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# ANNUAL PHA PLAN

Fiscal Year Beginning 10/1/2024  
Request to Amend

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



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

<b>A.</b>	<b>PHA Information.</b>
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A.1	<p><b>PHA Name:</b> <u>HOUSING AUTHORITY OF NEW ORLEANS</u>      <b>PHA Code:</b> <u>LA001</u></p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA      <input type="checkbox"/> Troubled PHA</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>10/1/2023</u></p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>*Number of Public Housing (PH) Units</b> <u>2,208</u>    <b>Number of Housing Choice Vouchers (HCVs)</b> <u>18,310</u></p> <p><b>Total Combined Units/Vouchers</b> <u>20,488</u></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><b>HANO's draft plans and policy revisions are posted on the following platforms</b></p> <ul style="list-style-type: none"> <li>• Agency's website at <a href="http://www.hano.org">www.hano.org</a></li> <li>• HANO Facebook page at <a href="https://www.facebook.com/HANOHOUSING">https://www.facebook.com/HANOHOUSING</a> HANO</li> <li>• Facebook page at <a href="https://www.twitter.com/HANOHOUSING">https://www.twitter.com/HANOHOUSING</a></li> <li>• HANO Constant Contact Email Group of Stakeholders</li> <li>• HANO Central Offices: 4100 Touro St. &amp; 2051 Senate St., New Orleans, LA 70122</li> <li>• <b>Housing Communities:</b> <ul style="list-style-type: none"> <li>○ Bienville Basin – 215 Treme St. &amp; 1201 Bienville St., New Orleans, LA 70112</li> <li>○ City Square – 1501 Saint Louis 70112</li> <li>○ Columbia Parc – 1400 Milton St. &amp; 1401 Caton St., New Orleans, LA 70122</li> <li>○ Faubourg Lafitte – 2200 Lafitte St. &amp; 700 N. Galvez St., New Orleans, LA 70119</li> <li>○ Fischer – 1915 L. B. Landry St., New Orleans, LA 70114</li> <li>○ New Florida – 2521 Independence St., New Orleans, LA 70117</li> <li>○ Guste – 1301 Simon Bolivar Ave., New Orleans, LA 70113</li> <li>○ Harmony Oaks – 3320 Clara St., New Orleans, LA 70115</li> <li>○ Marrero Commons – 3353 Martin Luther King Jr. Blvd., New Orleans, LA 70125</li> <li>○ River Garden – 913 Felicity St. &amp; 530 St. Andrew St., Ste. D, New Orleans, LA 70130</li> <li>○ The Estates – 3450 Desire Pkwy., New Orleans, LA 70126</li> </ul> </li> </ul> <p><b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p>
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Participating PHAs	PHA Code	Program(s) in the Consortia
Lead PHA:		

<b>B.</b>	
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**B.1 Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

- | Y                                   | N                                   |  |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Statement of Housing Needs and Strategy for Addressing Housing Needs                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Financial Resources.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Rent Determination.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Operation and Management.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Grievance Procedures.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Homeownership Programs.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Community Service and Self-Sufficiency Programs.                                       |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Safety and Crime Prevention.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pet Policy.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Asset Management.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Substantial Deviation.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Significant Amendment/Modification   |

**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 10/1/2024 PHA ANNUAL PLAN**

**HUD 2022 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS)  
USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2016-2020 CHAS DATASETS**

<b>Total Orleans Parish Households</b>	<b>154,825</b>	Population slightly increased from 153,820 to 154,825.
<b>Owner Households</b>	<b>77,065 (50% of Total)</b>	The number of homeowners increased from 74,240 to 77,065.
<b>Renter Households</b>	<b>77,760 (50% of Total)</b>	The number of renters decreased from 79,580 to 77,760.
<b>Orleans Parish Renter Households by Average Median Income (AMI) With Breakout of "Low Income Renter" Households</b>		
		<b>Statistical Notations</b>
<b>Extremely Low-Income</b> renter households (<=30% AMI)	26,590	Extreme Low-income population decreased from 28,750 to 26,590. Very Low-Income population increased from 13,695 to 14,385. The Low-Income population decreased from 12,110 to 11,635. Of the total 77,760 Renter Households in Orleans Parish, 52,610 or 67.7% are classified as Low-Income Renter Households. A nominal change occurred in the population with incomes greater than 80% AMI.
<b>Very Low-Income</b> renter households (>30% but <=50% AMI)	14,385	
<b>Low-Income</b> renter households (>50% but <=80% AMI)	<u>11,635</u>	
<b>Subtotal Low-Income Renter Households (&lt;=80% AMI)</b>	<b>52,610</b>	
Other renter households (>80% but <=100% AMI)	5,805	
Other renter households (>100% AMI)	<u>19,345</u>	
<b>Subtotal Other Renter Households (&gt;80% AMI)</b>	<b>25,150</b>	
<b>Total Renter Households:</b>	<b>77,760</b>	
Low-income renter households who are <b>cost burden</b>	<b>37,795</b>	Of all 52,610 Low-Income Renter Households, 37,795 or 72% are Cost Burdened. The same percentage as last year.
Low-income renter households with <b>housing problems</b>	<b>38,590</b>	Of all 52,610 Low-Income Renter Households 38,590 or 73% have Housing Problems. The same percentage as last year.
<b>COST BURDEN:</b> Moderate cost burden is "rent comprising more than 30 percent of income". Severe cost burden is "rent comprising more than 50 percent of income".		
<b>HOUSING PROBLEMS:</b> A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS data: 1) housing units lacks complete kitchen facilities; 2) housing units lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.		

## Section 8 Tenant- Based Assistance Waiting Lists

Housing Needs of Families on the Housing Choice Voice Waiting List		
<b>Waiting list type:     Section 8 tenant-based assistance (2022 Waiting List)</b>		
	# of families	% of total families
Waiting list total***	6289	100%
Extremely low income <=30% AMI	4839	76.94%
Very low income (>30% but <=50% AMI)	1034	16.44%
Low income (>50% but <80% AMI)	274	4.36%
Over income (>80% AMI)	142	2.26%
Families with children	2784	44.27%
Elderly families	178	2.83%
Families with Disabilities**	997	15.85%
Race/ethnicity – African American	5825	92.62%
Race/ethnicity – White	263	4.18%
Race/ethnicity – American Indian	14	0.22%
Race/ethnicity –Hispanic	172	2.73%
Race/ethnicity – Asian	3	0.00%
Race/ethnicity – Native Hawaiian/Other Pacific Islander	4	0.00%
Race/ethnicity – None Listed	50	0.79%
Characteristics by Bedroom Size*		
No BR Selected	60	0.95%
1BR	3220	51.20%
2 BR	1821	28.95%
3 BR	884	14.06%
4 BR	250	3.98%
5 BR	44	0.70%
5+ BR	10	0.16%
*Bedroom size is the size that is requested by the applicant but has not been determined by HANO/HUD occupancy standards.		
**The disability count was based on applicants' self-reporting of disability status.		

## Public Housing Waiting Lists

Housing Needs of Families on the Public Housing Waiting List		
	# of families	% of total families
Waiting list total*	23495	
Extremely low income	16,916	72%
Very low income (>30% but <=50% AMI)	7472	32%
Low income (>50% but <80% AMI)	2540	11%
Over income (>80% AMI)	2105	9%
Families with children	14142	60%
Elderly families	1577	7%
Families with Disabilities**	3095	13%
Race/ethnicity – African American	21455	91%
Race/ethnicity - White	1168	4%
Race/ethnicity – American Indian	85	1%
Race/ethnicity –Hispanic	562	2%
Race/ethnicity –Asian	27	0%
Race/ethnicity – Native Hawaiian / Other Pacific Islander	39	0%
Race/ethnicity – None Listed	159	1%
<b>Characteristics by Bedroom Size (Public Housing Only)</b>		
1BR	9399	40%
2 BR	7090	30%
3 BR	4454	19%
4 BR	2347	10%
5 BR	935	4%
5+ BR	473	2%
<p><i>*Some families may appear on multiple Public Housing site-based wait lists. The overall number of families on all Public Housing site-based wait lists is 23,495. 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.</i></p> <p><i>**The disability count may be underreported based on applicants' self-reporting of their disability status.</i></p>		

## Strategies for Addressing Disparities in Housing Needs

### Assessment of Fair Housing (AFH) Plan

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

To address these barriers, the AFH Plan proposes to:

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

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



# Statement of Financial Resources

Anticipate Financial Resources for FYB Oct. 1, 2024			
Planned Sources and Uses			
		Planned \$	Planned Uses
<b>1</b>	<b>Federal Grants</b>		
	Public Housing Operating Fund	\$10,068,805	
	Capital Fund Program	\$10,900,000	
	Replacement Housing Factor Funding	\$0	
	Annual Contributions for Tenant-Based Assistance (HCV HAP)	\$192,530,573	
	Annual Contributions for Tenant Based Vouchers all Administrative Fees	\$14,055,060	
	FEMA	\$2,500,000	
<b>2</b>	<b>Prior Year Federal Grants (unobligated funds only)</b>		
	Capital Funds (CFP & RHF)	\$17,807,108	
	CNI	\$0	
	Hope VI	\$0	
	901 funds	\$0	
<b>3</b>	<b>Public Housing Dwelling Rental Income</b>		
	Tenant Rental Revenue	\$655,440	
<b>4</b>	<b>Other Income (list below)</b>		
	Interest Income	\$30,000	
	State and Local	\$0	
	Misc. Income	\$977,795	
	<b>Total sources</b>	<b>\$249,524,781</b>	

## **Operation and Management**

Following is a summary of policy changes proposed to facilitate the operation and management of HANO's programs. There are no policy changes for HANO's Public Housing (PH) Admissions and Continued Occupancy Policy (ACOP). HANO's Housing Choice Voucher Program (HCV) Administrative Plan has changes summarized below. HANO is also apply for a Section 18 disposition which is explained below. Policy documents are available on the Agency's website at [www.hano.org](http://www.hano.org).

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

HANO has revised the HCV Administrative Plan as follows:

1. Allowed youth 6 years of age to of opposite genders to obtain their own rooms to determine unit sizes
2. Clarified language regarding exceptions to competitive selection of PBV units

The Admin Plan with redline changes has been appended to this document.

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

HANO has no revisions to the Admissions and Continue Occupancy Plan (ACOP).

### **Section 18 Disposition**

The Estates at Desire includes four sites that were developed under the mixed finance public housing development program – Treasure Village (34 units), Abundance Square (73 units), New Savoy Place Apartments (aka Savoy I)(158 units), and New Savoy Place Phase II (aka Savoy II) (160 units)(together the “Developments”). The Developments include four hundred and twenty five (425) residential units of which one hundred and twenty seven (127) are public housing units. The Owners have defaulted on their ground leases with HANO, the Agreements not to Alienate in favor of HUD, and have failed to comply with public housing requirements because the Owners' general partners, along with their related management company, will abandon the Developments effective December 31, 2024, which would leave the Developments unattended and unmanaged. In the case of Savoy I, the Owner has defaulted on its sublease with the Industrial Development Board of the City of New Orleans, Inc. (“IDB”) by failing to pay a payment in lieu of taxes that was due in June of 2024.

As part of the dispositions, the Estates at Desire will be removed from the public housing program so that HANO can substitute the current public housing operating subsidies with Project Based Vouchers to address escalating operating costs and deferred maintenance needs for the Developments.

HANO aims to preserve long-term affordability and will be including a HANO Use agreement that requires renewal of the PBV HAP contract that will run coterminous with the 99-year ground lease. HANO also plans to continue mandatory lease provisions the right to a 30-day notice with the right to cure nonpayment of rent along with grievance and tenant participation rights. Participation in the PBV program will continue to give tenants the right to pay only 30% of their household income towards rent.

## **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>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 10%; text-align: center;">Y</td> <td style="width: 10%; text-align: center;">N</td> <td></td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Hope VI or Choice Neighborhoods.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Mixed Finance Modernization or Development.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Demolition and/or Disposition.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Designated Housing for Elderly and/or Disabled Families.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Conversion of Public Housing to Tenant-Based Assistance.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Conversion of Public Housing to Project-Based Assistance under RAD.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Occupancy by Over-Income Families.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Occupancy by Police Officers (<i>Demonstration Program at Guste Homes only</i>).</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Non-Smoking Policies.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Project-Based Vouchers.</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Units with Approved Vacancies for Modernization.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</td> </tr> </table> <p>(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.</p>	Y	N		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hope VI or Choice Neighborhoods.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mixed Finance Modernization or Development.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Demolition and/or Disposition.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Designated Housing for Elderly and/or Disabled Families.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Conversion of Public Housing to Tenant-Based Assistance.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Conversion of Public Housing to Project-Based Assistance under RAD.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Occupancy by Over-Income Families.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Occupancy by Police Officers ( <i>Demonstration Program at Guste Homes only</i> ).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Non-Smoking Policies.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Project-Based Vouchers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Units with Approved Vacancies for Modernization.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
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## **Hope VI or Choice Neighborhoods**

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

## **Mixed Finance Modernization or Development**

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

If yes, list developments or activities below:

*Iberville Choice Neighborhoods Initiative – City Square Phase 2*

## **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?

The Estates at Desire includes four sites that were developed under the mixed finance public housing development program – Treasure Village (34 units), Abundance Square (73 units), New Savoy Place Apartments (aka Savoy I)(158 units), and New Savoy Place Phase II (aka Savoy II) (160 units)(together the “Developments”). The Developments include four hundred and twenty five (425) residential units of which one hundred and twenty seven (127) are public housing units. The Owners have defaulted on their ground leases with HANO, the Agreements not to Alienate in favor of HUD, and have failed to comply with public housing requirements because the Owners’ general partners, along with their related management company, will abandon the Developments effective December 31, 2024, which would leave the Developments unattended and unmanaged. In the case of Savoy I, the Owner has defaulted on its sublease with the Industrial Development Board of the City of New Orleans, Inc. (“IDB”) by failing to pay a payment in lieu of taxes that was due in June of 2024.

In a work-out arrangement with HANO similar to a deed-in-lieu of foreclosure, the Owners will dispose of the Developments by assigning their interests in the ground leases from HANO as well as, where applicable, their interests under subleases with the IDB to wholly-controlled HANO entities (“HANO Entities”). In the case of Treasure Village and Abundance Square, HANO has created Abundance Treasure Housing, Inc., which is a wholly controlled public facilities corporation, to own those properties. Property owned by Abundance Treasure Housing, Inc. will be exempt from real property taxes.

In the case of Savoy I and Savoy II, HANO has created limited liability corporations – Savoy I Authority LLC and Savoy II Authority LLC – to own those properties to preserve the existing mortgages, ground leases, and subleases so that the property tax exemptions granted through the IDB will remain intact. JP Morgan Chase Bank N.A. (“Chase”) owns bonds issued by the IDB for Savoy I. Savoy II is burdened by a mortgage in favor of Wells Fargo Bank N.A. (“Wells”) and one in favor of the Louisiana Housing Corporation (“LHC”). HANO is working with Chase and Wells to either assume or discharge their secured obligations. LHC cannot discharge the debt associated with its mortgage. If the debt to Chase is discharged, Abundance Treasure Housing, Inc. may assume the ground lease and the sublease from the IDB might be terminated. If the debt to Wells is discharged, a different public facilities corporation created by HANO, Savoy II Estates Housing, Inc., might assume the ground lease, the IDB sublease might

be terminated and the LHC mortgage will remain.

As part of the dispositions, the Estates at Desire will be removed from the public housing program so that HANO can substitute the current public housing operating subsidies with Project Based Vouchers to address escalating operating costs and deferred maintenance needs for the Developments.

HANO has determined the dispositions to be appropriate pursuant to 24 CFR 970.17 (a) because the Owners' abandonment of the Developments will adversely affect the health and safety of the residents and make the operation of the Developments infeasible unless new owners step in to own, manage, and maintain them.

With respect to Fair Market Value, the Owners are disposing of the Estates at Desire to the HANO Entities as a remedy for the Owners' default on their ground leases with HANO and the Agreements not to Alienate in favor of HUD. HANO is not providing any compensation to the Owners. The dispositions are occurring for less than fair market value because it is in HANO's, HUD's, and the residents' best interest to preserve HANO and HUD's Twenty Nine Million Eighty-Nine Thousand Seven Hundred and Fifty Three Dollar (\$29,089,753) investment in the Developments, to protect the health and safety of the residents of the Developments, and to prevent the displacement of the residents. HANO will file Section 18 Use Agreements against the Developments requiring that the former public housing units are maintained as affordable housing.

Demolition/Disposition Activity Description Bywater/Marigny					
Activity type: Demolition		Disposition		(Scattered Sites)	
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001025	4200 Royal; 2522 N Rampart	8/12/2014	0 - vacant lot	Part of development	FY2019-2025
	2818 Burgundy; 2819 Dauphine; 710 Clouet	3/11/2010			
LA001036	1740-42-44-46 Poland; 1830-32-34-36 Poland	3/11/2010	0 - vacant lot	Part of development	FY2019-2025
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	FY2019-2025
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	FY2019-2025

**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	FY2019-2025
LA001025	717 DeArmas	8/12/2014	0 - vacant lot	Part of development	FY2019-2025

**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	FY2019-2025

**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	FY2019-2025
	1324-26 Eagle; 1925 Monroe; 1433-39 Gen Ogden; 9031 Cohn; 8729 Plum	3/11/2010	0 - vacant lot	Part of development	FY2019-2025
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 2019-2025



Demolition/Disposition Activity Description Uptown					
Activity type: Demolition		Disposition <input checked="" type="checkbox"/> (Scattered Sites)			
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001019	400 Dufossat	3/11/2010	0 - vacant lot	Part of development	FY2019-2025
LA001025	2118-20-22 Danneel	8/12/2014	0 - vacant lot	Part of	FY2019-2025
	1000 Melpomene; 1008 Melpomene; 1016 Melpomene; 1231 Constance; 1120 Thalia	1/6/2011	0 - vacant lot	Part of development	FY2019-2025
	1421-23-25 Constance; 2331-33 Annunciation; 5312 Constance; 3249 Tchoupitoulas; 410 Pleasant	8/12/2014	0 - vacant lot	Part of development	FY2019-2025
	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	FY2019-2025
LA001027	2256 Baronne <input type="checkbox"/>	1/6/2011	0 - vacant lot	Part of development	FY2019-2025
LA001049	3644 Annunciation; 3664 Annunciation; 735 Amelia	2/6/2002	0 - vacant lot	Part of development	FY2019-2025
LA001051	2901-03-05-07 Dryades	1/6/2011	0 - vacant lot	Part of development	FY2019-2025
LA001052	220-22 Eleonore	3/11/2010	0 - vacant lot	Part of development	FY2019-2025

Demolition/Disposition Activity Description Upper Ninth/St. Roch/St. Claude					
Activity type: Demolition		Disposition <input type="checkbox"/> (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;	3/11/2010	0 - vacant lot	Part of Development	FY2022-2025
	1927-29 Mandeville	8/12/2014			
LA001051	3013-15 Mandeville	1/6/2011	0 - vacant lot	Part of development	FY2022-2025
LA001021	2123-25-27 Painters; 2129-31-33 Painters	8/12/2014	0 - vacant lot	Part of development	FY2022-2025

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

Demolition/Disposition Activity Description Desire					
Activity type: Demolition <input type="checkbox"/>		Disposition <input checked="" type="checkbox"/>			
LA # or AMP #	Development Name/Address	Application Status: Approved	Units Affected	Coverage of Action	Projected Timeline
LA001014	Desire	12/29/2000	0 - vacant lot	Part of development	FY2022-2026
LA001014713 LA001014716 LA001082703 LA001081702	Savoy I Savoy II Treasure Village Abundance Square	Pending approval	158 160 34 73	Total development	FY 2024-2025

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



**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?

HANO plans to apply for the following designation:

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	385 (100%)	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
<b>Total</b>			512	23	<b>551</b>	551
Total Units in HANO's Public Housing Inventory						<b>2,174</b>

**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.

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 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. 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 2,457 units under Housing Assistance Payments (HAP) contracts. In addition, HANO has issued 534 PBV commitments which will produce additional affordable units depending on the timing of the financial closing and construction schedule.

## PBV UNITS UNDER HAP

Development Name	Development Address	HAP Effective Date	Units Under HAP
1300 OCH (Oretha Castle Haley)	1300 Baronne St., 70113	11/16/2023	20
1508 Orleans, LLC	1508 Basin St., 70116	4/19/2018	33
1601 Orleans, LLC	1601 Basin St., 70116	4/19/2018	31
2 Oaks Apartments	14600 Dwyer Blvd., 70129	7/27/2018	64
3501 St. Claude/Redmellon	3501 St Claude Av., 70117	12/31/2010	12
4948 Chef Menteur Apts	4948 Chef Menteur Hwy, 70126	3/31/2022	42
Abundance Square	3451 Desire Pkwy, 70126	4/17/2014	27
Artspace Bell School	2100 Ursulines Av., 70119	3/23/2018	19
Blueberry Hill Homes	Scatted Sites (Lower Ninth Ward)	11/6/2018	41
Capdau Home for the Aged	3821 Franklin Av., 70122	11/12/2020	80
City Square 162	1501 St. Louis St., 70112	8/18/2021	15
CNI Redevelopment	1012-14 N. Broad St., 70119	3/8/2021	2
Filmore Parc I	5172 St. Anthony St., 70122	7/1/2012	71
Filmore Parc II	5172 St. Anthony St., 70122	8/1/2012	32
Flint Goodridge	2425 Louisiana Av., 70115	11/1/2017	87
Forrest Park	3708 Garden Oaks Dr., 70114	4/2/2009	71
G.O. Mondy School	2325 - 2327 St. Phillip St., 70119	6/29/2017	32
Guste I	1301 Simon Bolivar St., 70113	3/16/2018	15
Guste III, Stages I-VI	1301 Simon Bolivar St., 70113	9/30/2016	46
H3C, LLC	1385 Baronne St., 70113	11/16/2023	18
Heritage at Columbia Parc Elderly	1401 Caton St., 70122	5/13/2013	83
Holy Angels Partners	3500 St. Claude Av., 70117	10/1/2023	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
Iberville Phase 4	1559 Rue Iberville St., 70112	11/9/2017	51
Jackson Landing South 262	3400 Garden Oaks Dr., 70114	12/31/2010	14
Jacksons Landing North	3204 Memorial Park Dr., 70114	12/31/2010	35
King Rampart Apartments	1931 Martin Luther King Jr., Blvd 70113	11/26/2012	7
Treme Cottages	2200 Lafitte St., 70119	10/15/2013	4
Lafitte Onsite I/Blocks 1-3	2200 Lafitte St., 70119	5/19/2011	60
Lafitte Onsite II/Blocks 5-7	2200 Lafitte St., 70119	11/7/2012	35
Lafitte Senior	700 N. Galvez St., 70119	3/8/2017	70
Lafitte VA Rehab/Treme Oak Pl	2200 Lafitte St., 70119	10/6/2012	38
Lake Forest Manor	10101 Lake Forest Blvd., 70127	9/28/2022	15
Lake Forest Manor	10101 Lake Forest Blvd., 70127	9/28/2022	185
Marais Property/1501 Master Tenant	1501 Canal St., 70112	5/21/2014	106
McCaleb Supportive Housing	2412 Clio St., 70113	10/17/2012	21
Alembic	5909 St. Claude Av., 70117	1/7/2022	16
Opportunity Homes-Redmellon	8518 Oak St., 70118	2/28/2011	4
Redemptorist Apts	950 Josephine St., 70130	10/10/2017	105
Reveal New Orleans	13733 Chef Menteur Hwy, 70128	3/31/2022	150

River Garden Elderly Apts	2017 Laurel St., 70130	4/21/2009	56
Roman Bienville--Iberville	1830 Bienville St., 70112	5/14/2015	9
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
Rosa F. Keller Bldg	2222 Tulane Av., 70119	7/6/2012	15
Sacred Heart at St Bernard	1720 St. Bernard Av., 70116	9/21/2018	13
Savoy Place I	3451 Desire Pkwy, 70126	2/1/2019	113
Savoy Place II	3451 Desire Pkwy, 70126	3/30/2011	89
SBP Lower 9	Scattered Sites, 70117	9/23/2021	15
SBP St. Peter	2645 Toulouse St., 70119	4/30/2020	16
Skyview Townhomes	Scattered Sites 70126	12/31/2010	14
St. Ann Square 2017	2123 Ursulines Av., 70119	8/14/2020	59
The Crescent Club	3000 Tulane Av., 70119	2/4/2011	30
The Preserve New Orleans I LLC	4301 Tulane Av., 70179	2/4/2011	27
Treasure Village	3451 Desire Pkwy, 70126	7/1/2014	26
Tudor Square Elderly	3011 Milan St., 70115	6/1/2012	41
Walnut Square	8501 I-10 Service Rd., 70127	7/13/2009	48
Wisdom Manor	8900 Quince St., 70118	2/4/2012	20
			<b>2457</b>

**Units Approved for Vacancy for Modernization**

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



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

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

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

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

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

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

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

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

- Objective 3.1 Reduce transaction times for clients, landlords, and other business partners.
- Objective 3.2 Establish a call center along with defined response times and tracking protocols
- Objective 3.3 Distribute quarterly customer satisfaction surveys to obtain feedback from internal and external 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 OBJECTIVES		PROGRESS TOWARDS GOALS
<b>Objective 1.1</b>	<b>Plan for redevelopment of scattered sites and other vacant parcels utilizing a neighborhood-centric approach</b>	<p>Redevelopment of the 136 units in the Bywater area was reduced to 82 with the reduction of the market rate units. The developer will submit a 4% LIHTC application to the Louisiana Housing Corporation for CDBG Prime 3 in spring 2024.</p> <p>Development of six scattered sites in the West Carrollton and Uptown neighborhoods. Four of the six sites have received Section 106 approval.</p>
<b>Objective 1.2</b>	<b>Seek publicly-owned vacant lots within close proximity to develop live, work, and play amenities.</b>	<p>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.</p>
<b>Objective 1.3</b>	<b>Explore opportunities for self-development by HANO.</b>	<p>In the current economic climate, HANO continues to explore self-development opportunities for either rental or homeownership. Staff is working on a Scattered Site Development Strategy, which is expected to be completed by summer 2023.</p>
<b>Objective 1.4</b>	<b>Leverage resources to build new housing and modernize existing housing.</b>	<ul style="list-style-type: none"> <li>• HANO has leveraged its project-based vouchers (PBV) to develop new housing. As part of the CNI redevelopment, 469 PBV units have been constructed in Tremé. An additional 23 PBV units are planned for Winn-Dixie Phase II and another 40 PBV units at Faubourg Lafitte, both of which are within the CNI boundaries.</li> <li>• In the Bywater and Carrollton neighborhoods, 34 and 77 PBV vouchers are planned for new construction, respectively.</li> </ul>
<b>Objective 1.5</b>	<b>Implement sustainability measures to preserve and protect HANO’s portfolio</b>	<p>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.</p>

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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 2.1</b>	<b>Facilitate development of 1,000+ affordable housing units during the plan period.</b>	HANO is on target to develop 1,000 affordable housing units between 2021 and 2025. HANO expects to develop 236 units by 2025, including 45 rental units for Winn-Dixie Phase 2, 110 rental units in the Carrollton neighborhood, and 51 rental units at Faubourg Lafitte. HANO expects to create affordable homeownership opportunities through self-development and/or development with third-party partners.
<b>Objective 2.2</b>	<b>Continue growing the Project Based Voucher program as an incentivizing tool for new housing development</b>	HANO is steadily increasing the use of project based vouchers and has 13 "Agreements to enter into a HAP contract" (AHAP) that are expected to convert to HAP contracts in the next fiscal year. HANO has roughly 400 PBV commitments for upcoming developments. The agency plans to release a Request for Proposal for additional PBV projects in 2024.
<b>Objective 2.3</b>	<b>Increase the usage of homeownership vouchers to 5% of HCV households</b>	HANO has provided 547 homeownership vouchers which is 3% of HANO's 18,280 HCV allocated vouchers, an increase from the last fiscal year. HANO is working to increase usage to 5%.
<b>Objective 2.4</b>	<b>Recruit partners to provide down-payment assistance for homeowners and security deposit assistance for renters</b>	HANO has partnered with the City of New Orleans to provide down payment and closing costs subsidies to HANO assisted first- time homebuyers.
<b>Objective 2.5</b>	<b>Utilize Federal low-income housing tax credits and other financing tools to support affordable housing development</b>	HANO's third-party development partners have secured low- income housing tax credits (LIHTC) for the development of affordable housing. A total of 76 new units were completed at City Square 162. Another 45 units will be developed under Winn-Dixie Phase 2, which received an allocation of 9% tax 2023 credits. A total of 22 units will be developed as part of 2256 Baronne Street, using 4% tax credits. .
<b>Objective 2.6</b>	<b>Utilize community land trusts to ensure long-term affordable homes</b>	HANO is considering the development of affordable housing in partnership with third party developers as well as organizations such as Crescent City Community land trust.

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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 3.1</b>	<b>Reduce transaction times for clients, landlords, and other business partners</b>	HANO has deployed a cutting-edge website that facilitates intuitive and efficient navigation. Electronic forms have been widely adopted, minimizing the need for manual paperwork and accelerating data entry. Furthermore, a significant investment has been made in the implementation of an Electronic Document Management System, enhancing document organization, retrieval, and sharing capabilities.
<b>Objective 3.2</b>	<b>Establish a call center along with defined response times and tracking protocols</b>	HANO established a call center in March 2021 that is fully operational with staff who are trained to answer questions and track responses.
<b>Objective 3.3</b>	<b>Distribute quarterly customer satisfaction surveys to obtain feedback from internal and external customers</b>	HANO completed tenant surveys in 2020 as part of the ROSS grant application.
<b>Objective 3.4</b>	<b>Provide ongoing staff training in customer relations and interpersonal skill building</b>	All call center staff were trained on customer relations, fair housing, and HCV program details such as the Administrative Plan and Emphasys software.

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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 4.1</b>	<b>Improve the Agency’s performance under the Public Housing Assessment System (PHAS)</b>	HANO latest composite score of 70 was in 2022 which places the agency as an a Substandard Performer in the Public Housing Program. HANO anticipates that the score for 2024 will increase significantly.
<b>Objective 4.2</b>	<b>Retool HANO’s asset management protocol to drive continuous improvement in all areas of property management</b>	HANO is in the process of retooling its asset management protocol to ensure that property managers focus on the day-to-day operations of rental properties while asset managers focus on the financial integrity and administrative viability of not only developments managed by HANO but those managed by third parties as well.
<b>Objective 4.3</b>	<b>Maintain high performer status under the Section 8 Management Assessment Program (SEMAP)</b>	HANO is currently a high performer under HUD’s SEMAP assessment system. Under the latest assessment for FY 2019, HANO still has room for improvement in the Family Self-Sufficiency (FSS) category & QC inspections. The agency has hired a full time FSS Housing Specialist and has contracted with a third party to perform inspections. HANO will be a high performer for FY 2022 utilizing a HUD COVID waiver to carry forward its most recent SEMAP assessment. The HCVP Department is monitoring its SEMAP performance monthly to stay on track with this goal.
<b>Objective 4.4</b>	<b>Ensure ongoing compliance monitoring and tracking of SEMAP and other HCV performance metrics</b>	Files are audited monthly for compliance monitoring and tracking of SEMAP indicators as well as other HCV metrics.
<b>Objective 4.5</b>	<b>Apply to become an MTW agency after achieving high performer status</b>	HANO plans to apply to Cohort 5 of the MTW program when it is announced.

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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 5.1</b>	<b>Develop a rebranding strategy to strengthen HANO's image and foster positive perceptions of the Agency.</b>	HANO has developed a strategy to rebrand the agency which is updated periodically with additional tasks as new programs and projects are launched. Multiple tasks have been implemented, with others to follow this year. The marketing agency Prismatic has been selected as the vendor tasked with facilitating the rebranding effort.
<b>Objective 5.2</b>	<b>Create a new visual identity using social media and other platforms (website, Facebook, Instagram)</b>	HANO is currently utilizing Facebook, Twitter, and Instagram as social media platforms to provide updates, notices, features and activity information. A new website is currently being redeveloped by the Velocity Agency.
<b>Objective 5.3</b>	<b>Enlist ambassadors and partnerships to help HANO achieve an active and engaging community presence.</b>	HANO staff were enlisted as Ambassadors in 2020. Ambassadors worked together with the Communications department to develop core values for the Agency and a plan to increase HANO's presence at community meetings in the Second quarter of 2021. As a result, HANO has partnered with the Mayor's Office of Neighborhood Engagement to distribute HANO materials during neighborhood events and activities throughout the city.
<b>Objective 5.4</b>	<b>Create and maintain a media kit to facilitate communication with press outlets</b>	HANO developed a digital agency fact sheet as well as posted information on HANO's Board of Commissioners, our Executive Director and Executive Staff all on our external website, which is all accessible to media. HANO is in the process of creating a general informational video on the successes of HANO and its residents to facilitate communication with press outlets. Anticipate the video being completed and uploaded later this summer.
<b>Objective 5.5</b>	<b>Share information about HANO initiatives through expanded participation in community and industry associations, at local and national levels</b>	<ul style="list-style-type: none"> <li>• Initiatives were shared during the City's Community Clean Up event and during community meetings hosted by the Mayor's Office of Neighborhood Engagement.</li> <li>• Materials are also shared at the New Orleans Public Libraries during the City's Community Office Hours</li> <li>• HANO's Police Department has also shared information on HANO's initiatives through its participation in the City's Neighborhood Leaders' Roundtable discussion on public safety.</li> </ul>

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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 6.1</b>	<b>Upgrade to an integrated computer system that will encompass both programmatic and financial functionality</b>	HANO is launching a new financial system that will encompass both programmatic and financial functionality with implementation planned for spring 2023.
<b>Objective 6.2</b>	<b>Organize a new call center along with standard operating procedures, response times, and tracking protocols</b>	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.
<b>Objective 6.3</b>	<b>Evaluate and update work processes to improve efficiency and reduce time to complete client and landlord transactions</b>	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.
<b>Objective 6.4</b>	<b>Foster continuous performance improvement (CPI) by providing training and professional development opportunities to all staff</b>	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.**

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 7.1</b>	<b>Participate in Asset Repositioning training conducted by HUD and other industry organizations.</b>	Staff will participate in Asset Repositioning Training and plans to continue this type of training in 2024-2025.
<b>Objective 7.2</b>	<b>Develop criteria for identifying and prioritizing underperforming properties and for determining appropriate repositioning strategies</b>	HANO has identified properties that it has self-developed as well as those constructed in partnership with third-party developers and we are currently working on a performance improvement strategy to for these sites.

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

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

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

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

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



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

<b>HOUSING AUTHORITY OF NEW ORLEANS OBJECTIVES</b>		<b>PROGRESS TOWARDS GOALS</b>
<b>Objective 10.1</b>	<b>Research and implement cost savings related to central office space needs and relocation possibilities.</b>	HANO's Asset Management department completed an evaluation of central office space. From this evaluation, HCV office spaces were reconfigured and call center staff were relocated to a central call center location.
<b>Objective 10.2</b>	<b>Develop a team of policy/grant writers to seek grants to support all functions of HANO</b>	HANO has sought more grants utilizing a team approach in the last fiscal year than in the previous five years. HANO has applied and received the FSS grant, ROSS grant, the CNI supplemental grant, the Choice Demonstration Grant, the Primetime Reading grant, and a Choice Neighborhood Planning grant.
<b>Objective 10.3</b>	<b>Continue partnerships with third parties to fund development projects and other Agency initiatives.</b>	HANO partnered with the City of New Orleans, the Louisiana Housing Corporation and the City Planning Commission to host a Developer Symposium to educate developers on each agency's affordable housing programs and processes. HANO is using the information discussed at the symposium to create its Vacant Lot Scattered Site Strategy. In addition, HANO intends to host more informational and listening sessions with developers as well as other City and State agencies to implement industry best practices for future affordable projects.
<b>Objective 10.4</b>	<b>Study best practices and implement measures that will further HANO's financial sustainability.</b>	HANO is studying best practices as a part of developing asset repositioning strategies.



<b>B.4</b>	<b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. <b><u>Optional 5-Year Action Plan</u></b> <i>See HUD Form 50075.2 approved by HUD on October 4, 2023.</i>

<b>B.5</b>	<b>Most Recent Fiscal Year Audit.</b>
	<p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>The HANO audit for FY 2023 was completed in March 31, 2024 and there was one finding. HANO was granted an extension for a late submission to the State of Louisiana of our audit results. Despite receiving approval, the State requires a finding that the submission was late.</p>



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

### **C.1 Resident Advisory Board (RAB) Comments** **Plan Consultation Meeting – November 20, 2024**

Date	RAB Comments	HANO Response
	Comments regarding amendment items captured below. A letter was also submitted.	
11-20-24	The Estates has a number of problems with units. There should be regular meetings now to identify issues and develop a plan to address.	The Director of Asset Management will be inspecting every unit at the Estates during November and December. A plan will be developed to cure problems and monthly meetings will begin after HANO assumes management of the community.
11-20-24	The Citywide Resident Association has drafted a letter in support of HANO maintaining management of the Estates until all issues are addressed. The letter rejects privatization of management at the Estates.	HANO appreciates the support of the Citywide Tenant’s Association in our efforts to assume management of the Estates and address modernization and financial needs.
11-20-24	Mildew is an issue at the Estates. HANO should look at plumbing in interior walls.	The Director of Asset Management will be inspecting every unit at the Estates during November and December. A plan will be developed to cure problems and monthly meetings will begin after HANO assumes management of the community.

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

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

<b>Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)</b>	<b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing OMB No. 2577-0226 <b>Expires 3/31/2024</b>
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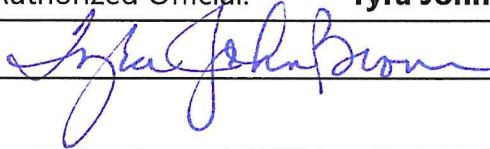
**Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan**

I, Tyra Johnson Brown, the Director of Housing Polic certify that the 5-Year PHA Plan for fiscal years 2024-2028 and/or Annual PHA Plan for fiscal year 2024 of the LA001 - Housing Authority of New Orleans is consistent with the 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 New Orleans pursuant to 24 CFR Part 91 and 24 CFR § 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: <b>Tyra Johnson Brown</b>	Title: <b>Director of Housing Polic</b>
Signature: 	Date: <u>11/20/2024</u>

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.

**Form identification:** LA001-Housing Authority of New Orleans form HUD-50077-SL (Form ID - 2276) printed by Jessica Knox in HUD Secure Systems/Public Housing Portal at 11/20/2024 12:21PM EST

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

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

<b>Certification of Compliance with PHA Plan and Related Regulations</b> <i>(Standard, Troubled, HCV-Only, and High Performer PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing <b>OMB No. 2577-0226</b> <b>Expires 3/31/2024</b>
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### **PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the    5-Year and/or    Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 10/2024, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair



housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.

16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.

- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

**Housing Authority of New Orleans**

**LA001**

PHA Name

PHA Number/HA Code

X Annual PHA Plan for Fiscal Year **2024**

   5-Year PHA Plan for Fiscal Years 20   - 20  

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

Name of Executive Director <b>MS Keva Landrum</b>		Name Board Chairman <b>Percy Manson</b>	
Signature	Date	Signature	Date

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 compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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.

**Form identification:** LA001-Housing Authority of New Orleans form HUD-50077-ST-HCV-HP (Form ID - 675) for CY 2024 printed by Jessica Knox in HUD Secure Systems/Public Housing Portal at 11/20/2024 12:18PM EST



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

## Public Hearing Comments

Audio will be linked here after Public Hearing on December 27, 2024



## Stakeholder Comments



# LOUISIANA FAIR HOUSING ACTION CENTER

## BOARD OF DIRECTORS

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EXECUTIVE  
DIRECTOR  
AMECA REALI

December 20, 2024

Housing Authority of New Orleans  
Executive Department  
4100 Touro Street New Orleans, LA 70122

By Electronic Mail

### **Re: Housing Authority of New Orleans PHA Annual Plan for FY2024**

Please accept the following comments on behalf of the Louisiana Fair Housing Action Center (LaFHAC) on the PHA Annual Plan for FY2024, Admissions and Continued Occupancy Policy, and the Housing Choice Voucher Administrative Plan. LaFHAC is a 19 year-old Civil Rights nonprofit located in New Orleans who serves the entire state of Louisiana. We are dedicated to enforcing the Fair Housing Act and ending both housing segregation and discrimination.

In August, the Louisiana Fair Housing Action Center (LaFHAC) published [\*The Mobility Myth: Housing Choice Voucher Discrimination in Orleans Parish\*](#). This investigation documents the extreme odds voucher holders face to locate housing providers in neighborhoods of their choice that will also accept a housing choice voucher as payment. Most strikingly, *only one out of three* landlords in our study expressed interest in renting to a family with a housing choice voucher.

While the refusal to accept a housing choice voucher is not necessarily illegal, discrimination against housing choice voucher recipients can easily serve as a proxy for other illegal forms of discrimination based on race, family status, and disability. Our report shows that people with housing choice vouchers are



regularly denied housing based on secondary factors such as their source of income. With almost 16,000 tenant-based vouchers in use across New Orleans and Black families making up the majority of such voucher holders, these findings demonstrate the far-reaching impacts discrimination has on finding and securing housing in the neighborhood of one's choosing.

Though this investigation focused on whether private landlords were willing to accept housing choice vouchers from prospective renters, public housing authorities have a substantial role to play in combating voucher discrimination, creating more housing opportunities for families with vouchers, and decentralizing areas of voucher density and concentrated poverty.

In light of our recent work and history of housing advocacy, we provide the following comments in the spirit of equity and with an eye toward creating more inclusive communities.

### **Admissions & Continued Occupancy Policy**

1. The status of implementation of HANO's otherwise exemplary criminal background screening policy remains unclear. On pg. 90 of the 2022 Annual plan, in Appendix 1: Admissions and Continued Occupancy Policy, HANO notes a new addition in red, stating that "All third parties contracted after October 1, 2022 who are managing public housing units must adhere to this policy" (referring to HANO's criminal background screening policy). However, the change was not made in the 2022 ACOP. Further, the change has not been made in the 2023 ACOP draft. We recommend that HANO add this language to its 2023 ACOP and guarantee that any third-party contracted after October 1, 2022 to build or operate public housing will be using HANO's or LHC's criminal background screening policy.
2. The proposed ACOP includes a proposal to include rent payment habits in the Screening for Suitability (pg. 39-42). This proposal raises very serious concerns for us. There is no reason a tenant's rent payment habits in a previous unsubsidized home would have any bearing on their ability to pay rent when subsidized. In a city where 57% of renter households pay more than 30% of their income on rent, this policy could also disqualify the vast majority of applicants who need access to affordable housing.<sup>1</sup> We strongly recommend

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<sup>1</sup> American Community Survey, 2021 1-year estimates, Table B25070.

that HANO refrain from using such practices. However, in the event that rent payments are used in screening as stated in this section, we urge HANO to make some sort of distinction between rent payment habits when a tenant did not have the benefits of subsidy and when they did. Though we believe it should not be used to deny a tenant admission to a subsidized unit.

### **HCV Plan**

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

### **PHA Plan**

#### Expanding Utilization and Landlord Participation

1. We commend HANO on Objective 8.1 to provide an enhanced tenant portal for clients but want to note that individuals still face extensive wait times to receive a voucher even with a waitlist closed to new applicants. We strongly encourage HANO to evaluate and publish average wait times to help tenants make informed decisions. HANO should also update the waitlist statistics listed on pg. 6-7 of the PHA plan, as the current numbers are not representative of the number of individuals waiting for a voucher.
2. We commend HANO for setting the goals outlined on pg. 27 to reduce transaction times for landlords. However, many landlords in the above mentioned report cite long transaction times as a significant financial barrier to participating in the Housing Choice Voucher Program. We recommend that HANO include average response times and average times to process payments in order to gauge if there has been a reduction in transaction times, as well as give landlords the opportunity to make more informed decisions about potential program participation.



3. Outside of improving landlord acceptance of housing choice vouchers, HANO should consider reforms that would increase support of voucher recipients in their efforts to locate quality housing. Assistance for voucher holders should include mobility assistance in the form of case management, a high-quality and frequently updated list of units that accept housing vouchers, funding for first and last month's rent, assistance with security and utility deposits, and an expanded search time to 180 days. Although some of these reforms are included in the Community Choice Demonstration, an expanded program with support services for all will give voucher holders a higher chance of finding housing before their voucher expires and a greater likelihood of moving into a neighborhood of choice. These strategies are aimed at improving the mobility of housing choice voucher holders and decreasing the barriers for entry-level housing.

#### Furthering Fair Housing

4. The stated goal on pg. 8 to address housing discrimination for tenants is not accompanied by an action plan. HANO lists no reporting or enforcement mechanisms through which these experiences can be reported and documented. We strongly recommend HANO incorporate a reporting mechanism through which these Fair Housing violations can be documented and inform future policy and landlord participation.
5. We request that HANO spell out in clear language HANO's plans for enforcing the criminal records policy and exactly what will be required of developers moving forward for all new developments on HANO land, with PBVs, or receiving any other HANO assistance. In response to our concerns about these developments, HANO responded on pg. 58 of the 2022 Annual Plan, saying "it is our position that PBV contractors that also have tax credits will be required to follow LHC criminal background policy and that new mixed income properties developed after October 1, 2022 will fall under the new policy."

The LHC has already established that LIHTC recipients must follow its new inclusive tenant screening policy. However, the references section falls short of providing a roadmap of how HANO will operationalize

the criminal records policy. The second half of the statement about “new mixed-income properties” is extremely helpful because it would apply to the hundreds of units HANO is bringing online in partnership with private developers over the next few years, on its scattered sites. Unfortunately, that policy is not included in any of the draft plans — it appears to only exist as a comment back to LaFHAC in the 2022 plan. We encourage HANO to add this to your Admin Plan, and any other relevant plans, and explicitly state that it covers all properties with PBVs, on HANO land, or with any other HANO assistance.

6. We continue to recommend that HANO implement a reentry preference for formerly incarcerated individuals who frequently struggle to find safe, affordable housing in New Orleans. In our previous comments we outlined how HUD has focused significant attention on the barriers to housing for people with criminal records and that in many cases people with criminal records are covered by the Fair Housing Act because of the same disparate impact principle that affords coverage to many survivors of domestic violence.

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

#### Adhere to and Expand Minimum Habitability Standards

7. We encourage HANO to expand the definition of housing problems on pg. 5 to include the lack of minimum habitability standards, as recognized by the New Orleans Healthy Homes Program. With Louisiana primed to experience severe weather, from summer heat waves to tornados and flooding, it is key that HANO’s habitability standards encompass a multitude of issues. HANO should expand its

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<sup>2</sup> Lucius Couloute. “Nowhere to Go: Homelessness among formerly incarcerated people.” Prison Policy Initiative. August 2018. <https://www.prisonpolicy.org/reports/housing.html>.

minimum habitability standards to include the absence of mold and pests, and a baseline of working sinks, showers, and air conditioning. HANO should expand its guidance on lead paint on pg. 64 to include the presence and remediation of lead pipes.

8. While we commend HANO's goal to compile data from code enforcement, we recommend that this occur and be shared publicly on an annual basis. Additionally, we want to emphasize that although annual inspections of units may be a significant undertaking, sampling 20% of units, as listed on pg. 63 is inadequate and fails to address site-specific hazards for tenants.
9. We urge HANO to reconsider its decision to exclude non working cooling systems during peak heat days from its list of emergency violations. HANO's reasoning that contractors are not available to make 24 hour repairs is not one that seems to be applied uniformly. During the rare winters when temperatures drop below freezing, heating repair people are also at a premium and often not available in 24 hours.

High heat days also present far worse health hazards than lack of heat in the winter and should be treated as such. Louisiana has had record breaking heat in recent years. Black Louisianans exhibit higher rates of heat-related ER visits than their white counterparts,<sup>3</sup> meaning that the inability to maintain adequate air conditioning during declared heat emergencies is a matter of life or death and should be considered an emergency fail item in an inspection. Under the existing time standards for repairs, any repair that is deemed non-emergency allows 15 calendar days for repair (pg. 10-7). There is a significant amount of anecdotal evidence from the days immediately after Hurricane Ida to prove that this time frame poses an immediate threat to life, health, and safety of HANO residents. This is especially true for young children and elderly adults, which make up a disproportionate share of HANO residents.

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

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<sup>3</sup> *Heat Related Emergency Department Visits in Louisiana*, Louisiana Department of Health, Mar. 2024, [ldh.la.gov/assets/docs/lah/HRI\\_case-definition-and-limitations.docx.pdf](https://ldh.la.gov/assets/docs/lah/HRI_case-definition-and-limitations.docx.pdf).

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

#### Promote Upward Mobility and Expand Relocation Assistance

11. We commend HANO's goal to address mobility issues for groups with significant challenges. HANO should, however, ensure that tenants who are forced to relocate as a result of fair housing violations, discrimination, health and safety reasons, environmental hazards, or lack of minimum habitability standards are given comparable replacement housing, relocation assistance, and relocation counseling.

12. It is true that high poverty rates are pervasive throughout the New Orleans region, as noted on pg. 20. However, in order to promote upward mobility and deconcentrate poverty, HANO must make it a goal to select sites with poverty rates of 20% or less.

HANO has done important work in the past year to improve housing choice for its current and prospective clients. We believe the recommendations contained within this letter will only further the agency's work to create a more integrated city of the future that provides pathways to opportunities for all of its clients. LaFHAC remains an able and willing partner in these efforts.



December 23, 2024

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

Dear Ms. Reali:

We greatly appreciate comments from Louisiana Fair Housing Action Center (LaFHAC) regarding HANO's amendment to the Annual PHA Plan for fiscal year beginning October 1, 2024. Please note that we are amending our plan to make changes to the HCV Administrative Plan. We have not proposed amendments to the Public Housing Admissions and Continued Occupancy policy which was approved for October 1, 2024.

We have reviewed your published investigation entitled "The Mobility Myth: Housing Choice Voucher Discrimination in Orleans Parish". We agree that HANO along with its partners and stakeholders can play a pivotal role in encouraging more private landlords to accept housing choice vouchers from prospective renters, which in turn can combat voucher discrimination, create more housing opportunities, and help deconcentrate poverty.

We look forward to continuing our partnership with your organization as we work together to provide affordable housing opportunities for New Orleans residents while laying the foundation for economic sustainability. We have thoroughly reviewed your comments and recommendations. Please see our responses captured below.

#### **Admissions & Continued Occupancy Policy**

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

**HANO Response:** HANO resolved this oversight in its current ACOP effective October 1, 2024. Please review page 90 of the [current ACOP](#).

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The Housing Authority of New Orleans is an equal employer.



**LaFHAC:** The proposed ACOP includes a proposal to include rent payment habits in the Screening for Suitability (pg. 39-42). This proposal raises very serious concerns for us. There is no reason a tenant's rent payment habits in a previous unsubsidized home would have any bearing on their ability to pay rent when subsidized. In a city where 57% of renter households pay more than 30% of their income on rent, this policy could also disqualify the vast majority of applicants who need access to affordable housing. We strongly recommend that HANO refrain from using such practices. However, in the event that rent payments are used in screening as stated in this section, we urge HANO to make some sort of distinction between rent payment habits when a tenant did not have the benefits of subsidy and when they did. Though we believe it should not be used to deny a tenant admission to a subsidized unit.

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

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

#### **HCVP Administrative Plan**

**LaFHAC:** We're encouraged by the change in the time period to respond before being purged from a wait list. Though the time period was extended to 30 days, that change is still not updated in the current or draft plans (pg. 5-3 in the 2022 Admin Plan). We urge HANO to formally adopt the 30-day change and to use text messages and email communication to confirm whether people will remain on the waitlist.

**HANO Response:** The current HCVP Administrative plan effective October 1, 2024, does include the language that extends the time period to 30 days to respond to a purge of the waitlist. Please review changes on page 5-3 of the [current HCV Administrative Plan](#).

#### **PHA Plan**

##### **Expanding Utilization and Landlord Participation**

**LaFHAC:** We commend HANO on Objective 8.1 to provide an enhanced tenant portal for clients but want to note that individuals still face extensive wait times to receive a voucher even with a waitlist closed to new applicants. We strongly encourage HANO to evaluate and publish average wait times to help tenants make informed decisions. HANO should also update the waitlist statistics listed on pg. 6-7 of the PHA plan, as the current numbers are not representative of the number of individuals waiting for a voucher.

**HANO Response:** HANO is amending its approved PHA Annual Plan effective October 1, 2024. The waitlist data that is posted was a point in time datapoint as of July 15, 2024, when the PHA Annual Plan was submitted to HUD which is normally updated annually as it is not the subject of the amendment. However, the waitlist has currently been reduced to 6,289, which means that over 4,000 applicants have been contacted and either received a voucher, were deemed ineligible, or were no longer interested. We have updated the table in our amendment to reflect these recent updates.

Regarding the average wait time for applicants, HANO finds that there are too many factors to evaluate to provide an average wait time upon which an applicant can rely. The rate of providing vouchers to waitlist applicants depends on the turnover of existing vouchers (terminations, deaths, or tenant departures.). It also depends on funding availability and whether new vouchers are allocated and funded.

**LaFHAC:** We commend HANO for setting the goals outlined on pg. 27 to reduce transaction times for landlords. However, many landlords in the above-mentioned report cite long transaction times as a significant financial barrier to participating in the Housing Choice Voucher Program. We recommend that HANO include average response times and average times to process payments in order to gauge if there has been a reduction in transaction times, as well as give landlords the opportunity to make more informed decisions about potential program participation.

**HANO Response:** HANO has reviewed barriers in onboarding landlords from application to payment. HANO has found that the time for onboarding is on a case-by-case basis and is determined by several factors which include the landlord completing the package showing ownership, landlord screenings, inspections, and lease signing. Additionally, the main obstacles to onboarding are the high fail rate of properties and landlords' timeliness in completing repairs and scheduling a second inspection. Therefore, onboarding times vary greatly, and it would be difficult to provide an average time that is helpful to future landlords.

**LaFHAC:** Outside of improving landlord acceptance of housing choice vouchers, HANO should consider reforms that would increase support of voucher recipients in their efforts to locate quality housing. Assistance for voucher holders should include mobility assistance in the form of case management, a high-quality and frequently updated list of units that accept housing vouchers, funding for first and last month's rent, assistance with security and utility deposits, and an expanded search time to 180 days. Although some of these reforms are included in the Community Choice Demonstration, an expanded program with support services for all will give voucher holders a higher chance of finding housing before their voucher expires and a greater likelihood of moving into a neighborhood of choice. These strategies are aimed at improving the mobility of housing choice voucher holders and decreasing the barriers for entry-level housing.

**HANO Response:** HANO is pleased to partner with LaFHAC on the Community Choice Demonstration which provides funds to offer mobility assistance including case management, security deposit assistance, utility assistance, and a search time of 120 days. HANO continues to allow an initial search time of 120 days which far exceeds HUD's recommendation of 60 days. HANO also grants additional time when a client demonstrates unforeseen challenges during their search time or has demonstrated consistent unsuccessful efforts to locate safe, sanitary, and suitable housing within the one-hundred twenty-day search term. With the current projected budgetary shortfall for HCV vouchers due to increased payment standards, HANO is unable to provide additional mobility assistance like the grant funded assistance under the Community Choice Demonstration.



### **Furthering Fair Housing**

**LaFHAC:** The stated goal on pg. 8 to address housing discrimination for tenants is not accompanied by an action plan. HANO lists no reporting or enforcement mechanisms through which these experiences can be reported and documented. We strongly recommend HANO incorporate a reporting mechanism through which these Fair Housing violations can be documented and inform future policy and landlord participation.

**LaFHAC:** We request that HANO spell out in clear language HANO's plans for enforcing the criminal records policy and exactly what will be required of developers moving forward for all new developments on HANO land, with PBVs, or receiving any other HANO assistance. In response to our concerns about these developments, HANO responded on pg. 58 of the 2022 Annual Plan, saying "it is our position that PBV contractors that also have tax credits will be required to follow LHC criminal background policy and that new mixed income properties developed after October 1, 2022, will fall under the new policy."

The LHC has already established that LIHTC recipients must follow its new inclusive tenant screening policy. However, the references section falls short of providing a roadmap of how HANO will operationalize

**HANO Response:** LHC's criminal background policy mirrors HANO's. Therefore, developers and management companies that have both tax credit and public housing and/or PBV units already adhere to the criminal background policy. HANO owned properties also adhere to the criminal background policy. Any new properties completed after October 1, 2022, are also required to adhere to this criminal background policy. HANO in its admission to the HCV program also adheres to this criminal background policy. HANO, however, does not interfere in the private contractual relationship between tenants and HCV and PBV landlords without tax credit units, as to whether they adhere to HANO's Criminal Background Policy.

**LaFHAC:** We continue to recommend that HANO implement a reentry preference for formerly incarcerated individuals who frequently struggle to find safe, affordable housing in New Orleans. In our previous comments we outlined how HUD has focused significant attention on the barriers to housing for people with criminal records and that in many cases people with criminal records are covered by the Fair Housing Act because of the same disparate impact principle that affords coverage to many survivors of domestic violence.

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



**HANO Response:** HANO is pleased that our criminal background policy was used as a national model for other PHAs and LHC as a model to house formerly incarcerated individuals in publicly assisted housing. With this policy, HANO aims to house formerly incarcerated individuals along with the elderly, disabled, and families with children. HANO does consider homelessness, which does not preclude formerly incarcerated individuals. Therefore, it is HANO's position that it will not provide a special preference for formerly incarcerated individuals to be moved above other populations who are also at risk of homelessness.

### **Adhere to and Expand Minimum Habitability Standards**

**LaFHAC:** We encourage HANO to expand the definition of housing problems on pg. 5 to include the lack of minimum habitability standards, as recognized by the New Orleans Healthy Homes Program. With Louisiana primed to experience severe weather, from summer heat waves to tornados and flooding, it is key that HANO's habitability standards encompass a multitude of issues. HANO should expand its minimum habitability standards to include the absence of mold and pests, and a baseline of working sinks, showers, and air conditioning. HANO should expand its guidance on lead paint on pg. 64 to include the presence and remediation of lead pipes.

**HANO Response:** The definition for housing problems on page 5 is not HANO's definition. It is a term used in the collection of data by the U.S. Census Bureau in their Comprehensive Housing Assessment Survey (CHAS). They collect data related to four housing problems that they defined. CHAS data is a special tabulation to analyze housing needs, particularly for low-income households within a given jurisdiction. The Census has categorized housing problems as one or more of the following problem areas - 1) housing units lack complete kitchen facilities; 2) housing units lack complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.

**LaFHAC:** While we commend HANO's goal to compile data from code enforcement, we recommend that this occur and be shared publicly on an annual basis. Additionally, we want to emphasize that although annual inspections of units may be a significant undertaking, sampling 20% of units, as listed on pg. 63 is inadequate and fails to address site-specific hazards for tenants.

**HANO Response:** HANO partnered with the City of New Orleans in developing goals to affirmatively further fair housing. Some goals are led by the City of New Orleans while others are led by HANO. The goal to expand efforts in creating equitable healthy housing recognizes the direct connections between healthy housing and quality of life; with a strategy to develop and implement a strategic plan to address environmental hazards including lead, mold, and toxic waste is led by the City's Office of Community Development and Code Enforcement. Progress towards this goal is demonstrated in the fact that the City will continue to use its lead-based policy to ensure that rehabilitated homes under its auspices are free from lead-based paint contamination. HANO, for its part, is committed to conducting HQS inspections for all new HCV units and on an annual basis for existing HCV units for approximately 18,000 households. HANO also inspects all public housing units yearly, which is in addition to our HUD REAC inspections (now NSPIRE) which inspect 20% of the units. This language will be updated on our AFFH table. HANO does not compile code enforcement data; that is a responsibility of the City of New Orleans.

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

High heat days also present far worse health hazards than lack of heat in the winter and should be treated as such. Louisiana has had record breaking heat in recent years. Black Louisianans exhibit higher rates of heat-related ER visits than their white counterparts, meaning that the inability to maintain adequate air conditioning during declared heat emergencies is a matter of life or death and should be considered an emergency fail item in an inspection. Under the existing time standards for repairs, any repair that is deemed non-emergency allows 15 calendar days for repair (pg. 10-7). There is a significant amount of anecdotal evidence from the days immediately after Hurricane Ida to prove that this time frame poses an immediate threat to life, health, and safety of HANO residents. This is especially true for young children and elderly adults, which make up a disproportionate share of HANO residents.

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

**HANO Response:** All HCV landlords are subjected to local laws. Therefore, HANO has notified all HCV landlords that they are required to comply with the [Healthy Homes Ordinance](#) of the City of New Orleans, which requires immediate repairs and also provides increased standards of heating and cooling than is required by HUD. As you may know, under HUD HQS protocol, cooled air is not a requirement, but if the landlord provides, it must operate as designed. However, under the Healthy Homes Ordinance, rental housing units must have heating facilities that can maintain a minimum room temperature of 68°F and all bedrooms must have a cooling system that can maintain a maximum temperature of 80°F.

The HCV Administrative Plan is in accordance with HUD's HQS inspection protocols and requires landlords to adhere to local laws. HANO is willing to add language that references landlords' responsibility to adhere to the City of New Orleans Healthy Home Ordinance.

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



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

**Promote Upward Mobility and Expand Relocation Assistance**

**LaFHAC:** We commend HANO's goal to address mobility issues for groups with significant challenges. HANO should, however, ensure that tenants who are forced to relocate as a result of fair housing violations, discrimination, health and safety reasons, environmental hazards, or lack of minimum habitability standards are given comparable replacement housing, relocation assistance, and relocation counseling.

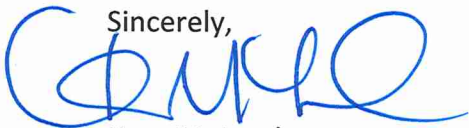
**HANO Response:** HANO allows tenants flexibility of selecting their preferred housing unit and provides 120 days to search for replacement housing, this far exceeds HUD's requirement of 60 days. HANO is not in a financial position to provide relocation assistance and relocation counseling for HCV households as HANO has a projected budgetary shortfall for HCV for 2025.

**LaFHAC:** It is true that high poverty rates are pervasive throughout the New Orleans region, as noted on pg. 20. However, in order to promote upward mobility and deconcentrate poverty, HANO must make it a goal to select sites with poverty rates of 20% or less.

**HANO Response:** The Project-Based Voucher (PBV) program provides unique flexibility to providing affordable housing in low poverty areas. HANO continues to balance the great need for affordable units in the City of New Orleans with the desire to place units in the few low poverty areas within the city. We remain committed to the goals in HANO's Affirmatively Further Fair Housing plan (AFFH). HANO, in accordance with new HOTMA regulations, has allowed an increase of PBV assistance to the greater of 25 units or 40 percent of the number of dwelling units if the project is located in census tracts with a poverty rate of 20 percent or less.

Thank you for your ongoing support in addressing these important housing and community development issues. Should you have questions or need additional information, I can be reached at (504) 670-3400.

Sincerely,



Keva M. Landrum  
Interim Executive Director

Cc: Monique Blossom, LaFHAC Director of Policy and Communications



December 20, 2024

Housing Authority of New Orleans  
Executive Department  
4100 Touro Street  
New Orleans, LA 70122

*By electronic mail only to [info@hano.org](mailto:info@hano.org)*

To Whom it May Concern:

We thank you for the opportunity to submit public comment on HANO's amended Public Housing Agency Annual Plan for fiscal year beginning October 1, 2024, and HANO's revisions to the HCV Administrative Plan for the same fiscal year. We write to address HANO's specific plans to reposition public housing units at the Estates at Desire property ("Estates") to PBV units using the Section 18 disposition process, and generally regarding HANO's policy governing such repositioning projects. We urge HANO to preserve and codify public housing tenant protections for units converted to PBV and take steps to guarantee long term affordability. We also write to urge HANO to add to its Administrative Plan draft three new elective policies available under Section 101 of HOTMA that provide protections for tenants facing displacement and/or homelessness due to failed inspections: (a) the ability to use withheld or abated rent to pay relocation costs, (b) the ability to allow tenants to move into a unit where there are non-life-threatening deficiencies, and (c) the ability to use alternative inspections.

NHLP's mission is to advance housing justice for people living in poverty and their communities. NHLP achieves this by strengthening and enforcing the rights of tenants and increasing housing opportunities for underserved communities. Our organization also provides technical assistance and policy support on a range of housing issues to legal services and other advocates nationwide. NHLP hosts the national Housing Justice Network (HJN), a network of over 2,000 community-level housing advocates and resident leaders. HJN member organizations are committed to protecting affordable housing and residents' rights for low-income families across the country.

The Louisiana Fair Housing Action Center (LaFHAC) is a private, nonprofit civil rights organization established in 1995 to eradicate housing discrimination across Louisiana. Through Fair Housing education, investigation, enforcement, policy and eviction prevention, LaFHAC promotes equal opportunity in all housing transactions including rental, sales, lending, and insurance. LaFHAC is dedicated to fighting housing discrimination not only because it is illegal, but also because it is a divisive force that perpetuates poverty, segregation, ignorance, fear, and hatred.

Southeast Louisiana Legal Services (SLLS) is the free civil legal aid provider serving low-income families across twenty-two parishes, including Orleans Parish. SLLS's mission is to achieve justice for low-income people in Louisiana by enforcing and defending their legal rights through civil legal aid, advocacy, and community education. SLLS's clients include participants in housing subsidy programs administered by HANO.

### **A. Conversion of public housing units to PBV using Section 18 disposition process**

The proposed Annual Plan describes HANO's work-out plan for the Estates following a default by the Michaels Organization. Under the plan, HANO intends to use the disposition process under Section 18 of the U.S. Housing Act of 1937 ("Section 18") to transfer the public housing units at the Estates to HANO-controlled entities. At that point, the 127 public housing units remaining at the Estates will be removed from the federal public housing program. HANO then plans to award a PBV contract to subsidize the units. The amendments to the section on "Exceptions to a Competitive (sic) Selection Process" in HANO's Administrative Plan expand HANO's ability to apply Project-Based Voucher ("PBV") contracts to HANO-operated and third party-operated sites where public housing has been removed from the inventory through a disposition or other repositioning process.

The undersigned organizations appreciate HANO's commitment to preserving the public housing units at the Estates as deeply affordable housing, and understand the compromised position HANO finds itself in following the Michaels Organization default. However, the PBV program has substantially fewer tenant protections than the public housing program, and the Section 18 disposition process lacks certain requirements that are necessary to preserve existing tenancies and long term affordability. The following are recommendations to strengthen the plan to reposition the Estates' remaining public housing units to PBV, and HANO's policies generally regarding this repositioning strategy:

#### **1. HANO should guarantee the preservation of existing public housing tenant rights and protections after Section 18 disposition and transition of the Estates to PBV assistance, consistent with requirements under the Rental Assistance Demonstration (RAD).**

HUD's RAD program is a preservation tool which requires the preservation of all existing public housing tenant protections under Sections 6 and 9 of the 1937 Act after public housing conversion to Section 8 PBV or Project-Based Rental Assistance ("PBRA"). These core RAD protections include:

- the right to remain and/or to return without rescreening if temporary displacement is necessary, and protection for over-income tenants;
- continued mandatory lease provisions under 24 C.F.R. § 966.4, including the new right to a 30-day notice and right to cure nonpayment of rent;
- the right to pay rent that does not exceed 30% of the household's adjusted gross income;
- grievance rights under 24 C.F.R. §§ 966.4(n), 966.54 and 966.56;
- tenant participation rights under 24 C.F.R. part 964;
- the right to relocation benefits and advisory services if temporary relocation is necessary; and
- a guarantee of one-for-one replacement and permanent deep affordability of the public housing replacement units.

Although HANO has not chosen to use RAD to reposition the remaining public housing at the Estates, its planned process of transferring ownership, removing public housing units, and awarding a PBV contract, will achieve the end-goal of RAD: to move the public housing units to a more sustainable subsidy. However, without additional safeguards, tenants will not benefit from the protections they would have under the RAD program. These protections are critical to ensure that tenants do not lose rights with the conversion to PBV. Therefore, in addition to any HUD-required Use Agreement under Section 18, the Administrative Plan should expressly require the recordation of an additional HANO Use Agreement which includes required provisions of the RAD Use Agreement. These provisions include (a) survival of affordability requirements

notwithstanding any transfer of ownership including through foreclosure or bankruptcy, (b) enforceability of tenant rights and protections by residents and applicants, and (c) required renewal of the PBV HAP contract each time it expires during the term of the Use Agreement. In addition, the HANO Use Agreement should include the tenant protections required under RAD as outlined above. The Administrative Plan should require that the HANO Use Agreement be for a term of 99 years to mirror the terms of HANO's existing ground lease on the property.

**2. HANO should guarantee submission of an application for maximum eligible number of Tenant Protection Vouchers in connection with the Section 18 disposition of the Covered Project.**

Under current applicable guidance, HANO should qualify for replacement Tenant Protection Vouchers ("TPVs") for units occupied in the last 24 months when its disposition application is approved. To avoid a permanent net loss of available subsidies administered by HANO, HANO should commit to applying for those TPVs to replace the vouchers used from HANO's inventory to subsidize the former public housing units, and should codify this commitment in its Administrative and Annual Plans.

**3. HANO should guarantee the meaningful consultation and solicitation of support of directly impacted residents, and any resident organizations.**

The U.S. Housing Act and HUD regulations require that HANO consult with residents who will be affected by the proposed disposition application under Section 18, as well as any resident organization for the development, PHA-wide resident organizations, and the Resident Advisory Board. At the very least, residents will be affected by the switch to PBV based on the loss of public housing rights outlined above. Therefore consultation is mandatory.

We recommend that except where a *de minimus* exception applies, HANO should adopt the heightened resident consultation and relocation planning requirements under RAD as outlined in HUD Notice PIH/H 2016-17. Even in cases where residents initially may not appear to be required to relocate, repositioning plans may change, and compliance with the RAD requirements ensures that the PHA's repositioning activity is consistent with all applicable civil rights requirements. As such, HANO should expressly incorporate the RAD program's resident consultation requirements in its Administrative Plan, and include details about its resident consultation plans for the Section 18 disposition of the Estates in its Annual Plan.

For your convenience, the undersigned recommend that HANO adopt the following changes to the proposed documents:

**ADMINISTRATIVE PLAN:**

The undersigned recommend the following provisions to Section 22.4.3:

(5) When HANO applies to remove public housing units from the public housing inventory through a legal removal tool as part of an effort to convert the unit to a PBV subsidy, HANO shall:

1. Promptly submit an application for the maximum number of Tenant Protection Vouchers awarded by HUD pursuant to approval of any repositioning application; and

2. Comply with all resident consultation requirements of HUD Notice PIH/H 2016-17 applicable to RAD conversions.

(6) When HANO awards a PBV contract to a property that has undergone removal from the public housing inventory, HANO shall record a HANO Use Agreement that, at minimum, incorporates the required provisions of the RAD Use Agreement including, but not limited to, (a) the requirement that the PHA offer, and the owner accept, renewal of the PBV HAP contract each time it expires during the term of the Use Agreement; (b) survival of affordability requirements notwithstanding any transfer of ownership including through foreclosure or bankruptcy; and (c) enforceability of tenant rights and protection by residents and applicants. In addition, the HANO Use Agreement should include the following protections that are available to tenants undergoing a RAD conversion:

1. The right to remain and/or to return without rescreening if temporary displacement is necessary, and protection for over-income tenants;
2. Continued mandatory lease provisions under 24 C.F.R. § 966.4, including the new right to a 30-day notice and right to cure nonpayment of rent;
3. The right to the rent calculation not to exceed 30% of the household's adjusted gross income;
4. Grievance rights under 24 C.F.R. §§ 966.4(n), 966.54 and 966.56;
5. Tenant participation rights under 24 C.F.R. part 964;
6. The right to relocation benefits and advisory services if temporary relocation is necessary; and
7. A guarantee of one-for-one replacement and permanent deep affordability of the public housing replacement units.

#### **ANNUAL PLAN:**

HANO should add details about how it will preserve public housing tenants' rights and long-term affordability, as outlined above, to the discussion in the proposed Annual Plan about the Estates repositioning project. HANO should also add details about its resident consultation plan with respect to the project.

The undersigned are happy to work with HANO on appropriate language to include in the PHA Plan and the Administrative Plan.

#### **B. Incorporation of Optional Policies from Section 101 of HOTMA**

Although HUD has extended the deadline for PHAs to bring their Administrative Plans into compliance with HOTMA until June 6, 2025 pursuant to Notice PIH 2024-19, that notice also specifies that "when PHAs desire to use program flexibilities requiring adoption of new local policies not already present in the PHA's Administrative Plans, PHAs must add those policies to their Administrative Plans, in a manner consistent with the HOTMA voucher final rule, before using those program flexibilities." As such, "HUD recommends that PHAs make updates to their Administrative Plans at their earliest opportunity."<sup>1</sup> In other words, certain optional policies cannot be implemented until HANO updates its Administrative Plan to

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<sup>1</sup> HOTMA HCV and PBV Final Rule – Guidance on Effective and Compliance Dates and PHA Implementation Preparation, PIH 2024-19, 5 (June 5, 2024).

include them.

Section 101 of HOTMA adds new flexibilities for PHAs in the inspection process for the HCV program. Due to the extremely tight housing market in New Orleans, the high rate of voucher discrimination,<sup>2</sup> and HANO's decision to switch payment standards to 100% of FMR in conjunction with its use of exception payment standards, tenants face extreme barriers to securing housing under the program and a high risk of subsidy loss. We urge HANO to adopt three optional policies and update its Administrative Plan immediately so that these policies can be put in effect. These policies are:

1. **Ability to use up to two months of withheld and abated HAP payments to pay the tenant's relocation costs, including security deposits, application fees, and moving costs. 24 C.F.R. § 982.404(e)(3).** Moving places an enormous financial strain on families who, in this case, are moving due to their landlord's noncompliance. Landlords rarely return security deposits in a timely manner or without a legal fight, and families living paycheck to paycheck, or disability check to disability check, simply do not have extra money to pay moving expenses or storage while staying current on their utilities, tenant portion of rent, and other expenses. As a result, families frequently lose much of their furniture and personal property each time they move. Repurposing abated or withheld rent to help tenants move will make a forced program move less financially catastrophic, and reduce the risk of subsidy loss due to inability to come up with the money necessary to pay a new deposit up front.
2. **Ability to move into a unit with no life-threatening deficiencies. 24 C.F.R. § 982.405(j).** Tenants frequently face periods of homelessness when moving between assisted units, because it is nearly impossible for a tenant to locate a unit and then get it through inspection and contract signing in the 60 day notice period HANO typically requires of tenants making a program move. Often move-in delays result from an initial failed inspection for minor issues that can easily be corrected once the tenant moves in. HOTMA allows PHAs to elect a policy where tenants can move into a unit that fails inspection, as long as it does not fail for life-threatening deficiencies. After the HAP contract is signed the landlord has 30 days to make the remaining repairs before abatement. The undersigned believe that adoption of this policy will help prevent families from experiencing temporary homelessness by expediting lease-up, while preserving the family's right to safe, habitable housing under the program. It may also encourage landlord participation by helping to get tenants into units faster. The policy should indicate that tenants may only move in under these circumstances if both the tenant and the landlord wish to opt into the optional policy.
3. **Ability to use alternative initial inspections. 24 C.F.R. § 982.406.** Section 101 of HOTMA also adds flexibility by allowing PHAs to rely on alternative program inspections. The undersigned encourage HANO to adopt this policy for initial inspections, especially given the high number of vouchers used at LIHTC properties, which receive their own inspections. Adopting this policy should not interfere with a participant's ability to request a special inspection at any time in the event of a HQS violation.

In addition to these optional policies that we ask HANO to adopt immediately, we encourage HANO

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<sup>2</sup> Louisiana Fair Housing Action Center, *The Mobility Myth: Housing Choice Voucher Discrimination in Orleans Parish* (Sept. 2024), <https://lafairhousing.org/wp-content/uploads/2024/08/Enterprise-Report-Final-8.29.24reduced.pdf>.



to update its Administrative Plan to reflect other changes under Section 101 as soon as possible. Tenants with a HAP contract executed or renewed on or after June 6, 2024 who are forced to move because of failed inspections have significant additional rights under HOTMA that are currently enforceable. For example, HANO must give these tenants a longer voucher term if necessary to lease a new unit. 24 C.F.R. § 982.404(e)(1). If the tenant's search term expires, and HANO chooses not to extend it, HANO must offer the family a selection reference for an appropriate-size public housing unit that first becomes available. 24 C.F.R. § 982.404(e)(2). These provisions are not optional and are in effect even before the Administrative Plan is updated.<sup>3</sup> To avoid confusion, the undersigned urge HANO to update its Administrative Plan with the new rules as soon as possible.<sup>4</sup>

Thank you in advance for your consideration of these comments. We look forward to your response and can be reached through Hannah Adams at 504-321-3302 or hadams@nhlp.org.

Sincerely,



Hannah Adams  
Senior Staff Attorney  
National Housing Law Project

Ameca Reali  
Executive Director  
Louisiana Fair Housing Action Center

Amanda Golob  
Supervising Attorney, Housing Unit  
Southeast Louisiana Legal Services

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<sup>3</sup> HUD Notice PIH 2024-19, *supra* note 1.

<sup>4</sup> Though some provisions of HOTMA related to income, assets, and recertification have been delayed due to the delayed implementation of the HIP system, the implementation of Section 101 has not been delayed.



December 25, 2024

Hannah Adams  
Senior Staff Attorney  
Southeast Louisiana Legal Services  
1340 Poydras, St. Suite 600  
New Orleans, Louisiana 70112

Dear Ms. Adams:

Thank you for submitting comments on behalf of the National Housing Law project, a collaborative of Southeast Louisiana Legal Services (SLLS) and Louisiana Fair Housing Action Center (LaFHAC) regarding HANO's amendment to the Annual PHA Plan. We look forward to a continued collaboration with your organization as we work to provide affordable housing opportunities for New Orleans residents. We have thoroughly reviewed your comments and our responses to your comments are captured below.

#### **A. Conversion of public housing units to PBV using Section 18 disposition process**

##### **NHLP 1. HANO should guarantee the preservation of existing public housing tenant rights and protections after Section 18 disposition and transition of the Estates to PBV assistance, consistent with requirements under the Rental Assistance Demonstration (RAD).**

HUD's RAD program is a preservation tool which requires the preservation of all existing public housing tenant protections under Sections 6 and 9 of the 1937 Act after public housing conversion to Section 8 PBV or Project-Based Rental Assistance ("PBRA"). These core RAD protections include:

- the right to remain and/or to return without rescreening if temporary displacement is necessary, and protection for over-income tenants;
- continued mandatory lease provisions under 24 C.F.R. § 966.4, including the new right to a 30-day notice and right to cure nonpayment of rent;
- the right to pay rent that does not exceed 30% of the household's adjusted gross income;
- grievance rights under 24 C.F.R. §§ 966.4(n), 966.54 and 966.56;
- tenant participation rights under 24 C.F.R. part 964;
- the right to relocation benefits and advisory services if temporary relocation is necessary; and
- a guarantee of one-for-one replacement and permanent deep affordability of the public housing replacement units.

Although HANO has not chosen to use RAD to reposition the remaining public housing at the Estates, its planned process of transferring ownership, removing public housing units, and awarding a PBV contract, will achieve the end-goal of RAD: to move the public housing units to a more sustainable subsidy. However, without additional safeguards, tenants will not benefit from the protections they

would have under the RAD program. These protections are critical to ensure that tenants do not lose rights with the conversion to PBV. Therefore, in addition to any HUD-required Use Agreement under Section 18, the Administrative Plan should expressly require the recordation of an additional HANO Use Agreement which includes required provisions of the RAD Use Agreement. These provisions include (a) survival of affordability requirements notwithstanding any transfer of ownership including through foreclosure or bankruptcy, (b) enforceability of tenant rights and protections by residents and applicants, and (c) required renewal of the PBV HAP contract each time it expires during the term of the Use Agreement. In addition, the HANO Use Agreement should include the tenant protections required under RAD as outlined above. The Administrative Plan should require that the HANO Use Agreement be for a term of 99 years to mirror the terms of HANO's existing ground lease on the property.

**HANO Response 1:** HANO aims to preserve long-term affordability at The Estates, formerly Desire, by converting public housing units to project-based voucher units (PBV). Therefore, the suggestions are consistent with HANO's intent. HANO is reviewing applicable HUD regulations to assess whether all of the suggestions can be implemented under the Project Based Voucher (PBV) rules without RAD. Please note that HANO will be including a HANO Use agreement that will run coterminous with the ground leases. HANO is also in agreement with adhering to the following core protections:

- continued mandatory lease provisions including the new right to a 30-day notice and right to cure nonpayment of rent;
- a guarantee of one-for-one replacement and permanent deep affordability of the public housing replacement units with PBV units
- the right to pay rent that does not exceed 30% of the household's adjusted gross income as part of the participation in the PBV program;
- grievance rights: and
- tenant participation rights.

**NHLP 2. HANO should guarantee submission of an application for maximum eligible number of Tenant Protection Vouchers in connection with the Section 18 disposition of the Covered Project.**

Under current applicable guidance, HANO should qualify for replacement Tenant Protection Vouchers ("TPVs") for units occupied in the last 24 months when its disposition application is approved. To avoid a permanent net loss of available subsidies administered by HANO, HANO should commit to applying for those TPVs to replace the vouchers used from HANO's inventory to subsidize the former public housing units, and should codify this commitment in its Administrative and Annual Plans.

**HANO Response 2:** HANO agrees and has submitted an application for Tenant Protection vouchers for all of the public housing units. There are no long-term vacant units at the site.

**NHLP 3. HANO should guarantee the meaningful consultation and solicitation of support of directly impacted residents, and any resident organizations.**

The U.S. Housing Act and HUD regulations require that HANO consult with residents who will be affected by the proposed disposition application under Section 18, as well as any resident organization for the development, PHA-wide resident organizations, and the Resident Advisory Board. At the very least, residents will be affected by the switch to PBV based on the loss of public housing rights outlined above. Therefore consultation is mandatory.

We recommend that except where a *de minimus* exception applies, HANO should adopt the heightened resident consultation and relocation planning requirements under RAD as outlined in HUD Notice PIH/H 2016-17. Even in cases where residents initially may not appear to be required to relocate, repositioning plans may change, and compliance with the RAD requirements ensures that the PHA's repositioning activity is consistent with all applicable civil rights requirements. As such, HANO should expressly incorporate the RAD program's resident consultation requirements in its Administrative Plan, and include details about its resident consultation plans for the Section 18 disposition of the Estates in its Annual Plan.

For your convenience, the undersigned recommend that HANO adopt the following changes to the proposed documents:

**ADMINISTRATIVE PLAN:**

The undersigned recommend the following provisions to Section 22.4.3:

(5) When HANO applies to remove public housing units from the public housing inventory through a legal removal tool as part of an effort to convert the unit to a PBV subsidy, HANO shall:

1. Promptly submit an application for the maximum number of Tenant Protection Vouchers awarded by HUD pursuant to approval of any repositioning application; and
2. Comply with all resident consultation requirements of HUD Notice PIH/H 2016-17 applicable to RAD conversions.

(6) When HANO awards a PBV contract to a property that has undergone removal from the public housing inventory, HANO shall record a HANO Use Agreement that, at minimum, incorporates the required provisions of the RAD Use Agreement including, but not limited to, (a) the requirement that the PHA offer, and the owner accept, renewal of the PBV HAP contract each time it expires during the term of the Use Agreement; (b) survival of affordability requirements notwithstanding any transfer of ownership including through foreclosure or bankruptcy; and (c) enforceability of tenant rights and protection by residents and applicants. In addition, the HANO Use Agreement should include the following protections that are available to tenants undergoing a RAD conversion:

1. The right to remain and/or to return without rescreening if temporary displacement is necessary, and protection for over-income tenants;
2. Continued mandatory lease provisions under 24 C.F.R. § 966.4, including the new right to a 30-day notice and right to cure nonpayment of rent;
3. The right to the rent calculation not to exceed 30% of the household's adjusted gross income;
4. Grievance rights under 24 C.F.R. §§ 966.4(n), 966.54 and 966.56;
5. Tenant participation rights under 24 C.F.R. part 964;
6. The right to relocation benefits and advisory services if temporary relocation is necessary; and
7. A guarantee of one-for-one replacement and permanent deep affordability of the public housing replacement units.

**HANO Response 3:** HANO has undergone robust resident consultation as part of the conversion and in adherence to regulatory requirements. A RAB meeting was held October 16, 2024, to discuss HANO's intent to apply for disposition under Section 18 of the Act. It was explained through the Section 18 application approval, the public housing units would be changed to project-based vouchers to enable the development to generate income that would support the operational needs. An

additional community meeting was held November 7, 2024, with the residents of the development. Following this meeting, another RAB meeting was held on November 20, 2024, to consult with residents on the Desire conversion. In addition, HANO plans to conduct ongoing meetings with residents once it controls the property.

Regarding additional language placed in the Administrative Plan that addresses this special conversion at Desire, HANO is following regulatory guidance based on these particular circumstances which may not apply to future conversions, if any. Therefore, HANO will not restate these regulatory requirements in the Administrative Plan.

**NHLP Annual Plan:** HANO should add details about how it will preserve public housing tenants' rights and long-term affordability, as outlined above, to the discussion in the proposed Annual Plan about the Estates repositioning project. HANO should also add details about its resident consultation plan with respect to the project.

**HANO Response Annual Plan:** HANO agrees to add language in the amendment to the Annual PHA Plan regarding preserving public housing tenants' rights and long-term affordability as mentioned in HANO Response 1.

## **B. Incorporation of Optional Policies from Section 101 of HOTMA**

**NHLP 1. Ability to use up to two months of withheld and abated HAP payments to pay the tenant's relocation costs, including security deposits, application fees, and moving costs. 24 C.F.R. § 982.404(e)(3).** Moving places an enormous financial strain on families who, in this case, are moving due to their landlord's noncompliance. Landlords rarely return security deposits in a timely manner or without a legal fight, and families living paycheck to paycheck, or disability check to disability check, simply do not have extra money to pay moving expenses or storage while staying current on their utilities, tenant portion of rent, and other expenses. As a result, families frequently lose much of their furniture and personal property each time they move. Repurposing abated or withheld rent to help tenants move will make a forced program move less financially catastrophic, and reduce the risk of subsidy loss due to inability to come up with the money necessary to pay a new deposit up front.

**HANO Response B1:** HANO is considering accepting this HOTMA discretionary policy for the next fiscal year beginning October 1, 2025. Before making a decision, HANO will complete a financial analysis and determine additional procedures that will be necessary to implement this policy.

**NHLP 2. Ability to move into a unit with no life-threatening deficiencies. 24 C.F.R. § 982.405(j).** Tenants frequently face periods of homelessness when moving between assisted units, because it is nearly impossible for a tenant to locate a unit and then get it through inspection and contract signing in the 60 day notice period HANO typically requires of tenants making a program move. Often move-in delays result from an initial failed inspection for minor issues that can easily be corrected once the tenant moves in. HOTMA allows PHAs to elect a policy where tenants can move into a unit that fails inspection, as long as it does not fail for life-threatening deficiencies. After the HAP contract is signed the landlord has 30 days to make the remaining repairs before abatement. The undersigned believe that adoption of this policy will help prevent families from experiencing temporary homelessness by

expediting lease-up, while preserving the family's right to safe, habitable housing under the program. It may also encourage landlord participation by helping to get tenants into units faster. The policy should indicate that tenants may only move in under these circumstances if both the tenant and the landlord wish to opt into the optional policy.

**HANO Response B2:** HANO is reviewing all HOTMA discretionary policies to determine if the agency should implement for fiscal year beginning October 1, 2025. This policy will be considered and will be placed in the respective policy documents and Annual PHA Plan for the upcoming fiscal year, if HANO decides to accept. We appreciate that you have thoughtfully provided support for this policy.

**NHLP 3. Ability to use alternative initial inspections. 24 C.F.R. § 982.406.**

Section 101 of HOTMA also adds flexibility by allowing PHAs to rely on alternative program inspections. The undersigned encourage HANO to adopt this policy for initial inspections, especially given the high number of vouchers used at LIHTC properties, which receive their own inspections. Adopting this policy should not interfere with a participant's ability to request a special inspection at any time in the event of a HQS violation.

**HANO Response B3:** HANO does rely on alternative inspections from entities like LHC when determining biennial inspections. HANO will consider utilizing the alternative inspection discretionary HOTMA policy for fiscal year beginning October 1, 2025, where if accepted, the policy will be included in the Annual PHA Plan for FYB October 1, 2025, and accompanying policy documents.

**NHLP General:** In addition to these optional policies that we ask HANO to adopt immediately, we encourage HANO to update its Administrative Plan to reflect other changes under Section 101 as soon as possible. Tenants with a HAP contract executed or renewed on or after June 6, 2024 who are forced to move because of failed inspections have significant additional rights under HOTMA that are currently enforceable. For example, HANO must give these tenants a longer voucher term if necessary to lease a new unit. 24 C.F.R. § 982.404(e)(1). If the tenant's search term expires, and HANO chooses not to extend it, HANO must offer the family a selection reference for an appropriate-size public housing unit that first becomes available. 24 C.F.R. § 982.404(e)(2). These provisions are not optional and are in effect even before the Administrative Plan is updated. To avoid confusion, the undersigned urge HANO to update its Administrative Plan with the new rules as soon as possible.

**HANO Response General:** HANO is aware that it must give the tenant at least 90 days or longer to search for a unit when the tenant had to vacate for failure to correct HQS deficiencies. HANO's Administrative Plan, Section 7.3.1 on page 7-2 or 61 if scrolling online, states that "the initial voucher term will be 120 calendar days. Additional extensions may be granted due to extenuating circumstances on at HANO's approval." However, we appreciate that you have brought to our attention that Section 10.6.2 was not updated to reflect this 120-day term. HANO will update Section 10.6.2 as follows:

*"If the unit fails again at re-inspection, a new voucher will be issued upon the second fail. Generally, HANO will not terminate the contract until the family finds another unit, provided the family does so in a reasonable time (generally 60-120 calendar days). HANO will issue a Voucher to permit the family to move to another unit. On a case-by-case basis, HANO may allow abatement past sixty days when the family has made reasonable efforts to find a new unit but has not been successful. If the family is unable*

*to lease a new unit within the period provided including extensions, HANO shall offer, and, if accepted, provide the family a selection preference for an appropriate-size public housing unit that first becomes available for occupancy.”*

Thank you for your ongoing support in addressing these important housing and community development issues. Should you have questions or need additional information, I can be reached at (504) 670-3400.

Sincerely,



Keva Landrum  
Interim Executive Director



NEW ORLEANS  
CITYWIDE TENANT ASSOCIATION

November 11, 2024

Carol Johnson  
Chairman Board of Commissioner  
Housing Authority of New Orleans  
4100 Touro Street  
New Orleans, Louisiana 70125

**Re: The Estate/Michael Development**

Dear Commissioner Johnson,

The Citywide Tenant Association/Resident Advisory Board members attended the recent resident meeting at the (Desire) Estate whereby HANO Interim Executive Director Keva Landrum, HANO Deputy Director Felecia Stewart, and HANO Asset Manager Christa Goodick informed the residents that HANO is in the process of changing the management structure at the Estate.

As indicated in our previous letter to the board we recognize the property has matured tax credit period and HANO needs to take the necessary steps to ensure the property functions in much the same way as providing affordable housing essentially to the current population and its incoming population. However, we have concerns regarding the major recapitalization as we're not sure the amount of work the property will need as such, we're wondering will there be enough work to recapitalize the property such that the property meet the recapitalization process. We understand HANO is proposing to apply for a new round of tax credits to improve upon the current conditions and that the agency intends to convert the property to the project base vouchers program, by way of Section 18 and as stated in our previous letter we agree.

In October 2024, the Housing Authority of New Orleans issued two solicitations seeking private management companies for the management of its portfolio for which we objected to. Our objection was expressed doing a Resident Advisory meeting and is based on historical experiences we have seen in the past from outside private companies. The Estate is a prime example of private management only interest, which is their bottom line (profit) and not the conditions families are subjected to i.e. poor maintenance, shortage of staff, lack of knowledge on public housing management mandates, and the violation of residents' rights which is what we heard from residents privately at the Estate meeting. Because of what we know and have seen, the Citywide Tenant Association, and the Resident Advisory Board submit this letter requesting that HANO take over the management of the Estate and to not bring in another private management company. We believe HANO managing its own property is in the best interest of HANO and its residents.

We also want to note that during the Estate Resident meeting residents openly expressed their desire to manage their own community under the Resident Management Corporation concept. While we support resident management, we recognize training would be required for such, and we support the residents



and their request for HANO to consider Resident Management, which is successful here in our city and others around the country.

We also want to inform you that the residents have also asked that HANO conduct a review on the status of the lawsuit that was won by the Desire residents (1996) and provide them with an update on when HANO will settle the case that was won. We respectfully ask that the HANO Commission support the residents request and instruct HANO Executives to investigate the request.

We appeal to this board on behalf of the Estate residents and reject privatization.

Respectfully submitted,

Citywide Tenant Association/Resident Advisory Board

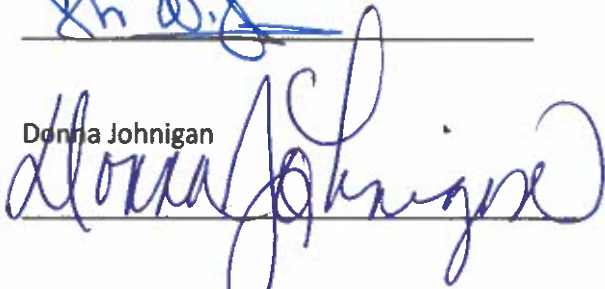
Cynthia Wiggins



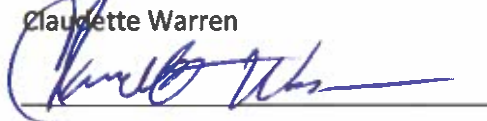
Kathleen Matthew



Donna Johnigan



Claudette Warren



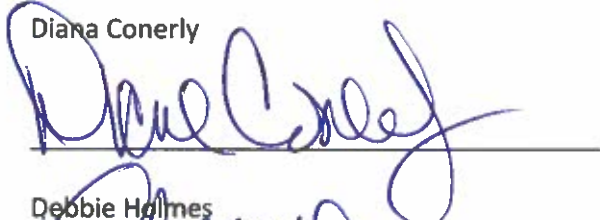
Constance Haynes



Kim Piper



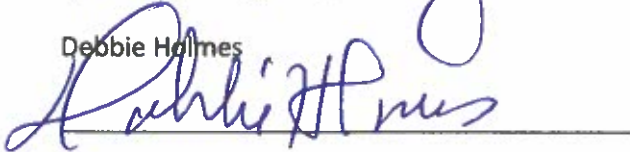
Diana Conerly



Cheryl Carter



Debbie Holmes



Cc: Congressman Troy Carter  
New Orleans City Council  
Department of Housing and Urban Development

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

<u>Goal</u>	<u>Strategy</u>	<u>Fair Housing Issue</u>	<u>Contributing Factor</u>	<u>Timeframe for Action</u>	<u>Measure of Achievement</u>	<u>Responsible Program Participant(s)</u>	<u>Status</u>
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Reserve publicly owned land in high-opportunity neighborhoods for affordable housing.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	20% of qualified tax adjudicated property is made available for development through OCD, NORA, HANO NOFAs.	OCD, HANO, NORA	HANO in partnership with the New Orleans Redevelopment Authority (NORA) and the City of New Orleans Office of Community Development (OCD) reserved publicly owned land in the high opportunity neighborhoods of Tremé that were made available for development in a 2016 NOFA. Under this NOFA 30 parcels were made available resulting in 11 homeownership units and 22 rental units.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Prioritize public subsidy for development in high-opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	OCD, NORA, HANO NOFAs reflect priority in scoring for developments in high opportunity neighborhoods.	OCD, HANO, NORA, FANO	Redevelopment of the Bywater units saw a reduction from 136 to 82 affordable housing units eliminating the market rate units. The developer will submit a 4% LIHTC application to the Louisiana Housing Corporation CBDG Prime 3 in spring 2024

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

							Community Choice Demonstration, which will help families with children move to areas of opportunity. The CCD offers expedited leasing, landlord incentives for participation, and a damage mitigation fund. There is also a dedicated Leasing Coordinator position to help with landlord recruitment.
<b>Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Provide rental registry landlords with information on how to become an HCV landlord to expand program participation in coordination with the City's rental registry timeline	Segregation R/ECAP Disproportionate Housing	Location and type of affordable housing; Community opposition; Private Discrimination; Impediments to Mobility	3 - 5 yrs	Decrease HCV properties in R/ECAP areas from 33% according to HUD tables to 30% by 2021 and increase HCV properties in non-R/ECAPs to 70%.	HANO	The City of New Orleans began registering landlords in the spring of 2024. HANO has provided information to landlords regarding the registry at HANO landlord meetings and has urged landlords to register.

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

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



<p><b>and enforcement activities, in coordination and with fair housing organizations.</b></p>	<p>targeted populations through collaboration with NORD-C, Office of Neighborhood Engagement, One Stop Shop, and HANO.</p>					<p>Engagement, NORD-C, CPC, HANO</p>	
<p><b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b></p>	<p>Increase awareness about fair housing issues, resources, and equitable outcomes through enhanced media outreach especially during Fair Housing Month each year.</p>	<p>Segregation</p>	<p>Private Discrimination; Lending Discrimination; Community Opposition;</p>	<p>&lt; 1 yr</p>	<p>Press release developed, PSAs developed, and related activities conducted</p>	<p>GNOFHAC, SLLS, Advocacy Center, OCD, HANO</p>	<p>In collaboration with HUD's Fair Housing Office, HANO hosted a series of outreach workshops.</p> <p>HANO worked with the City of New Orleans to develop a PSA to acknowledge the 50th Anniversary of the passing of the Fair Housing Act of 1968.</p> <p>In 2018, HANO began training with HUD on Reasonable Accommodations and continues internal trainings. LAFHAC will continue to do trainings for staff and public on FAIR Housing which we in 2024 and continue to do annually.</p>

<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education</b>	Launch a public awareness campaign to create broad based support	Segregation/ RECAP Disproportionate Housing	Private Discrimination; Lending Discrimination; Community Opposition;	1 - 3 yrs	1. Develop 2 PSA's on fair housing. Develop informational brochures on fair housing to distribute to landlords	HANO, GNOFHAC, OCD	Status of this item is reported above.
<b>and enforcement activities, in coordination and with fair housing organizations.</b>	for fair housing efforts by 2019.				citywide.3. Develop informational brochures to educate residents on their rights as renters.4. Develop informational brochures to educate prospective owners on their rights in the lending environment.		
<b>Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Expand the capacity of public call centers, and HCV Case workers, public agency front desk personnel including and 311 operators to provide information on resources to address.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition;	< 1 yr	Trainings conducted with public call center staff; resource guide provided to public agencies	GNOFHAC, SLLS, Advocacy Center, City of New Orleans Departments, HANO	HANO has trained all HCV caseworkers and operators to provide information on housing and mobility resources.

<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Create a public awareness campaign to ensure the majority of Section 8 voucher holders are aware that they can use their vouchers to become homeowner.</p>	<p>Disparity in Access to Opportunity;</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1 - 3 yrs</p>	<p>Increase the number of Section 8 homeownership closings by 10% annually through 2018</p>	<p>HANO</p>	<p>In January 2017, HANO had 274 Section 8 Homeownership closings. By 2018, the closings rose to 302, a 10% increase. Closings continue to rise as follows: 2019 – 324 (+7%) 2020 – 345 (+9%) 2021 - 369 (+7%) 2022 – 392 (+6%) 2023 – 410 (+5%) 2024 – 427 (4%)</p>
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<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Increase engagement among individuals who have significant challenges in accessing safe and affordable housing.</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1. &lt; 1 yr 2. 1 - 3 yr</p>	<p>1. Add HCV residents to existing resident advisory board or reconvene an HCV specific resident advisory board. Invite individuals with disabilities, prior criminal history, and LEP to participate in stakeholder workshops.</p>	<p>HANO</p>	<p>1. HANO assisted in the creation of an HCV Resident Advisory Board. 2. HANO established a Criminal Background Focus Group to provide input and assistance on tenets of the Agency’s current criminal background policy and screening procedures.</p>
<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in accessing safe and affordable housing including people with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>Review HANO’s reasonable accommodation process for HCVP and public housing tenants.</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1. ≤1 yr 1 - 3 yrs</p>	<p>1. HANO will provide updates to its reasonable accommodation process by 2017 to improve processes for HCVP and public housing tenants. HANO will offer bi-annual training to its employees in conjunction with this policy.</p>	<p>HANO</p>	<p>1. HANO updated its reasonable accommodation policies in the Admissions and Continued Occupancy Plan and the HCV Administrative Plan in 2017. Reasonable accommodation process was further updated according to HUD guidance in 2018.</p>
<p><b>Ensure that internal policies and practices advance access &amp; mobility for groups with significant challenges in</b></p>	<p>Ensure that all new HANO constructed units are built according to Section 504 accessibility standards.</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Admissions and occupancy policies and procedures in publicly supported housing Impediments to mobility</p>	<p>1. 1 - 3 yrs 1 - 3 yrs</p>	<p>1. Ensure that 5 - 15% of all new HANO constructed units are built according to Section 504 accessibility standards. Create incentives to</p>	<p>HANO</p>	<p>1. Since the November 2016 approval of the AFH Plan, HANO has constructed 759 units Of the total 759 units, 120(16%) are built according to the Section 504 accessibility</p>

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

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

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

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



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

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

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

<p><b>Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b></p>	<p>Develop and implement a strategic plan to address environmental hazards including lead, mold, toxic waste.</p>	<p>R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need</p>	<p>Location of environmental health hazards; Deteriorated and abandoned properties: Land use and zoning laws</p>	<p>&lt; 1 yr</p>	<p>1. Strategic Plan Developed  2. HANO continue annual HQS inspections for HCVP properties and annual HUD REAC inspections for Public Housing properties.</p>	<p>OCD, Code Enforcement, HANO, NORA, Health Department, Mayor's Office</p>	<p>HANO has updated its lead based paint policy in accordance with HUD guidelines. In the City's 2017-2021 Consolidated Plan, OCD will continue to use its lead-based policy of ensuring that every house that is rehabbed under its auspices is free from lead-based paint contamination.</p> <p>HANO completes HQS inspections for all new HCV units and on an annual basis for existing HCV and public housing units. HUD also inspects 20% of public housing units on an annual basis.</p>
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<p><b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b></p>	<p>Develop 400+ affordable rental units in gentrifying neighborhood of Tremé</p>	<p>Disproportionate Housing Needs Disparity in access to Opportunity</p>	<p>Displacement of residents due to economic pressures; Availability of affordable units in a range of sizes Location &amp; type of affordable housing</p>	<p>1. ≤1 yr 3 - 5 yrs</p>	<p>1. Complete 100 housing units at Faubourg Lafitte by 2017 2. Develop 300+ Iberville CNI off-site replacement units in Treme</p>	<p>HANO</p>	<p>1. HANO completed and leased 100 senior housing units at Faubourg Lafitte. HANO is developing 51 additional units, expected to be completed by 2026</p> <p>2. Through the Iberville CNI initiative, HANO has provided 535 offsite replacement units. Additional units will be developed as part of Winn Dixie Phase 2.</p>
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<p><b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b></p>	<p>Utilize HANO scattered sites inventory in gentrifying areas to develop affordable single family homes</p>	<p>Disproportionate Housing NeedsDisparity in access to Opportunity</p>	<p>Displacement of residents due to economic pressures; Availability of affordable units in a range of sizes; Location &amp; type of affordable housing</p>	<p>1 - 3 yrs</p>	<p>1. Develop 45 on-site homeownership units (1/3 affordable) at Faubourg Lafitte in gentrifying neighborhood of Treme by 2018.  2. Target development of 5+ affordable single family homes utilizing HANO's scattered sites in Treme  3. Target development of 5+ affordable single family homes utilizing HANO's vacant scattered sites in Carrollton.  4. Develop 5+ affordable single family homes utilizing HANO's vacant scattered sites inventory in Upper 9th Ward.  <i>(Actual number of homes developed dependent on financing and the housing market. Number of homes could be more or less than the target)</i></p>	<p>HANO</p>	<p>1. Project has been converted to rental due to unfavorable market conditions.  2. Under the Choice Neighborhoods Initiative, HANO, in partnership with the City of New Orleans and NORA, is in the pre-development phase of constructing 18 homeownership units in Tremé.  3. In the Carrollton area affordable homeowner units are being planned.  4. HANO plans to develop 5 affordable and 5 market rate homes in Bywater which is located in the 9<sup>th</sup> Ward.</p>
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<p><b>Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable homeownership and rental housing.</b></p>	<p>Protect the quantity and affordability of government-assisted rental properties.</p>	<p>Disproportionate Housing Need</p>	<p>Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures</p>	<p>1 - 3 yrs</p>	<p>Expanded Affordability Periods Implemented</p>	<p>OCD, NORA, HANO</p>	<p>HANO updated its policies to capture new regulatory provisions that allow for increased affordability periods of Project Based Voucher (PBV) contracts from a maximum of 15 years to 20 years; and further allowing for additional 20 year contract extensions if requested within 24 months of expiration.</p> <p>The Office of Community Development released a Request for Information (RFI) which prioritized developments that included long term and permanent affordability periods.</p>
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<p><b>Provide reliable, frequent, and affordable access to multiple transportation options to transit-dependent populations.</b></p>	<p>Better coordinate initiatives of housing agencies (OCD, HANO, NORA) and other departments (including Public Works, Parks and Parkways, ) and agencies (RTA, Sewerage and Water Board) to ensure that investments in gentrifying neighborhoods can be paired with affordable housing.</p>	<p>Disparity in Access to Opportunity</p>	<p>Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods</p>	<p>1 - 3 yrs</p>	<p>Refine and Revise Place Based Areas; Tracking and Reporting on all CDBG funding used for non-housing investments; Continue Geographically Limited NOFAs</p>	<p>HANO, OCD, NORA, RTA</p>	<p>HANO, OCD, and NORA collaborated with New Orleans Regional Transit Authority to develop a strategic mobility plan that included affordable housing near high frequency transit centers and in 2024 collaborated on a transit orient development pilot program grant.</p> <p>In September 2018, Orleans and Jefferson parishes reinstated the Regional Ride program, which allows residents in Orleans and Jefferson parishes to buy one pass to transfer between both the New Orleans Regional Transit Authority (RTA) and Jefferson Transit (JeT) lines for the first time in more than a decade. The program grants 24-hour access for \$6 without having to buy separate passes and provides the connectivity transit riders need.</p>
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## **Appendix**

### **ACOP**

Please click [here](#) to review the Admissions and Continued Occupancy Plan (ACOP) approved for October 1, 2024.

### **HCV ADMINISTRATIVE PLAN**

Please click [here](#) to review an excerpt of the redlined HCV Administrative Plan demoting proposed amendments for fiscal year beginning October 1, 2024.