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# ANNUAL PHA PLAN

Request for Amendment

Fiscal Year Beginning 10/1/2022



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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>10/1/2022</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>2,188</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>18,238</u></p> <p><b>Total Combined Units/Vouchers</b> <u>20,426</u></p> <p><b>PHA Plan Submission Type:</b> Annual Submission      <input checked="" 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>• Housing Communities: <ul style="list-style-type: none"> <li>○ Bienville Basin – 215 Treme St. &amp; 1201 Bienville St., New Orleans, LA 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>	<b>Annual Plan Elements</b>																																	
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 5%;">Y</th> <th style="text-align: left; width: 5%;">N</th> <th></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Statement of Housing Needs and Strategy for Addressing Housing Needs.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Financial Resources.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Rent Determination.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Operation and Management.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Informal Review and Hearing Procedures.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Homeownership Programs.</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Self Sufficiency Programs and Treatment of Income Changes from Welfare Program</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (<a href="#">24 CFR §903.7(r)(2)(i)</a>) (<i>see below</i>)</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan (<i>see below</i>)</td> </tr> </tbody> </table> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):  <b>See Below Operation and Management section.</b></p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>	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 type="checkbox"/>	<input type="checkbox"/>	Operation and Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Informal Review and Hearing Procedures.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Homeownership Programs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Self Sufficiency Programs and Treatment of Income Changes from Welfare Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ( <a href="#">24 CFR §903.7(r)(2)(i)</a> ) ( <i>see below</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan ( <i>see below</i> )
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**Operation and Management**

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

**HCV Administrative Plan Policy Changes**

HANO is requesting an amendment to the HUD approved Annual PHA Plan for fiscal year beginning October 1, 2022. HANO’s request is due to an update of occupancy standards for the Housing Choice Voucher Program.

**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.

## **DECONCENTRATION OF POVERTY AND INCOME-MIXING**

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

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

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

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

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

Deconcentration applies to transfer families as well as applicant families.

### **Step for Implementation**

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

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

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

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

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

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

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

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

### **Deconcentration Compliance**

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

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

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

Y N

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Hope VI or Choice Neighborhoods.   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Mixed Finance Modernization or Development.  |
| <input type="checkbox"/> | <input checked="" 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 Rental Assistance or Project-Based Vouchers 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.  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Non-Smoking Policies.  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Project-Based Vouchers.  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Units with Approved Vacancies for Modernization.   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

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

<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. <b>Provided in Approved Annual Plan for FYB October 1, 2022.</b></p>
<b>B.4</b>	<p><b>Capital Improvements.</b> See HUD Form 50075.2 approved by HUD on August 22, 2022.</p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N  <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <b>See below.</b></p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>



<p><b>C.4</b></p>	<p><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> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p><b>C.5</b></p>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y    N    N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>D.</b></p>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>
	<p><b>Provided in Approved Annual Plan for FYB October 1, 2022.</b></p>



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

**C.1 Resident Advisory Board (RAB) Comments**  
**Consultation Meeting on Amendment to PHA Plan – January 9, 2023**

Date	RAB Comments	HANO Response
1-09-23		
1-09-23		
1-09-23		
1-09-23		
1-09-23		

## **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.

**REPLACE WITH SIGNED CERTIFICATION**

### **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.*

**REPLACE WITH SIGNED CERTIFICATION**

**REPLACE WITH SIGNED CERTIFICATION**





## **C.4 CHALLENGED ELEMENTS**

### **Public Hearing Comments**

*A link will be provided to comments.*



## **Stakeholder Comments**

**REPLACE WITH COMMENTS**



## Appendix 1: Housing Choice Voucher Administrative Plan

(Excerpt of Revised Admin Plan)

### OCCUPANCY STANDARDS

#### OVERVIEW

Occupancy standards ensure that units are occupied by families of the appropriate size. Occupancy standards describe the methodology and factors HANO uses to determine the unit size for which a family qualifies and includes the identification of the minimum and maximum number of household members for each unit size. Units must meet the applicable HQS space requirements.

When a family is determined to be eligible for the Housing Choice Voucher Program (HCVP), HANO ensures that the family fully understands the way the program operates and the family’s obligations under the program through both an oral briefing and a briefing packet. Once the family is fully informed of the program’s requirements, HANO issues the family a voucher according to occupancy standards for the size of the family.

#### OCCUPANCY STANDARDS

##### Determining Family Unit (Voucher) Size

24 CFR 982.402

For each family, HANO determines the appropriate number of bedrooms under HANO subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

This table is a can be used as a guideline to assist staff with applying occupancy standards. This table must be used in conjunction with the narrative policies included in the Occupancy Guidelines portion of this Plan and HUD’s Maximum HQS Space Standards. For example a 4 person family consisting of a head of household, her 6 year old daughter and her 7 year old and 9 year old sons would not necessarily be provided with a 4 BR vouchers or a 2 BR Voucher as referenced in the table below. When the Occupancy Standards are factored in, this household would be eligible for a 3 BR voucher – one for the head of household, one for the daughter and one for the two sons.

<u>Number of Bedrooms</u>	<u>Min. Persons/Unit</u>	<u>Max. Persons/Unit</u>
0 BR	1	1
1 BR	1	2
2 BR	2	4
3 BR	3	6

4 BR	4	8
5 BR	5	10
6 BR	6	12

The following requirements apply when HANO determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.
- Generally, HANO will assign one bedroom for each two persons within the household, except for approved cases of reasonable accommodation or as approved through the guidelines listed below:

- Persons of the opposite gender (other than spouses, ~~and children under age 5~~) will be allocated separate bedrooms.
- ~~Same gender adults~~ Persons of the same gender of different generations may be allocated separate bedrooms. A generation is defined as 15-10 years.
- ~~Adults and children of the same gender (except for in the case of a parental or legal guardianship relationship) with an age gap of at least 25 years will be allocated separate bedrooms.~~
- ~~Parents and/or legal guardians will be required to share a bedroom with a child until the child is 5 years of age. Once a child reaches age five, the parent and/or legal guardian will be allocated a separate bedroom.~~
- ~~Children shall be assigned a separate bedroom at the age of five if they are of a different gender. Once a child reaches age five, they cannot share a room with a child of an opposite gender for occupancy standard purposes, regardless of the age of the other child.~~
- ~~Two children of the same gender share a bedroom.~~
- Single-person families will be allocated one bedroom.
- Live-in aides will be allocated a separate bedroom.
- No additional bedrooms shall be allocated for the family of a live-in aide.
- ~~A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.~~
- A family that consists of a pregnant person ~~(with no other persons)~~ will count the pregnant person as at least two people for determining the family unit size and into account the unborn child or children.

- ~~▪ Any live in aide (approved by HANO to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size~~
- ~~▪ Unless a live in aide resides with a family, the family unit size for any family consisting of a single person must be either a zero or one bedroom unit, as determined under HANO subsidy standards.~~

### **Exceptions to Occupancy Standards**

24 CFR 982.402(b)(8)

HANO may grant an exception to its established occupancy standards if HANO determines that the exception is justified by the age, sex, health, handicap, or relationship of family members or other personal circumstances. Reasons may include, but are not limited to:

- A need for an additional bedroom for medical equipment.
- A need for a separate bedroom for reasons related to a family member's disability, medical or health condition.

The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size, and must include appropriate documentation. Requests