



June 8<sup>th</sup> 2017

Ms. Shelly Smith  
Strategic Planning Director  
Housing Authority of New Orleans  
4100 Touro Street  
New Orleans, LA 70122

**Re: Housing Authority of New Orleans Agency Plans**

Ms. Smith,

The Greater New Orleans Housing Alliance (GNOHA) is a collaborative of non-profit housing builders and community development corporations working to rebuild the housing stock available in the city of New Orleans. The collaborative advocates for the preservation and production of affordable housing for people within the Greater New Orleans metropolitan region and places a special emphasis on the needs of the most vulnerable in society—seniors, people with disabilities, veterans, low-wage workers and low-income families.

GNOHA works closely with HousingNOLA and the implementation of the *HousingNOLA 10 Year Strategy and Implementation Plan*, which offers a road map to maximize the effectiveness of scarce government resources, increasing non-traditional resources, and assisting private investors in making strategic choices. *HousingNOLA* also offers a data framework to inform future housing policy, as well as shared leadership and engagement towards more thoughtful and scalable housing developments that are affordable for all income levels.

GNOHA's Policy Committee, along with HousingNOLA, seeks to work closely with HANO Staff and Board to achieve better housing policies and practices in the fiscal year to come. Below are our comments to the Housing Authority of New Orleans' Public Housing Agency Plans.

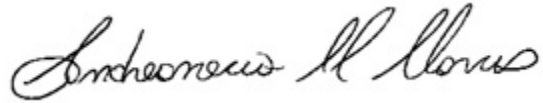
- 1. Deconcentration of Housing Choice Vouchers** We applaud HANO for its efforts in working with the City on its Assessment of Fair Housing Plan, and being the first jurisdiction to have its plan approved by HUD. The goals and priorities set out in the AFH Plan present a vision for addressing long-standing disparities in access to housing and housing standards among the citizens of New Orleans. We strongly support the stated priority to decrease the percentage of Housing Choice Vouchers (HCV) in racially/ethnically-concentrated areas of poverty (R/ECAPs) by taking steps to increase landlord participation and HCV tenant mobility.

A Shared Initiative, Inc.  
Alembic Community Development  
Alliance for Affordable Energy  
Asakura Robinson Company  
Broadmoor Improvement Association  
Committee for a Better New Orleans  
Crescent City Community Land Trust  
Desire Community Housing Corporation  
Dillard University  
Enterprise Community Partners  
Family Resources of New Orleans  
Finance Authority of New Orleans  
First NBC Bank  
Foundation for Louisiana  
GCR Inc.  
Global Green USA  
Greater New Orleans Foundation  
Green Coast Enterprises  
GNO Fair Housing Action Center  
Greater New Orleans, Inc.  
Gulf Coast Housing Partnership  
Harmony Neighborhood Development  
Home by Hand, Inc.  
Housing Authority of New Orleans  
Iberia Bank  
Iris Development  
Jane Place Neighborhood Sustainability Initiative  
Jefferson Community Action Programs  
Jericho Road Episcopal Housing Initiative  
Jerusalem Economic Development Corp.  
JPMorgan Chase Bank  
LA Association of Affordable Housing Providers  
Louisiana Appleseed  
Louisiana Association of Nonprofit Orgs.  
Louisiana Homebuyer Education Collaborative  
Louisiana Housing Alliance  
Louisiana Housing Corporation  
Lower 9th Ward Homeownership Association  
McCormack Baron Salazar  
Neighborhood Development Foundation  
Neighborhood Housing Services  
New Day Homeowner Services  
New Orleans Area Habitat for Humanity  
New Orleans Redevelopment Authority  
Northshore Housing Initiative  
Office of Housing Policy & Community Development  
Perez, APC  
Preservation Resource Center  
Project Homecoming  
Providence Community Housing  
Puentes New Orleans  
Rebuilding Together New Orleans  
Redmellon  
Renaissance Neighborhood Development Corporation  
Renaissance Property Group  
SBP  
Service Providers and Professionals Assoc.  
Spottswood CDC  
St. John the Baptist Housing Authority  
St. Roch Community Development Corporation  
Tulane/Canal Neighborhood Development Corporation  
Tulane City Center  
United Way of Southeast Louisiana  
University of New Orleans  
Urban Focus  
U.S. Department of Housing and Urban Development  
Volunteers of America  
Wells Fargo  
Whitney Bank

2. **Mobility Strategies** The recent reorganization of the Housing Choice Voucher Program (HCVP) Department provides the opportunity for HANO to tackle this priority with a renewed purpose. We are encouraged that the Housing Choice Voucher Administrative Plan includes the objectives of recruiting more landlords into the program outside of R/ECAPs and informing tenants on the benefits of living outside of R/ECAPs. We ask HANO to take more proactive steps in both of these areas and develop more robust plans and policies to achieve these goals. GNOHA should be considered a partner and resource in these efforts.
3. **Language Accessibility** The HousingNOLA plan emphasizes the importance that minority populations are fully able to access housing resources and programs. We ask that HANO be more proactive in making the HCVP and other programs more accessible for residents for non-English speaking residents. Particularly, Spanish and Vietnamese translations of important HANO documents is key to achieving this goal.
4. **Occupancy by Police Officers** Public Housing Admissions and Continued Occupancy Policy provides that HANO will allow Police Officers to occupy one unit in any public housing community at restricted rents even if the Police Officer does not meet the income limitations of the property. This policy makes sense for the stated goal of increasing security, however we are concerned about giving up a rent-restricted unit given the high demand for affordable units. Given that all New Orleans public housing properties are mixed-income and have market-rate units on site, there is an opportunity to work with property managers to reserve a market-rate unit at restricted rents for police officers instead of a public housing unit. This would allow HANO to address its goal of increased security without taking away an income-restricted affordable unit from an eligible low-income household.
5. **Energy Efficient Utility Allowance** We ask that HANO include a plan to implement an Energy Efficient Utility Allowance PILOT for the upcoming year. This program will reward owners of Housing Choice Voucher rentals that are built to a superior level of energy efficiency, thus encouraging efficiency measures that would lower utility bills for renters. GNOHA has been in talks with HANO staff around this initiative, and we are confident that it will be implemented, and should thus be included in the Annual Plan.
6. **Inspections** GNOHA supports Southeast Louisiana Legal Services' comments regarding more education around compliance with Housing Quality Standards between inspections. At tenant contract signings/annual income recertifications, HANO should provide documents that inform tenants of their right to request a special inspection at any time.
7. **Terminations and Grievances** We are concerned that Signature Communities' third party owners and managers are subject to standards less comprehensive than those for HANO-owned properties. Public housing tenants living in third party-managed sites should have the same protections as public housing tenants living in HANO owned sites. GNOHA supports SLLS's submitted recommendations to HANO on this issue.

If you have any further questions regarding GNOHA's comments, please do not hesitate to contact me at 504-244-8301 or at [amorris@gnoha.org](mailto:amorris@gnoha.org).

Sincerely,

A handwritten signature in black ink, reading "Andreanecia Morris". The signature is written in a cursive, flowing style.

Andreanecia Morris  
Chair/President, GNOHA Board of Governors  
Executive Director, HousingNOLA