



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

Charles D. Baker, Governor ♦ Karyn E. Polito, Lieutenant Governor ♦ Jennifer D. Maddox, Undersecretary

**PHN 2020-20**

To: All Local Housing Authorities  
From: Ben Stone, Associate Director, Division of Public Housing  
Subject: Restricting Access to High-Risk Developments  
Date: April 28, 2020

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**Guidance on limiting access to senior high-rise and mid-rise developments to minimize the spread of the coronavirus.**

The coronavirus is extremely contagious and especially hazardous to seniors' health, and high-density developments – **especially mid-rise and high-rise senior developments with a single main entrance** – pose a particular risk for rapid spread of the virus among this vulnerable population. Reducing visitor traffic may lower, though by no means eliminate, the risk of COVID-19 transmission. Local Housing Authorities (LHAs) do not themselves have the legal authority to restrict people with a legitimate purpose, such as visiting a tenant, from accessing these developments, but Local Boards of Health have this authority, subject to the need to permit access to PCAs, caregivers and medical professionals. (See Attorney General Guidance: Rights of Disabled Persons to Accommodations During COVID-19 Crisis, at <https://www.mass.gov/doc/covid-19-disability-rights-guidance/download>).

DHCD recommends that LHAs seek to limit visitor access to these high-risk developments by taking the following steps in concert with their local Board of Health and public safety agencies. DHCD recognizes that some of these steps, especially the creation of and staffing of a sign-in desk, will be difficult for some LHAs to implement due to resource constraints and emphasizes that these are best practice recommendations, not directives. **DHCD recommends at minimum that LHAs with high-risk developments take steps one and two.**

1. Work with your local Board of Health (BoH) to obtain an order restricting visitors to those individuals providing essential services (food, medicine, home health aides, Personal Care Attendants (PCAs), etc.) See Attachment A: **EOEA Essential Workers** for guidance on essential care workers. You may request this order before a resident tests positive for COVID-19, but it is **up to the BoH** to determine whether to issue such an order. As an example, please see the attached order (Attachment B) received by the Malden Housing Authority.
2. Once the BoH issues an order, the LHA should post it at entryways and throughout the building, note it on the LHA's website, and widely circulate to residents, caregivers and others likely to visit. The LHA may also consider informing residents through robocalls, text, and social media. The LHA should also inform community partners and service providers as far as possible. LHAs should also work with local public safety, as their cooperation is needed make order enforceable.

3. Following the issuance of a BoH visitor restriction order, consider establishing a sign-in desk at the building entry during the hours receiving the most foot traffic (e.g., perhaps 8 a.m. to 8 p.m.). The desk may be staffed by some combination of the following:
  - a. Repurposed LHA staff (such as maintenance staff who have time freed up from deferral of routine in-unit work orders)
  - b. Properly vetted volunteers
  - c. Security guard through a reputable security company
  - d. Local Police detail

Some housing authorities have adopted a hybrid model, such as maintenance employees staffing desk during business hours and a security company staffing at night.

If the LHA decides to contract with a security company or pay for a police detail for some portion of this time, it must pay this cost through its operating budget or its Operating Reserve. If the Reserve goes below 35% of full reserve the LHA can request a budget exemption, which will be granted by DHCD for a limited period. This cost should be carried in budget line #4190 for “Admin Other”. The written justification therein can take the form of a brief email, and DHCD hereby temporarily waives the requirement that:

*“All persons who will perform LHA security functions, whether or not they will carry firearms, are graduates of a police academy certified by the Massachusetts Criminal Justice Training Council and have passed a standard psychological screening for law enforcement personnel. The security personnel will also need to participate in continuing education/training, and be recertified annually for firearms use, as appropriate.”*

...provided that this security guard is only staffing a front desk for purpose of restricting non-essential visitors. Additionally, LHAs with insufficient operating reserves may also include in their funding request the cost to erect temporary barriers to restrict entry if they do not already have a front desk.

Please note that DHCD will review the need for funding for front desk coverage on a regular basis, and budget exemptions will only be granted for the duration of the COVID-19 emergency.

4. The person at the desk should be equipped with at least a protective face covering per [CDC guidelines](#), or a surgical or construction face mask and gloves **if available**, or other PPE as recommended by local, state or federal health officials, and provided with a list of all the current building residents and their apartment numbers. Those entering the building should first be asked: 1) their name, 2) their phone number or other contact information, 3) the name of the resident they are visiting, and 4) to explain the purpose of their visit. The person at the desk should record this information, along with the date and time. Both the sign-in personnel and visitor should strive to maintain social distancing practices, remaining at least six feet apart.

Note that any security personnel who are not LHA employees must sign a personal information Holder agreement before gaining access to a list of building residents. See Attachment C: **Template Holder Agreement**. Note that this agreement is written for a contract with a security company, and will have to be edited if the LHA hires or engages volunteer building security on an individual basis.

5. The LHA’s and BoH’s visitor policy must allow essential visitors (including health care providers, PCAs, home health aides, other caregivers, as well as deliveries of food or medication) to continue accessing the development in safe manner. Whenever possible, work in advance with your local service providers and any other essential visitors to ensure they and their employees are doing all they can to provide services in a manner that minimizes risk of transmitting COVID-19. For example, if asking meals providers to leave food in building lobby LHA should arrange for these meals to be dropped off at the unit if the resident is too frail to easily get them from lobby. The board of health advisory may also direct that all essential visitors wear a face covering, per CDC guidance.

6. Social visitors or those unrelated to food, medication, or healthcare should be shown the BoH declaration and asked not to enter the building, but rather to communicate with the resident by phone or other means. The LHA should discuss with its BoH and local police how to handle those who ignore the request to leave and enter anyway. **Only authorized law enforcement personnel have the authority to compel compliance with the BoH order.**

**Other Considerations:**

- Particularly for these densely occupied, single entry buildings, where many residents and others circulate in and out, DHCD recommends that the LHA implement a strict cleaning protocol for all common areas of the building and frequent touchpoints, cleaning three times a day or as supplies and resources allow.
- If supplies are available, provide sanitizer, sanitizing wipes, and/or a handwashing station for essential visitors who need them before entering the building.
- For all sites, the LHA should post clear signage, in multiple languages where appropriate that discourages all non-essential visitors from entering the building or resident units.

These are best practice recommendations and DHCD understands that they may not all be possible for all housing authorities or feasible for certain sites, such as multi-building “campuses”. Some LHAs have found that they have gotten substantial compliance with a Local Board of Health order with signage and resident engagement alone.

Please contact your Housing Management Specialist with any questions.

Attachment A: **EOEA Essential Workers**

Attachment B: **Malden Board of Health Order**

Attachment C: **Template Holder Agreement**