



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lieutenant Governor ♦ Chrystal Komegay, Undersecretary

Public Housing Notice 2017-10

To: All Local Housing Authorities
From: Sarah Glassman, Associate Director, Division of Public Housing & Rental Assistance
Subject: Clarifications to PHN 2017-03 on Emergency Pull-Cord Notification Systems
Date: April 28, 2017

With this notice, DHCD is issuing clarification on [Public Housing Notice 2017-03](#), where DHCD recommended the decommissioning of Emergency Pull-Cord Notification Systems that **DO NOT** connect to an emergency response system. Please read the following responses to Frequently Asked Questions:

1) What if a resident doesn't want a pull-cord system removed?

ANSWER: To avoid this situation, DHCD recommends that LHAs remove/decommission at turnover only. That way the resident will never experience the "loss" of an amenity during their tenancy.

2) What if the Local Housing Authority (LHA) doesn't want to remove/decommission the system?

ANSWER: DHCD has recommended, but not required, the decommissioning of these systems. We understand that some systems work well for LHAs. If all of the housing units have functioning pull-cord systems that are able to simultaneously unlock doors, trigger an alarm bell, and turn on exterior lights, there is a value in keeping the system operational.

If the LHA is comfortable that the existing system is a good solution for their residents, then the LHA should continue to maintain it. However, these LHAs should ensure that all residents are aware of how the systems function so that there are no misunderstandings about what does/does not happen when they pull on the cord.

3) What is a "major modernization" project? And why did DHCD recommend decommissioning pull-cord systems at this time?

ANSWER: In this context, a major modernization project means substantially renovating all units such that residents must be relocated during construction. In other words, residents would be relocated from their “old units” and then return to fully-renovated ones where the pull cord system would no longer be in place. DHCD thought that this would present the most opportune time to decommission a system in total, across an entire development.

New pull-cord type emergency call systems should not be installed in new construction or in major modernization projects. As stated in [PHN 2017-03](#), the Office of Elderly Affairs recommends the use of a Personal Emergency Response System (PERS). For more information on PERS systems and their costs to residents, contact the local Aging Service Access Point Agency. Their webpage is:

<https://contactus.800ageinfo.com/FindAgency.aspx>

4) What is the technical process for safely decommissioning the pull-cord system?

If the system is interconnected to the Fire Alarm (FA) system, DHCD recommends that the LHA contact their FA service provider to determine how/what to disconnect, so as not to impact the FA system.

If the system is a standalone one, DHCD recommends:

- Disconnecting and removing the transformer and removing the pull-cord switch.
- Removing the light/bell associated with the system. Leaving the light/bell in place may cause future confusion among LHA staff, residents, or service providers who might mistake the system as still functioning. The light/bell can be removed and just capped and plated as required by code to the existing electrical box.
- The door strike does not have to be replaced.

5) What if an LHA finds out (via inspection or some other source) that a pull-cord system is not operating for one or more of the units in a building?

ANSWER: If the LHA would like to maintain the system, then they should implement a repair project. If the LHA is using capital funds, please submit a revision to the CIP and request DHCD Emergency Reserve funds if necessary. Once the system is functioning again, the LHA may either keep maintaining it or choose to decommission through a unit-by-unit process at turnover.

ANSWER: If the LHA would like to decommission the broken system at one or more of the housing units, then the LHA should educate the tenant(s) on how the system functions and, before decommissioning, get each tenant's permission in writing to remove the pull cord from his/her unit. However, if a tenant does not agree to its removal, then the LHA must make sure that the system functions for that unit and wait until the end of that tenant's tenancy to decommission.

6) What if an LHA moves to decommission a system and a tenant requests to keep it as a reasonable accommodation?

ANSWER: As with all reasonable accommodation requests, the LHA must consider the request on a case-by-case basis (see e.g., PHN 2009-11 and PHN 2011-13). The LHA does not have to offer to purchase a PERS if it chooses to grant the request to leave the pull-cord system in place. However, if the LHA decides to remove the system, it must still engage with the requester to determine an alternative accommodation that will meet the requester's needs, such as the PERS. As recommended in question 1 above, LHAs can avoid this situation entirely by following DHCD's recommendation to only decommission at unit turnover.

If you have any questions about this Notice, please contact Simone.Early@state.ma.us.