Increase self-sufficiency outcomes through goal-making and follow through to realize a financial incentive to alleviate personal financial burdens
	ROSS	The ROSS grant program is a HUD funded program that allows public housing authorities to partner with community based supportive service organizations with the purpose of helping individuals and families in public housing achieve self-sufficiency. In order to be eligible for ROSS services, the residents must reside in a PHA unit and be assigned to a specific Asset Management Project (AMP). The housing authority employs service coordinators to work directly with residents to assess needs and identify barriers to self-sufficiency.	PHA clients	Ages 18 & up	Service coordinators also work to link residents to training opportunities and services to support individuals in attaining educational, professional, health, and financial goals that can lead to greater economic and housing stability.

	Name of Program	Description of Program	Service area	Target age	Outcomes
	Entrepreneurship	Residents participating in the entrepreneurship program will receive a free, 10-week intensive entrepreneur training focused on the enhancement of individual strategies for the innovative, new business owner. Similar to the inaugural graduates, the program participants will attend interactive sessions and weekly workshops on how to start, plan and grow a business, and also learn how to build credit to increase the possibility of securing business loans.	All properties	Ages 18 & up	Increase self sufficiency outcomes through goal-making and follow through to realize business ownership potentially create a generational paradigm shift in personal and family finances and quality of life.
MOBILITY	Jobs Plus	The purpose of the Jobs Plus Initiative program is to develop locally-based, job-driven approaches to increase earnings and advance employment outcomes through work readiness, employer linkages, job placement, educational advancement technology skills, and financial literacy for residents of public housing.	Bienville Basin and Lafitte	Ages 18 & up	The place-based Jobs Plus Initiative program addresses poverty among public housing residents by incentivizing and enabling employment through income disregards for working families, and a set of services designed to support work including employer linkages, job placement and counseling, educational advancement, and financial counseling. Ideally, these incentives will saturate the target developments, building a culture of work and making working families the norm.
	Summer Youth Employment	HANO facilitates a Summer Youth Employment program for young people ages 14-21 to introduce them to the world of work and provide soft skills and other workforce related enrichment for success in the workplace.	All properties & HCVP clients	Ages 14-21	Employment opportunities create an introduction to the world of work for young people which helps to create positive outcomes and the potential for financial generational paradigm shifts within a family.

DEFINITION OF "SUBSTANTIAL DEVIATION" AND "SIGNIFICANT AMENDMENT OR MODIFICATION"

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

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

(i) Criteria for defining "Substantial Deviation" from the 5-Year Plan:

- A major change in the direction of HANO pertaining to its mission and goals would constitute a "substantial deviation" from the Agency's 5-Year Plan.

- Examples include the undertaking of new program activities, development strategies, or financing initiatives that do not otherwise further HANO's stated mission and goals as articulated in the 5-Year Plan.

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

- Changes to rent, admission policies, or organization of the waiting list(s) in the Public Housing Program that will impact more than 10% of applicants and/or households assisted under the Program.

- Changes to rent, admission policies, or organization of the waiting list(s) in the Housing Choice Voucher Program that will impact more than 10% of applicants and/or households assisted under the Program.

- Substantial changes to demolition, disposition, designated housing, homeownership, or conversion activities identified in the current HUD-approved Annual or 5-Year Plans.

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

- Proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance proposals will be considered significant amendments to the CFP 5-Year Action Plan.

- Additions of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceed $3 million.

(iv) Exceptions:

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

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

B.1 (c)	**The PHA must submit its Deconcentration Policy for Field Office review.**

DECONCENTRATION OF POVERTY AND INCOME-MIXING

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

Deconcentration and Income-Mixing Goals

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

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

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

Deconcentration applies to transfer families as well as applicant families.

Step for Implementation

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

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

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

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

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

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

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

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

Deconcentration Compliance

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

B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☒ ☐ Hope VI or Choice Neighborhoods. ☒ ☐ Mixed Finance Modernization or Development. ☒ ☐ Demolition and/or Disposition. ☐ ☒ Designated Housing for Elderly and/or Disabled Families. ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance. ☐ ☒ Conversion of Public Housing to Project-Based Assistance under RAD. ☐ ☒ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers (*Demonstration Program at Guste Homes only*). ☐ ☒ Non-Smoking Policies. ☐ ☒ Project-Based Vouchers. ☒ ☐ Units with Approved Vacancies for Modernization. ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Hope VI or Choice Neighborhoods

HANO is considering applying for a CNI planning grant for one of its public housing communities.

Mixed Finance Modernization or Development

☒ Yes ☐ No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
If yes, list developments or activities below:
B.W. Cooper Phase 2, Florida Phase 2, Iberville Choice Neighborhoods Initiative – City Square Phase 2, Faubourg Lafitte, and Fischer.

Demolition and/or Disposition

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

Demolition/Disposition Activity Description
Bywater/Marigny

Activity type: Demolition ☐ Disposition ☒ (Scattered Sites)

LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001025	4200 Royal; 2522 N Rampart 2818 Burgundy; 2819 Dauphine; 710 Clouet	8/12/2014 3/11/2010	0 - vacant lot	Part of development	FY2019-2024
LA001036	1740-42-44-46 Poland; 1830-32-34-36 Poland	3/11/2010	0 - vacant lot	Part of development	FY2019-2024
LA001044	600 France; 601 Mazant; 608 France; 611 Mazant; 616 France; 620 France; 621 Mazant; 631 Mazant; 641 Mazant; 644 France; 651 Mazant	8/12/2014	0 - vacant lot	Part of development	FY2019-2024

Demolition/Disposition Activity Description
Iberville Choice Neighborhoods Initiative (CNI) Trapezoid

Activity type: Demolition ☐ Disposition ☒ (Scattered Sites)

LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001025	1814 Bayou Rd; 1818 Bayou Rd; 2427 Ursulines; 2115-17 St Ann	8/12/2014	0 - vacant lot	Part of development	FY2019-2024

Demolition/Disposition Activity Description
Westbank

Activity type: Demolition Disposition ☒ (Scattered Sites)

LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001020	1500-06 Hendee; 1508-14 Hendee; 1524-30 Hendee; 1532-38 Hendee; 1814-20 Lawrence; 1815-21 Ptolemy	8/12/2014	0 - vacant lot	Part of development	FY2019-2024
LA001025	717 DeArmas	8/12/2014	0 - vacant lot	Part of development	FY2019-2024

Demolition/Disposition Activity Description
Westbank

Activity type: Demolition ☐ Disposition ☒ (Scattered Sites)

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

Demolition/Disposition Activity Description
West Carrollton

Activity type: Demolition ☐ Disposition ☒ (Scattered Sites)

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

Demolition/Disposition Activity Description
Uptown

Activity type: Demolition ☐ Disposition ☒ (Scattered Sites)

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

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

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

Activity type: Demolition Disposition ☒ (Scattered Sites)

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

Demolition/Disposition Activity Description
New Orleans East

Activity type: Demolition Disposition ☒ (Scattered Sites)

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

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

Demolition/Disposition Activity Description Desire					
Activity type: Demolition ☐ Disposition ☒					
LA # or AMP #	**Development Name/Address**	**Application Status: Approved**	**Units Affected**	**Coverage of Action**	**Projected Timeline**
LA001014	Desire	12/29/2000	0 - vacant lot	Part of development	FY2022-2026

Demolition/Disposition Activity Description Fischer					
Activity type: Demolition ☐ Disposition ☒					
LA # or AMP #	**Development Name/Address**	**Application Status: Approved**	**Units Affected**	**Coverage of Action**	**Projected Timeline**
LA001016	Fischer	11/24/2004	0 - vacant lot	Part of development	FY2023-2026

Demolition/Disposition Activity Description Florida					
Activity type: Demolition ☐ Disposition ☒					
LA # or AMP #	**Development Name/Address**	**Application Status: Planned Submittal**	**Units Affected**	**Coverage of Action**	**Projected Timeline**
LA001004 and LA0010011	Florida	12/1/2022	0 - vacant lot	Part of development	FY2019-2025

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

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

Designated Housing for Elderly and Disabled Families.

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

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

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

Project-Based Vouchers

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

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

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

HANO currently has 2,093 units under Housing Assistance Payments (HAP) contracts and anticipates entering into contracts for an additional 392 units in the coming fiscal year. The planned PBV units are located in the Gentilly and New Orleans East areas of the city.

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

Redmellon Renewal Homes	Scattered Sites	2/18/2011	11
River Garden Elderly Apartments	2017 Laurel St. 70130	4/21/2009	56
Rosa F. Keller Building	2222 Tulane Ave 70119	7/6/2012	15
Roman Bienville – Lafitte	1810 Bienville St. 70112	6/9/2015	2
Roman Bienville – Lafitte	219 N. Roman St. 70112	6/11/2015	5
Roman Bienville – Lafitte	1810 Bienville St. 70112	6/24/2015	1
Roman Bienville – Iberville	1830 Bienville St. 70112	5/14/2015	9
Saint Ann Square 2017	2123 Ursulines Avenue 70119	8/14/2020	59
Sacred Heart at St. Bernard	1720 St. Bernard Ave. 70116	9/21/2018	13
Savoy Place I	2906 Desire Parkway 70126	2/1/2019	113
Savoy Place II	2906 Desire Parkway 70126	3/30/2011	89
SBP L9	Scattered Sites 70117	9/23/2021	15
SBP St. Peter St.	2645 Toulouse St 70119	4/3/2020	16
Skyview Townhomes	Scattered Sites 70126	12/31/2010	15
The Crescent Club	3000 Tulane Ave 70179	2/4/2011	30
The Preserve New Orleans I LLC	4301 Tulane Ave 70179	2/4/2011	27
Treasure Village	2906 Desire Parkway 70126	7/1/2014	26
Tudor Square Elderly	3011 Milan St 70125	6/1/2012	41
Walnut Square	8501 N I-10 Service Rd 70127	7/13/2009	48
Wisdom Manor	8900 Quince St 70118	2/4/2012	19
Total Units Under PBV Contract			**2,093**

Units Approved for Vacancy for Modernization

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

B.3 CIVIL RIGHTS CERTIFICATION

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations,* will be submitted by the PHA as an electronic attachment to the PHA Plan.

Civil Rights Certification
(Qualified PHAs)

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

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning **October 31, 2022** *in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

Housing Authority of New Orleans	**LA 001**
PHA Name	PHA Number/HA Code

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

Name of Executive Director:	Name of Board Chairperson:
Evette Hester	**Carol G. Johnson**
Signature Date	Signature Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

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

B.4 Most Recent Fiscal Year Audit.

(a)Were there any findings in the most recent FY Audit?

Y	N
☐	☒

(b) If yes, please describe:
The HANO audit for FY 2020 has been completed and there were no findings, recommendations or questioned costs.

The HANO audit for FY 2021 is in process and will be completed by March 31, 2022.

HANO 5 YEAR GOALS

October 1, 2020 –September 30, 2025

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

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

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

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

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

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

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

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

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

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

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

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

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

Goal 7: Reposition underperforming assets

Objective 7.1 Participate in Asset Repositioning training conducted by HUD and other industry organizations.

Objective 7.2 Develop criteria for identifying and prioritizing underperforming properties and for determining appropriate repositioning strategies

Objective 7.3 Utilize the newly-developed criteria to analyze operational, capital, and financial needs, and to delineate short and long-term approaches for impacted properties.

Objective 7.4 Implement planned repositioning with continuous monitoring of property performance

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

Objective 8.1 Expand existing software to provide tenant portal services in areas such as virtual wait list applications, no-contact recertifications, and electronic rent payments

Objective 8.2 Convert office desktop computers to touch screen laptop docking stations that can be readily adapted for telework purposes

Objective 8.3 Procure text blast and robocall technology to electronically send up-to-date notices to all tenants, landlords, and business partners

Objective 8.4 Utilize document imaging software to convert program documents to an electronic format, ultimately reducing file storage and expediting record retrieval

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

Objective 9.1 Increase homeownership opportunities for HANO clients

Objective 9.2 Increase client participation in the Family Self-Sufficiency (FSS) Program

Objective 9.3 Expand opportunities for client employment and/or entrepreneurship including participation in Section 3 programs

Objective 9.4 Increase attainment of High School Equivalency (HSE; formerly GED) credentials as well as attainment of college level education for all HANO clients

Objective 9.5 Increase the percentage of tenants living in low poverty neighborhoods

Objective 9.6 Increase self-sufficiency program awareness and participation among clients who are members of vulnerable population groups

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

Objective 10.1 Research and implement cost savings related to central office space needs and relocation possibilities.

Objective 10.2 Develop a team of policy/grant writers to seek grants to support all functions of HANO

Objective 10.3 Continue partnerships with third parties to fund development projects and other Agency initiatives.

Objective 10.4 Study best practices and implement measures that will further HANO's financial sustainability**.**

B5. HANO PROGRESS PREPORT ON 5 YEAR GOALS

Goal 1: Develop a long-term affordable housing expansion and preservation strategy for HANO's portfolio.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTVES		**PROGRESS TOWARDS GOALS**
Objective 1.1	**Plan for redevelopment of scattered sites and other vacant parcels utilizing a neighborhood-centric approach**	Redevelopment of 18 scattered sites in the Bywater area has begun which will include 146 units (82 affordable rentals; 54 market rate rentals; 5 affordable homes; and 5 market rate homes). Development of 37 properties in the West Carrollton and Uptown neighborhoods has begun as well.
Objective 1.2	**Seek publicly-owned vacant lots within close proximity to develop live, work, and play amenities.**	City Square 162 is a mixed- income, multifamily building with 76 apartments that are close to transit, the central business district, and the Lafitte Greenway. Development was completed in August 2021.
Objective 1.3	**Explore opportunities for self-development by HANO.**	Self-development is not feasible at this time.
Objective 1.4	**Leverage resources to build new housing and modernize existing housing.**	• HANO has leveraged its project based vouchers (PBV) to develop new housing. As part of the CNI redevelopment, 420 PBV units have been constructed in Tremé. • Thirty-six PBV units are in predevelopment. • In the Bywater and Carrollton neighborhoods, 34 and 77 PBV vouchers are planned for new construction, respectively.
Objective 1.5	**Implement sustainability measures to preserve and protect HANO's portfolio**	HANO has increased the term of PBV contracts in accordance with HOTMA regulations that allows PBV contracts to increase from 20 years to 25 years.

Goal 2: Expand HANO's affordable housing portfolio to include rental and homeownership units.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 2.1	**Facilitate development of 1,000+ affordable housing units during the plan period.**	HANO is on target to develop 1,000 affordable housing units between 2021 and 2025. HANO developed 236 units in 2021 including 76 rental units at City Square 162, 82 rental units in the Carrollton neighborhood, and 23 rental units at Faubourg Lafitte. HANO also expects to develop affordable homeownership units in Carrollton, Faubourg Lafitte, the Tulane/Gravier area, and Bywater.
Objective 2.2	**Continue growing the Project Based Voucher program as an incentivizing tool for new housing development**	HANO is steadily increasing the use of project based vouchers and has 430 "Agreements to enter into a HAP contract" (AHAP) that are expected to convert to HAP contracts in the next fiscal year. HANO has awarded 805 pending PBV awards.
Objective 2.3	**Increase the usage of homeownership vouchers to 5% of HCV households**	HANO has provided 515 homeownership vouchers which is 2.8% of HANO's 18,178 HCV allocated vouchers. HANO is working to increase usage to 5%.
Objective 2.4	**Recruit partners to provide down-payment assistance for homeowners and security deposit assistance for renters**	HANO has partnered with the City of New Orleans to provide down payment and closing costs subsidies to HANO assisted first- time homebuyers.
Objective 2.5	**Utilize Federal low income housing tax credits and other financing tools to support affordable housing development**	HANO's third-party development partners have secured low income housing tax credits "LIHTC" for the development of affordable housing. A total of 76 new units were completed at City Square 162. Another 23 units are being developed at Faubourg Lafitte. In addition development of properties in the Lower Garden District neighborhood is planned using 9% LIHTC.
Objective 2.6	**Utilize community land trusts to ensure long-term affordable homes**	HANO is considering the development of affordable housing in partnership with third party developers as well as organizations such as Crescent City Community land trust.

Goal 3: Improve customer service using training, technology, and community engagement.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 3.1	**Reduce transaction times for clients, landlords, and other business partners**	HANO implemented the use of DocuSign and created a Landlord Liaison to reduce transaction times for clients, landlords, and other business partners. HANO is implementing virtual orientations and briefings for new voucher holders to ensure understanding of the housing search and lease up process as well as landlord orientations to educate prospective participant landlords on the HCV Program.
Objective 3.2	**Establish a call center along with defined response times and tracking protocols**	HANO established a call center in March 2021 that is fully operational with staff who are trained to answer questions and track responses.
Objective 3.3	**Distribute quarterly customer satisfaction surveys to obtain feedback from internal and external customers**	HANO completed tenant surveys in 2020 as part of the ROSS grant application.
Objective 3.4	**Provide ongoing staff training in customer relations and interpersonal skill building**	All call center staff were trained on customer relations, fair housing, and HCV program details such as the Administrative Plan and Emphasys software.
Goal 4: Maintain High-Performer status in the Housing Choice Voucher Program and Public Housing Program		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 4.1	**Improve the Agency's performance under the Public Housing Assessment System (PHAS)**	HANO latest composite score of 75 was in 2017 which places the agency as an overall Standard Performer in the Public Housing Program. HANO is reorganizing the agency in efforts to increase PHAS scores.
Objective 4.2	**Retool HANO's asset management protocol to drive continuous improvement in all areas of property management**	HANO is in the process of retooling its asset management protocol to ensure that property managers focus on the day-to-day operations of rental properties while asset managers focus on the financial integrity and administrative viability of not only developments managed by HANO but those managed by third parties as well.

Objective 4.3	**Maintain high performer status under the Section 8 Management Assessment Program (SEMAP)**	HANO is currently a high performer under HUD's SEMAP assessment system. Under the latest assessment for FY 2019, HANO still has room for improvement in the Family Self-Sufficiency (FSS) category & QC inspections. The agency has hired a full time FSS Housing Specialist and has contracted with a third party to perform inspections. HANO will be a high performer for FY 2022 utilizing a HUD COVID waiver to carry forward its most recent SEMAP assessment.
Objective 4.4	**Ensure ongoing compliance monitoring and tracking of SEMAP and other HCV performance metrics**	Files are audited monthly for compliance monitoring and tracking of SEMAP indicators as well as other HCV metrics.
Objective 4.5	**Apply to become an MTW agency after achieving high performer status**	HANO plans to apply to Cohort 5 of the MTW program when it is announced.
Goal 5: Rebrand the Agency to improve HANO's public image.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 5.1	**Develop a rebranding strategy to strengthen HANO's image and foster positive perceptions of the Agency.**	HANO has developed a strategy to rebrand the agency which is updated periodically with additional tasks as new programs and projects are launched. Multiple tasks have been implemented, with others to follow this year. An annual calendar of opportunities has been created for 2022 and will be used as a guide to identifying and creating positive publicity stories for the agency.
Objective 5.2	**Create a new visual identity using social media and other platforms (website, Facebook, Instagram)**	HANO is currently utilizing Facebook, Twitter, and Instagram as social media platforms to provide updates, notices, features and activity information. A new website was launched in 2020 which is updated regularly. Will be undertaking an overall audit of the website in order to identify additional opportunities for user-friendly interaction and best placement of information.
Objective 5.3	**Enlist ambassadors and partnerships to help HANO achieve an active and engaging community presence.**	HANO staff were enlisted as Ambassadors in 2020. Ambassadors worked together with the Communications department to develop core values for the Agency and a plan to increase HANO's presence at community meetings in the Second quarter of 2021. As a result, HANO has partnered with the Mayor's Office of Neighborhood Engagement to distribute HANO materials during neighborhood events and activities throughout the city.

Objective 5.4	**Create and maintain a media kit to facilitate communication with press outlets**	HANO developed a digital agency fact sheet as well as posted information on HANO's Board of Commissioners, our Executive Director and Executive Staff all on our external website, which is all accessible to media. HANO is in the process of creating a general informational video on the successes of HANO and its residents to facilitate communication with press outlets. Anticipate the video being completed and uploaded later this summer.
Objective 5.5	**Share information about HANO initiatives through expanded participation in community and industry associations, at local and national levels**	• HANO provided materials on HANO initiatives and services to New Orleans residents during the City's Community Clean Up event and during community meetings hosted by the Mayor's Office of Neighborhood Engagement. Materials will also be shared at the New Orleans Public Libraries during the City's Community Office Hours. In addition, HCV staff joined City Council District E's Multi-family Housing Committee to offer expertise on housing quality standards. • HANO's Police Department has also shared information on HANO's initiatives through its participation in the City's Neighborhood Leaders' Roundtable discussion on public safety. • A monthly meeting is being established in 2022 between the City of New Orleans Communications Department, HANO's Communications Department, and the City's Housing Department.

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

HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		PROGRESS TOWARDS GOALS
Objective 6.1	**Upgrade to an integrated computer system that will encompass both programmatic and financial functionality**	HANO is launching a new financial system that will encompass both programmatic and financial functionality with implementation planned for summer 2022.
Objective 6.2	**Organize a new call center along with standard operating procedures, response times, and tracking protocols**	Early 2021 standing operating procedures for the call center were developed. We are tracking utilizing Cysco protocols which track response time, hold time, and the length of conversations. The number of calls received by each operator are also tracked and their pickup rate. HANO is exploring additional technological tools to enhance tracking and quality control of calls.

Objective 6.3	**Evaluate and update work processes to improve efficiency and reduce time to complete client and landlord transactions**	After an evaluation and due to the COVID-19 pandemic, HANO began allowing email correspondence, and Docusign documents to transact business which is in addition to in-person and mailed correspondence.
Objective 6.4	**Foster continuous performance improvement (CPI) by providing training and professional development opportunities to all staff**	HANO employees are provided with access to a comprehensive Learning Management System (LMS) that consist of an extensive library of professional development trainings. The trainings provide an enhancement to staffs' knowledge, skills, and abilities in many facets of professional development.
Goal 7: Reposition underperforming assets.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 7.1	**Participate in Asset Repositioning training conducted by HUD and other industry organizations.**	In early 2020, staff participated in Asset Repositioning Training and plans to continue this type of training in 2022.
Objective 7.2	**Develop criteria for identifying and prioritizing underperforming properties and for determining appropriate repositioning strategies**	HANO is in the process of identifying properties it has self-developed as well as those constructed in partnership with third-party developers to determine whether sites are underperforming.
Objective 7.3	**Utilize the newly-developed criteria to analyze operational, capital, and financial needs, and to delineate short and long-term approaches for impacted properties.**	HANO has begun analyzing operational costs at self-developed properties as well as properties developed by third-party partners to delineate short and long-term approaches to address the individual needs of each site. Once a plan has been established and implemented, HANO will continue to identify and review its portfolio to develop similar strategies for any other sites that may need repositioning.
Objective 7.4	**Implement planned repositioning with continuous monitoring of property performance**	HANO has begun analyzing operational costs at its self-developed properties as well as properties developed by third-party partners to delineate short and long-term approaches to address the individual needs of each site.
Goal 8: Upgrade technology to streamline business processes including updating hardware and software.		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**

Objective 8.1	**Expand existing software to provide tenant portal services in areas such as virtual wait list applications, no-contact certifications, and electronic rent payments**	HANO has implemented an applicant portal that allows a virtual wait list. A tenant portal is under development.
Objective 8.2	**Convert office desktop computers to laptop docking stations that can be readily adapted for telework purposes**	All staff have been converted from desktops to either laptops or docking stations.
Objective 8.3	**Procure text blast and/or robocall technology to electronically send up-to-date notices to all tenants, landlords, and business partners**	HANO procured and implemented text blast technology to electronically send notices.
Objective 8.4	**Utilize document imaging software to convert program documents to an electronic format, ultimately reducing file storage and expediting record retrieval**	The Legal Department is managing the contract to image the historical board documents. Under that contract, the bound volumes of the historic board documents will be scanned and converted to electronic format in March 2021.
Goal 9: Implement sustainable self-sufficiency programs that create economic mobility and generational wealth		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**
Objective 9.1	**Increase homeownership opportunities for HANO clients**	HANO has placed homeownership applications on-line at hano.org. A dedicated homeownership counselor responds to applicants and assist them with navigating the homeownership process.
Objective 9.2	**Increase client participation in the Family Self-Sufficiency (FSS) Program**	HANO applied and was awarded a grant to increase from one FSS coordinator to two coordinators. Both coordinators will work to recruit additional clients to the FSS program.
Objective 9.3	**Expand opportunities for client employment and/or entrepreneurship including participation in Section 3 programs**	HANO is continuing its Resident Entrepreneur Training Institute (RETI) that helps residents develop and implement business ideas. HANO also continues its Section 3 job opportunities and on-site construction training.
Objective 9.4	**Increase attainment of High School Equivalency (HSE; formerly GED) credentials as well as attainment of college level education for all HANO clients**	HANO has partnered with the Adult Education Program at Delgado Community College, TCA, and Hope House to provide education services to HANO clients. Virtual classes are also available.

Objective 9.5	**Increase the percentage of tenants living in low poverty neighborhoods**	• HANO has established exception payment standards based on the established Small Area Fair Market Rents (SAFMRs) for eight zip codes within HANO's jurisdiction to encourage better access to low poverty areas. • HANO received HUD's Mobility Demonstration Program grant. The program is funded at 3.9 million and is designed to increase the percentage of tenants living in low poverty areas. The program is slated to start in June 2022.
Objective 9.6	**Increase self-sufficiency program awareness and participation among clients who are members of vulnerable population groups**	HANO applied and was awarded a grant to increase from one FSS coordinator to two coordinators. Having two coordinators will enable HANO to develop specific procedures targeting self-sufficiency of vulnerable populations including disabled individuals and formerly incarcerated individuals. As this is the 3rd year of the current FSS grant cycle, HANO plans on requesting FSS funding in the next cycle for an additional grant funded FSS coordinator position, if possible, which will help to meet the demand of our residents to participate in the FSS program.
Goal 10: Improve financial sustainability through conservative investments, cash management, partnerships, and grant opportunities		
HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES		**PROGRESS TOWARDS GOALS**

Objective 10.1	**Research and implement cost savings related to central office space needs and relocation possibilities.**	HANO's Asset Management department completed an evaluation of central office space. From this evaluation, HCV office spaces were reconfigured and call center staff were relocated to a central call center location.
Objective 10.2	**Develop a team of policy/grant writers to seek grants to support all functions of HANO**	HANO has sought more grants utilizing a team approach in the last fiscal year than in the previous five years. HANO has applied and received the FSS grant, ROSS grant, and the CNI supplemental grant. HANO also applied to be a part of HCV Mobility grant program and the W.K. Kellogg Race and Equity grant.
Objective 10.3	**Continue partnerships with third parties to fund development projects and other Agency initiatives.**	HANO partnered with third party developer MCMormack Baron to utilize LIHTC to construct City Square 162. HANO also has partnered with the Louisiana Fair Housing Access Center to apply for a grant that would allow HCV tenants more mobility into low poverty areas. To increase homeownership, HANO partnered with the City of New Orleans for its HCV clients to receive down payment and closing assistance through the City's soft-second mortgage program.
Objective 10.4	**Study best practices and implement measures that will further HANO's financial sustainability.**	HANO is studying best practices as a part of developing asset repositioning strategies.

B.6 Resident Advisory Board (RAB) Comments

Plan Consultation Meeting – _____

Date	RAB Comments	HANO Response

Public Hearing Comments

Click *here* for audio of Public Hearing on May 17, 2022

Stakeholder Comments

HANO
Housing Authority of New Orleans

June 14, 2022

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

Dear Ms. Hill:

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

PHA Annual Plan

1. We continue to be eager to continue our partnership to address segregation in the HCVP program through the HUD mobility demonstration grant and congratulate you on your efforts to up to this point.

   HANO Response: We look forward to working with you on the HCV Mobility program to help our clients move to opportunity areas.

2. It is worth noting that in the Statement of Needs, both the HCVP and public housing wait lists report that nearly half of all households require a one-bedroom apartment and another 32% or 27%, respectively, require a two bedroom apartment. As you consider future developments, award project-based vouchers (PBVs), and engage in rehab work, we urge you to ensure that the unit mix of these buildings matches these needs for families on the waitlist.

   HANO Response: We understand your concern regarding availability of one and two bedrooms units for HANO clients. Please note that HANO and its co-developer/partners not only rely on waiting list data but also relies on market studies and funding to determine the unit mix when developing/restoring affordable housing to ensure that it meets the need of the community.

3. We appreciate HANO's response last year to our comment letter, stating that the agency has begun awarding extra points to proposed PBV units in low- poverty neighborhoods to advance its commitment to affirmatively further fair housing. This is great news and we

would love to review the scoring criteria documents that describes how these extra points are awarded.

LaFHAC assisted the New Orleans Office of Community Development (OCD) with a similar scoring effort last year in their Notice of Funding Availability for affordable rental developments. That office accepted our recommendation of awarding the most points to developments sited in high-opportunity areas, as designated by "A" and "B" markets in the 2021 Market Value Analysis (MVA), and awarding slightly less points to developments in gentrifying areas, as designated by "C," "D," and "E" block groups in the MVA that are adjacent to "A" or "B" markets (block groups separated by a canal or waterway would not count as adjacent). The MVA has the benefit of being updated regular and includes granular real estate data not captured by the Census or CHAS data.

HANO Response: Thank you for offering to provide insight on scoring for HANO Request for (RFP) for PBV vouchers. RFPs are posted publicly along with scoring criteria. You can find prior solicitations and existing solicitations at hano.org. We welcome your input on any process improvements.

4. We also strongly suggest HANO reevaluate its now seven-year old scatter sites plan, given recent updates to the Comprehensive Zoning Ordinance that allow the development of 4-plexes by right in nearly all one- and two-family districts, as long as the developments contain at least one affordable unit. HANO owns many smaller lots in high-opportunity or gentrifying areas like the Bywater, Treme, and Uptown that may have previously been slated for-sale units or rented doubles. These properties may now be able to produce tow or four times as many units, given the zoning change. This sort of development may require slightly smaller unit sizes, but as we've noted earlier, families on HANO's waitlist are desperate for smaller units, especially one-bedrooms. This kind of development also aligns with the caps on the size of buildings that can utilize PBVs. These 4-plexes would be able to utilize PBVs for all four units, assisting developers in their construction and ensuring more HANO families can access neighborhoods of opportunity. We would also be remiss if we didn't remind HANO that research shows that the demographics and resources in an area where a building is located is far more predictive of its residents' success than the income or racial diversity with the building itself.

HANO Response: HANO agrees that we must revisit our scattered sites plan. We have begun analyzing our scattered sites plan in light of new zoning, new market data, and varying needs.

5. LaFHAC also continues to echo SLLS's concern about HANO's Deconcentration policy to establish a preference for admission of working families where the average income of a public housing community falls below the Established Income Range (EIR). We are concerned that this preference requires further research because it may discriminate against families with disabilities who are unable to work for disability-related reasons in violation of fair housing law and the ADA. As written, the policy lacks the "two way street" set out by federal regulations: not just raising incomes at the below average income developments,

but also promoting in-migration of lower income persons at the higher than average income developments. "Deconcentration of poverty and income mixing is promoted by a policy that provides for bringing higher income tenants into lower income developments and lower income tenants into higher income developments." 42 CFR 903.2(a). The policy should be edited to address these concerns.

HANO Response: Regarding HANO's working preference as it relates to families with disabilities, HANO states that in its Admissions and Continued Occupancy Policy (ACOP) that elderly and disabled families automatically receive the working preference to ensure no bias or discrimination occurs against families with disabilities who are unable to work. In addition, HANO's Deconcentration policy outlines the "two way street" as it begins with a statement in adherence to 42 CFR 903.2(a) by stating "HANO's admission policy is designed to provide for deconcentration of poverty and income mixing by bringing higher income residents into lower income developments and lower income residents into higher income developments." We are willing to review any proposed language that you may have that provides more clarity.

ACOP

1. We remain frustrated with HANO's slow progress in ensuring its exemplary criminal background screening policy is applied as broadly across its programs as possible. This is especially frustrating because there has been such tremendous progress at other agencies, like the Louisiana Housing Corporation, which passed an inclusive tenant screening policy last summer.

   We are grateful to see the new ACOP language requiring all third parties contracted after October 1, 2022 who are managing public housing units to adhere to the HANO policy. However, it's very confusing why it took HANO six years to make this change, despite advocates requesting it since the passage of the initial policy in 2016.

   Similarly, we see no reasonable explanation for why this suggested change does not also I include new mixed-income developments being planned on HANO land or financed with PBVs. This is the sixth year in a row that LaFHAC is noting this concern in our comments and despite multiple meetings and emails with HANO staff in the past year, a new policy for these developments is still not in place.

   The passage of the LHC policy should also assuage any fears HANO may have that somehow adopting this policy would reduce the pool of landlords willing to work with the agency on PBV developments. To begin with, HANO should know from its own successful policy that providing people with criminal records a fair chance at housing actually increases public safety and reduces recidivism. The new LHC policy is also potentially even more inclusive than HANO's policy and not a single developer spoke against it during multiple public hearings last summer. On the contrary, many spoke in favor or submitted letters of support. The LHC policy would also already apply to many of the developments HANO may be awarding PBVs to because those developments also use LHC tax credits

or other grants to finance the construction. Given this overlap, it only makes sense to create a consistent, uniform policy so that developers don't have to perform multiple levels of compliance.

As part of our commitment to fair housing, LaFHAC has expended significant time, effort, and political capital to defend many of HANO's scatter site developments against opposition. It would be deeply disappointing if HANO were to move forward with signing contracts with these developments without ensuring fair housing principles are enshrined in the tenant selection process as well.

If HANO fails to create a new policy and include it in the ACOP and your contracts with developers, many more applicants will surely be denied access to the hundreds of affordable units you are in the process of bringing online. This would also be a failure of HANO's duty to affirmatively further fair housing, especially given the agency's admission, as far back as 2013, that tenant screening practices that don't allow for second chances, disparately impact Black applicants.[1] That analysis is also supported by joint guidance issued by HUD and DOJ in 2016.[2]

A year ago, we commented that time is running out, as many of these developments have received most of their approvals and will be signing contracts with HANO soon. A year later, we continue to echo this concern. At least these two of these developments were recently awarded funds from the City of New Orleans that are contingent on them breaking ground by the end of the year. Therefore, we urge you to follow federal law and your own agency analysis and require any developer leasing land from or signing a PBV contract with HANO to adopt either HANO's criminal backgrounds screening policy or the LHC's tenant screening policy. This must be included or referenced in the contracts so that individuals who are wrongfully denied have a path to enforcing their rights.

HANO Response: HANO appreciates your spirited comment. HANO will be working with its outside counsel to evaluate your recommendation as preexisting properties with executed contracts requires an in depth review. It is our position that PBV contractors that also have tax credits will be required to follow LHC criminal background policy and that new mixed-come properties developed after October 1, 2022 will fall under the new policy.

2. Outside of criminal backgrounds screening, LaFHAC has general concerns about the level of deference afforded to third party owners and managers. Public housing tenants living in third party-managed sites should have the same protections as public housing tenants living in HANO owned sites. SLLS continues to see notices of adverse action issued by third party management companies that are noncompliant with federal law and HANO policy. In order to protect tenants at third party-managed sites, language should be added to the ACOP requiring third party managers to provide (a) contact information for SLLS, and (b) contact information for the property's HANO Asset Manager, on all notices of adverse action. In addition, third party operators should be required to submit their form notices of adverse action to HANO each year to ensure compliance with the ACOP and HUD regulations.

HANO Response: We appreciate your comment. HANO will review all third-party adverse notices to ensure compliance with policies, regulations and applicable laws.

HCVP Administrative Plan

1. Last year, we supported a proposed change in the HCV Administrative Plan to ensure families on the wait list have 30 days to respond before being removed, however that change appears not to have been adopted. The current Admin Plan only requires 14 calendar days of notice before families are removed (page 53). The Plan also requires that the family's response must be "in writing." Families on the waitlist are nearly all housing insecure and are more likely be vulnerable to eviction or otherwise forced to move often. It is impractical and unfair to have their access to stable affordable housing be determined by a short waiting period, communicated through postal mail. We strongly urge HANO adopt the 30 day change and to use text messages and email communication to confirm whether people will remain on the wait list.

   HANO Response: HANO is pleased that you support the change in the HCV Administrative Plan to ensure families on the waiting list have 30 days to respond before being removed. It seems that the Administrative Plan on the HANO website was not updated. Thank you for alerting us to the oversite. HANO will continue to utilize the standard method of mailed letters to correspond with waiting list applicants as required for official notice but will continue to utilize additional ways to augment postal correspondence including text messaging and email technology.

2. HANO's local preferences for homeless individuals, survivors of domestic violence, and people with disabilities have been excellent past additions to the Admin Plan. We would also continue to ask HANO to consider implementing a reentry preference for formerly incarcerated individuals who frequently struggle to find safe, affordable housing in New Orleans.

   Last year, HANO responded to this request by noting that homeless individuals, survivors of domestic violence and people with disabilities are either protected classes or targeted groups via HUD regulations while suggesting that formerly incarcerated individuals are not. In fact, formerly incarcerated individuals are specifically noted as a group that "encounter significant barriers to securing housing" in HUD's guidance on criminal background screening procedures.3 That guidance also notes that in many instances people with criminal records are protected by the Fair Housing Act because policies have a disparate impact on African Americans, a protected class. This is very similar to the Fair Housing Act protections extended to survivors of domestic violence, who are disproportionately women and protected because sex is a protected class.

   HANO Response: HANO appreciates your support of preferences for homeless individuals, survivors of domestic violence, and people with disabilities as these groups

are either mentioned as a protected class or as a targeted group via HUD federal regulations. Incorporating and implementing a reentry preference for the formerly incarcerated would move formerly incarcerated individuals above residents without any criminal background which HANO does not support as many of our residents have been waiting for years for affordable housing as applicants on the Housing Choice Voucher (HCV) and Public Housing waiting lists.

3. We continue to encourage HANO to add nonworking air conditioning when temperatures rise to a certain level as an emergency condition requiring a 24- hour repair. An acceptable criterion would be when the heat index rises to 100 degrees Fahrenheit, the point at which the National Weather Service issues a heat advisory. We appreciate the Admin plan provisions that allow families to request special inspections, but reemphasize that the lack of a cooling system on high heat days can present as much of a health hazard as lack of heat in the winter, and should be treated as such. HANO should seek approval from HUD to add nonworking air conditioning when temperatures rise to a certain level as an emergency condition requiring a 24-hour repair.

   HANO Response: HANO has included safe cooling systems as a requirement under the Housing Choice Voucher (HCV) program. The HCV Administrative Plan contains provisions for participant families, landlords, and other stakeholders to request special inspections as a result of air conditioning or other problems identified between annual inspections. HANO has determined that requiring a 24 hour repair for nonworking air conditioners is not practical. At the height the cooling season, it has been HANO's experience that contractors who repair cooling systems cannot guarantee a 24-hour repair for various reasons. This situation has been exacerbated by supply chain and labor shortages.

4. We're grateful that HANO agreed to review its disability definitions, but continue to urge the agency to use the more inclusive definition of disability under the Fair Housing Amendments Act throughout its plans. That definition is a "physical or mental impairment that substantially limits one or more major life activities." See 42 U.S.C. § 3601 et seq.; 42 U.S.C. § 12102. We believe a broader definition of disability, combined with the other criteria listed, will provide for a more effective preference program that better serves vulnerable people who frequently have difficulty obtaining housing. We suggest the following edit (in bold):

   Non-elderly person with disabilities (for purposes of determining eligibility under HANO's preference): A person 18 years of age or older and less than 62 years of age, and who:

   1. **Has a disability, as defined in 42 U.S.C. § 423; or**
   2. **Has a disability, as defined in 42 U.S.C. § 3602(h); or**
   3. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that: a. Is expected to be of long- continued and indefinite duration; b. Substantially impedes his or her ability to live independently, and c. Is of such a nature that the ability to live independently could be improved by more

suitable housing conditions; or d. Has a developmental disability as defined in 42 U.S.C. 6001.

In addition, the definition of "People with Disabilities" cites the proper definition of "individual with handicaps" under fair housing implementing regulation 24 CFR 8.3. However, it goes on to state that the definition "does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes)." This statement also appears in the Eligibility Appendix. Under the Fair Housing Act past alcohol or substance use disorder may be considered a disability, especially if the tenant has undergone intervening treatment and are in recovery. We are concerned that carving out a certain subsection of people with disabilities for ineligibility may violate fair housing laws. We continue to suggest removal of this language.

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

> People with Disabilities: A person who has a disability as defined in 42 U.S.C. 423 or a developmental disability as defined in 42 U.S.C. 6001. Also includes a person who is determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long-continued and indefinite duration, substantially impedes the ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for people with disabilities, means and "individual with handicaps" as defined in 24 C.F.R. 8.3. Definition does not exclude people who have AIDS or conditions arising from AIDS, but does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes). See "Individual with handicaps."

5. The ACOP contains important language that "an arrest record alone will not be used for lease termination" in accordance with HUD guidance. However, the Administrative Plan lacks this critical language, though it does say that a conviction will be afforded more weight than an arrest. HANO should extend its policy about arrests to evictions and subsidy terminations in the PBV program, and to subsidy terminations from the HCV program. In other words, in accordance with HUD guidance, an arrest record alone is insufficient to

support lease termination for criminal activity in the PBV program, or to support subsidy termination in the HCV or PBV program.

HANO Response: HANO is aware that PIH Notice PIH 2015-19 details that an arrest record alone is not itself an acceptable reason for denying that person admission, terminating their assistance, or evicting tenants in public or federally-assisted housing. HANO, in its Administrative plan, does not support use of arrest records alone to terminate. The Administrative Plan provides that "HANO will terminate assistance if a preponderance of the evidence indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted. Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence can be considered credible evidence." Therefore, the HCV Administrative Plan is clear that an arrest record alone will not be used for lease termination.

I would like to take this opportunity to thank you for your comments, your advocacy and our continued partnership. If you have any questions, feel free to contact Ms. Jessica Knox at jknox@hano.org.

Sincerely,

Yvette Hester
Executive Director

HANO
Housing Authority of New Orleans

June 14, 2022

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

Dear Ms. Tuggle:

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

Administrative Plan

1. **Local Preferences:** We applaud HANO for implementing preferences for homeless individuals, survivors of domestic violence, and people with disabilities. In addition to these vulnerable populations SLLS continues to encourage HANO to add and implement a reentry preference for formerly incarcerated individuals who frequently struggle to find affordable, safe, habitable housing in New Orleans. Such a preference would help HANO meet its goal of supporting formerly incarcerated people and their families, as well as contribute to city and state efforts to reduce recidivism by addressing housing instability.

   HANO Response: Incorporating and implementing a reentry preference for the formerly incarcerated would move formerly incarcerated individuals above residents without any criminal background which HANO does not support as many of our residents have been waiting for years for affordable housing as applicants on the Housing Choice Voucher (HCV) and Public Housing waiting lists.

2. **Life Threatening/Emergency Conditions:** Currently lack of air conditioning or other cooling system is not considered a violation of HQS for which HANO will cite a landlord. In New Orleans when summer temperatures can rise above 100 degrees, lack of cooling system can present as much of a health hazard as lack of heat in the winter, especially for seniors, children, and people with disabilities. 24 C.F.R. § 982.401(a)(4)(ii)(B) states that HANO may obtain approval from HUD for "variations [to HQS acceptability criteria] because of local climatic or geographic conditions." HUD's Thermal Environment criteria states that "the dwelling unit must have and be capable of maintaining a thermal environment healthy for the human body." The system "must be able to provide adequate heat (and cooling if applicable)" 24 C.F.R. § 982.401(e). We encourage HANO to seek

approval from HUD to add nonworking air conditioning when temperatures rise to a certain level as an emergency condition requiring a 24-hour repair. An acceptable criterion would be when the heat index rises to 100 degrees Fahrenheit, the point at which the National Weather Service issues a heat advisory.

HANO Response: HANO has included safe cooling systems as a requirement under the Housing Choice Voucher (HCV) program. The HCV Administrative Plan contains provisions for participant families, landlords, and other stakeholders to request special inspections as a result of air conditioning or other problems identified between annual inspections. HANO has determined that requiring a 24 hour repair for nonworking air conditioners is not practical due to the need to contract with A/C experts to diagnose and initiate repair which under normal circumstances takes more than 24 hours to repair. Now that we are under a workforce and product shortages repairs of this nature most often exceed 24 hours to repair.

3. The ACOP contains important language that "an arrest record alone will not be used for lease termination" in accordance with HUD guidance. However, the Administrative Plan lacks this critical language, though it does say that a conviction will be afforded more weight than an arrest. HANO should extend its policy about arrests to evictions and subsidy terminations in the PBV program, and to subsidy terminations from the HCV program. In other words, in accordance with HUD guidance, an arrest record alone is insufficient to support lease termination for criminal activity in the PBV program, or to support subsidy termination in the HCV or PBV program.

HANO Response: HANO is aware that PIH Notice PIH 2015-19 details that an arrest record alone is not itself an acceptable reason for denying that person admission, terminating their assistance, or evicting tenants in public or federally-assisted housing. HANO, in its Administrative plan, does not support use of arrest records alone to terminate. The Administrative Plan provides that "HANO will terminate assistance if a preponderance of the evidence indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted. Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence can be considered credible evidence." Therefore, the HCV Administrative Plan is clear that an arrest record alone will not be used for lease termination.

4. **Glossary of Subsidized Housing Terms:** We question why HANO has chosen a restrictive definition of disability for the "non-elderly person with disabilities" preference, instead of the more inclusive definition of disability under the Fair Housing Amendments Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Amendments Act, namely a "physical or mental impairment that substantially limits one or more major life activities." See 42 U.S.C. § 3601 et seq.; 42 U.S.C. § 12102. We believe a broader definition of disability, combined with the other criteria listed, will provide for a more effective preference program that better serves vulnerable people who frequently have difficulty obtaining housing. We suggest the following edit:

Non-elderly person with disabilities (for purposes of determining eligibility under HANO's preference): A person 18 years of age or older and less than 62 years of age, and who:

1. Has a disability, as defined in 42 U.S.C. § 423; or
2. Has a disability, as defined in 42 U.S.C. § 3602(h); or
3. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that: a. Is expected to be of long-continued and indefinite duration; b. Substantially impedes his or her ability to live independently, and c. Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or d. Has a developmental disability as defined in 42 U.S.C. 6001.

In addition, the definition of "People with Disabilities" cites the proper definition of "individual with handicaps" under fair housing implementing regulation 24 CFR 8.3. However, it goes on to state that the definition "does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes)." This statement also appears in the Eligibility Appendix. Under the Fair Housing Act past alcohol or substance use disorder may be considered a disability, especially if the tenant has undergone intervening treatment and are in recovery. We are concerned that carving out a certain subsection of people with disabilities for ineligibility may violate fair housing laws.

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

> **People with Disabilities: A person who has a disability as defined in 42 U.S.C. 423 or a developmental disability as defined in 42 U.S.C. 6001. Also includes a person who is determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long-continued and indefinite duration, substantially impedes the ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for people with disabilities, means and "individual with handicaps" as defined in 24 C.F.R. 8.3. Definition does not exclude people who have AIDS or conditions arising from AIDS, but does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes). See "Individual with handicaps."**

ACOP

1. We are thrilled that HANO is making its criminal background policy mandatory for third party companies that operate public housing, including "Signature Communities," that enter into contracts after October 1, 2022. Advocates have been calling for this since the policy was first implemented. We urge HANO to extend this requirement to renewal contracts with third party public housing owners/operators, including new management contracts. We further urge HANO to extend the requirement to new PBV contracts entered into after October 1, 2022, and PBV renewal contracts.

   HANO Response: We appreciate that you support HANO's decision to make its criminal background policy mandatory for third party companies that operate public housing for contracts signed after October 1, 2022. HANO is currently reviewing the number of PBV contractors that also have tax credits to determine if they are already following the LHC criminal background policy. In addition, we are consulting outside counsel regarding the scope of modifications for renewal contracts.

2. SLLS continues to have concerns about the level of deference afforded to third party owners and managers. Public housing tenants living in third party-managed sites should have the same protections as public housing tenants living in HANO owned sites. We continue to see notices of adverse action issued by third party management companies that are noncompliant with federal law and HANO policy. We continue to encounter third party management staff who are unfamiliar with their obligations, and/or have legally erroneous interpretations of their obligations, under public housing regulations. Many tenants don't know where to turn for support, including legal assistance, if they think their rights have been violated. In order to protect tenants at third party-managed sites, language should be added to the ACOP requiring third party managers to provide (a) contact information for SLLS, and (b) contact information for the property's HANO Asset Manager, on all notices of adverse action. In addition, third party operators should be required to submit their form notices of adverse action to HANO each year to ensure compliance with the ACOP and HUD regulations.

   HANO Response: Please note that mandates to third party managers that are outside of their contractual agreement with HANO are only allowed if HUD issues a mandate. HANO is currently reviewing notices at Guste Homes to ensure compliance and plan to complete random reviews of other third party managers to ensure compliance with ACOP and HUD regulations.

PHA Annual Plan

1. **Deconcentration policy:** SLLS still has concerns about HANO's policy to establish a preference for admission of working families where the average income of a public housing community falls below the Established Income Range (EIR). We are concerned that this preference requires further research because it may discriminate against families with disabilities who are unable to work for disability-related reasons in violation of fair housing law and the ADA. As written, the policy lacks the "two way street" set out by federal

regulations: not just raising incomes at the below average income developments, but also promoting in-migration of lower income persons at the higher than average income developments. "Deconcentration of poverty and income mixing is promoted by a policy that provides for bringing higher income tenants into lower income developments and lower income tenants into higher income developments." 42 CFR 903.2(a). The policy should be edited to address these concerns.

HANO Response: Regarding HANO's working preference as it relates to families with disabilities, HANO states in its Admissions and Continued Occupancy Policy (ACOP) that elderly and disabled families automatically receive the working preference to ensure no bias or discrimination occurs against families with disabilities who are unable to work. In addition, HANO's Deconcentration policy outlines the "two way street" as it begins with a statement in adherence to 42 CFR 903.2(a) by stating "HANO's admission policy is designed to provide for deconcentration of poverty and income mixing by bringing higher income residents into lower income developments and lower income residents into higher income developments." We are willing to review any proposed language that you may have that provides more clarity.

I would like to take this opportunity to thank you for your comments, your advocacy and our continued partnership. If you have any questions, feel free to contact Ms. Jessica Knox at jknox@hano.org.

Sincerely,

Yvette Hester
Executive Director

B.7 CERTIFICATION BY STATE OR LOCAL OFFICIALS

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

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

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

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

I, **Marjorianna Willman**, **the Director of Housing & Community Development**
Official's Name *Official's Title*
certify that the 5-Year PHA Plan for fiscal years N/A and/or Annual PHA Plan for fiscal year beginning **October 1, 2022** of the **Housing Authority of New Orleans** is consistent with the
PHA Name
Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of New Orleans
Local Jurisdiction Name

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

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

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

Name of Authorized Official:	Title:
Marjorianna Willman	**Director of Housing & Community Development**
Signature: Marjorianna Willman	Date: 5/18/2022

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

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

B.8	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☒ ☐ (b) If yes, please describe: **N/A**

C.	**Statement of Capital Improvements**. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
C.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. **Optional 5-Year Action Plan** ***See HUD Form 50075.2 approved by HUD on July 7, 2021.***

D. Admissions and Continued Occupancy Policy

(Excerpted from the Admissions and Continued Occupancy Policy, page 23)

Chapter 2

ELIGIBILITY FOR ADMISSION

Other Criminal Records

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

For applicants not barred by federal law, the applicant's criminal conviction(s) will be assessed to determine the risk the applicant poses to the safety and well-being of the community using valid written criteria, applicable laws including fair housing laws, applicable regulations, and sound management practices. All third parties contracted after October 1, 2022 who are managing public housing units must adhere to this policy.

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

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

E. Housing Choice Voucher Administrative Plan

(Excerpt of Revised Admin Plan)

No Revisions to the HCVP Administrative Plan are anticipated for fiscal year beginning October 1, 2022