



ANNUAL PHA PLAN

Request for Amendment

Fiscal Year Beginning 10/1/2022



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Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024						
<p>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.</p> <p>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 <u>do not</u> need to submit this form.</p> <p>Definitions.</p> <ol style="list-style-type: none"> (1) High-Performer PHA – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing. (2) Small PHA - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550. (3) Housing Choice Voucher (HCV) Only PHA - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing. (4) Standard PHA - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments. (5) Troubled PHA - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent. (6) Qualified PHA - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled. 								
A .	PHA Information.							
A.1	<p> PHA Name: <u>HOUSING AUTHORITY OF NEW ORLEANS</u> PHA Code: <u>LA001</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/1/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) *Number of Public Housing (PH) Units <u>2,188</u> Number of Housing Choice Vouchers (HCVs) <u>18,238</u> Total Combined Units/Vouchers <u>20,426</u> PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> HANO's draft plans and policy revisions are posted on the following platform </p> <ul style="list-style-type: none"> • Agency's website at www.hano.org • HANO Facebook page at https://www.facebook.com/HANOHOUSING HANO Facebook page at https://www.twitter.com/HANOHOUSING • HANO Constant Contact Email Group of Stakeholders • HANO Central Offices: 4100 Touro St. & 2051 Senate St., New Orleans, LA 70122 • Housing Communities: <ul style="list-style-type: none"> ○ Bienville Basin – 215 Treme St. & 1201 Bienville St., New Orleans, LA 70112 ○ Columbia Parc – 1400 Milton St. & 1401 Caton St., New Orleans, LA 70122 ○ Faubourg Lafitte – 2200 Lafitte St. & 700 N. Galvez St., New Orleans, LA 70119 ○ Fischer – 1915 L. B. Landry St., New Orleans, LA 70114 ○ New Florida – 2521 Independence St., New Orleans, LA 70117 ○ Guste – 1301 Simon Bolivar Ave., New Orleans, LA 70113 ○ City Square - 1501 St. Louis Street, New Orleans, LA 70112 ○ Harmony Oaks – 3320 Clara St., New Orleans, LA 70115 ○ Marrero Commons – 3353 Martin Luther King Jr. Blvd., New Orleans, LA 70125 ○ River Garden – 913 Felicity St. & 530 St. Andrew St., Ste. D, New Orleans, LA 70130 ○ The Estates – 3450 Desire Pkwy., New Orleans, LA 70126 <p> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 33%;">Participating PHAs</th> <th style="width: 33%;">PHA Code</th> <th style="width: 33%;">Program(s) in the Consortia</th> </tr> <tr> <td style="height: 30px; vertical-align: top;">Lead PHA:</td> <td></td> <td></td> </tr> </table>		Participating PHAs	PHA Code	Program(s) in the Consortia	Lead PHA:		
Participating PHAs	PHA Code	Program(s) in the Consortia						
Lead PHA:								

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes from Welfare Program</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)) (<i>see below</i>)</p> <p><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>)</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): See Below Operation and Management section.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>

Operation and Management

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

HCV Administrative Plan Policy Changes

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.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. Provided in Approved Annual Plan for FYB October 1, 2022.
B.4	Capital Improvements. See HUD Form 50075.2 approved by HUD on August 22, 2022.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (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. See below.
C.2	Certification by State or Local Officials. Form HUD 50077-SL , <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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. 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.

C.4	<p>Challenged Elements. 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>
C.5	<p>Troubled PHA.</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>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
	<p>Provided in Approved Annual Plan for FYB October 1, 2022.</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	If you provide additional bedrooms for an expectant mother, what happens when the mother loses the child?	The expectant mother must report any changes that creates a change in occupancy.
1-09-23	<p>Please do more education of tenants so they can understand their lease. Education should go beyond when tenants are admitted. Tenants should receive ongoing education.</p> <p>Video training when a tenant is admitted to HCV is not enough. A two-hour video loses people. Videos should be 20 minutes or less.</p> <p>At recertification, educate on top five changes that families should provide notice to HANO – move-out notice, income changes, changes to household size, and perhaps 2 more.</p>	HANO's Communication and HCVP departments are developing alternative modes of communication to help educate tenants, including online modules.
1-09-23	Please provide guidance on the rules for removing juveniles from lease when they are incarcerated, including guidance that addresses when a child's location is unknown.	Depending on the nature of the crime and evidence that HANO is able to gather, HANO may propose termination of the family's assistance, which would provide the right to an informal hearing. If the family member is absent from the unit for more than 90 consecutive days, the incarcerated juvenile will be removed. Verification will be obtained to document absence from the unit, incarceration, and of the crime itself. If a child's location is unknown, the Head of Household will have to provide a detailed self-certification of why their location is unknown and any efforts made to locate them.
1-09-23	Can a family be terminated from the program if a person in the household, even if a juvenile, is incarcerated?	In some circumstances, a family can be terminated from receiving subsidized housing if a family member is incarcerated.
1-09-23	Please provide education to live-in aides who live with HCV tenants. Often these aides believe that they should receive the tenant voucher when the original HCV tenant dies.	HANO does require that live-in aides sign a certification prior to being added to the household that details that they do not have any continued right to assistance if the participant dies.

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.

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

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

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

I, **Tyra Johnson Brown**, the **Director of Housing Policy & Community Development**
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years N/A and/or Annual PHA Plan for fiscal
year beginning **October 1, 2022** of the **Housing Authority of New Orleans** is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of New Orleans

Local Jurisdiction Name

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

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

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

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

Name of Authorized Official:

Tyra Johnson Brown

Title:

Director of Housing Policy & Community Development

Signature:

Date:

2/14/2023

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.

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.*

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

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

**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 ___ X ___ 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 ___ October 1, 2022 ___ 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
PHA Name

LA001
PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2022-2023 Amendment

5-Year PHA Plan for Fiscal Years 2022 - 2027

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

Evette Hester

Signature



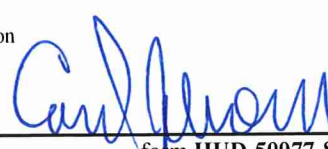
Date

3-1-23

Name Board Chairman

Carol Johnson

Signature



Date

2-23-23



C.4 CHALLENGED ELEMENTS

Public Hearing Comments

Please use the following link.

http://www.hano.org/news/PHA_Plan_1-30-23.mp3



No Stakeholder Comments were provided.



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) must be treated as a two person family~~ 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