



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

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

PHN 2020-23

To: All Local Housing Authority (LHA) Executive Directors
From: Ben Stone, Associate Director, Division of Public Housing
Re: Reopening Guidance for Local Housing Authorities
Date: June 22, 2020

WHAT YOU NEED TO KNOW NOW – KEY POINTS:

1. Phased Reopening Process
2. LHAs do NOT need to change any COVID-19 related restrictions at this time
3. DHCD does not recommend resuming inspections or routine in-unit maintenance until at least Phase III
4. New guidance allowing for capital projects in interior space but outside of units
5. No change to tenant selection and lease-up policy
6. LHAs must comply with occupancy restrictions for offices by July 1, but no requirement to return to offices or open to public if LHA can perform essential functions remotely
7. No recommended changes to visitor restrictions
8. No required change to resident services at this time, with recommendation to consider how to safely resume in-person service provision in Phase III.

Governor Baker issued the [Reopening Massachusetts](#) report on May 18. The report and [associated guidance](#) detail a data-driven, four-phase plan to slowly resume normal activities. Phase I began May 18th with manufacturing, construction, and places of worship allowed to open with proper safety practices. Phase II began June 8, with more activities allowed including retail, amateur sports, childcare, and outdoor dining with safety protocols. Movement through each stage from Phase I: “Start” to Phase 4: “New Normal” will be guided by data on progress suppressing COVID-19, and each phase will last a minimum of three weeks.

This guidance is meant to clarify how the Governor’s guidance relates to Local Housing Authorities, and to offer a first framework for thinking about how LHAs may resume in-person activities in a safe manner over the coming months. We recognize that LHAs have varying circumstances, and will have to take into account their staffing, budget and building configurations as they stay within the framework of the Reopening Massachusetts guidance.

In general, through at least Phase II, LHAs should continue with their current operational practices to reduce the spread of COVID-19. The Governor’s guidance and this notice do **NOT** require LHAs to lift any COVID-19 related restrictions, and LHAs should remember that the Governor’s advisory still recommends that those who are over 65 or otherwise at risk continue to shelter at home as far as possible. DHCD recommends that LHAs err on the side of caution, particularly for vulnerable populations, as they decide how to resume activities alongside the Commonwealth’s phased approach to reopening. LHAs should approach the Governor’s guidelines as a ceiling, rather than a floor, on resuming normal activities.

Please be mindful of Local Board of Health (LBOH) advisories, which may be more restrictive than state guidance.

We will amend this guidance as the state moves through the reopening phases; we may issue another notice as Commonwealth moves towards Phase III. Please refer to the [Reopening Massachusetts](#) website for more details; the state frequently updates the website with more sector guidance.

Reopening Summary

Phase I “Start” Summary: May 18-June 7

- Construction, Manufacturing, and Places of Worship, and non-emergency Hospital and Health care services, allowed to operate with restrictions. *DHCD now recommends LHAs allow construction projects to proceed in a wider range of interior spaces, but not yet in occupied units.*
- Office space allowed to operate with restrictions, including 25% capacity limit on office occupancy. Essential Businesses (including LHAs) that have been operating as “COVID-19 Essential Service” as of May 18, 2020 have until July 1, 2020 to comply with the occupancy limitations. LHAs are required to have [COVID-19 control plan](#) and [compliance attestation poster](#) on premises. *DO NOT NEED TO SUBMIT TO DHCD or other state agency. DHCD does not require LHAs to return staff to office if they can maintain essential function remotely, but will offer design recommendations for reconfiguring offices to comply with safety protocols.*
- Public advised to stay at home as much as possible, gatherings limited to fewer than ten persons. People over age 65 or with underlying health conditions advised to only leave home for essential errands. LHAs should continue to limit indoor gatherings and continue to work with ASAPs and other local agencies to enable elderly/disabled residents to shelter at home as much as possible.
-

Phase II “Cautious” Summary: June 8-To Be Determined

- Additional sectors allowed to reopen with restrictions, including in-person retail, [restaurants](#), [lodgings](#), and personal care.
- More outdoor recreation including athletic courts allowed, with restrictions. LHAs may implement these changes for outdoor recreation spaces on their developments.

Phase III “Vigilant” Summary: Dates to be Determined

- High Risk populations advised to work from home
- All businesses allowed to open except for nightclubs, bars, and large venues

Phase IV “New Normal” Summary: Dates to be Determined

- All activities may resume, maintaining social distancing and hygiene practices

In general, we suggest LHAs proceed cautiously and as a rule of thumb open up activities roughly a phase slower than the state as a whole.

LHA Operations

LHAs should implement all of the [COVID -19 Specific Standards for Sectors Not Otherwise Addressed](#).

LHAs, along with all other active businesses, must meet mandatory safety standards including:

- Ensure six feet of separation between workers/residents wherever possible;
- Require face coverings for workers;

- Post visible signage reminding workers and residents of safety protocols;
- Train workers on social distancing, hygiene, and self-screening;
- Provide access to handwashing facilities and cleaning products.

See below on specific guidance for LHA operations:

1. Maintenance (See [Public Housing Notice 2020-11 for details](#)) – **No changes in maintenance operations during Phase I or II**

- LHAs **MUST** continue to service emergency work orders using proper precautions.
 - Emergencies should be narrowly defined as only those conditions that are immediately threatening to the life or safety of residents, staff, or structures. If a deficiency meets this definition any time of day, LHA must identify it as an emergency. See [PHN 2020-11 Section 3a](#) for list of qualifying emergencies.
 - As stated in an email to LHAs on June 5th, installing air-conditioning units should be considered emergency work orders as they impact the health and safety of residents. DHCD recommends LHA coordinates the installation by contractors or LHA maintenance staff rather than ad-hoc installation by friends and family.
 - Maintenance staff should only enter occupied units to address **emergency health and safety issues** should ask health-screening questions of residents prior to staff entering.
 - Please be reminded that, according to the [March 18th order](#) of the Commissioner of Public Health regarding the sharing of critical information with first responders, LHAs may not request from Local Boards of Health the addresses of individuals who have tested positive residing within public housing.
- LHAs **should** regularly clean and sanitize frequently touched points in common areas. (e.g., doors, handrails, bathroom surfaces and handles, counters, elevator buttons, etc.), at least two times per day, if possible.
- To avoid all maintenance staff being quarantined or sick at the same time, LHAs may consider rotating staff IF the LHA has sufficient maintenance staff.
- LHAs may reprioritize maintenance staff to exterior work, vacant unit turnovers, maintenance of building systems, and sanitizing common areas.
- DHCD is **NOT** advising the resumption of unit inspections or non-emergency work orders at this time in occupied units. LHAs may consider **resuming** this work in occupied units in family developments in **Phase III** and in 667 elderly/handicapped developments in **Phase IV**. LHAs should be conscious that residents of family housing may also have risk factors for COVID-19 and should proceed cautiously when going back into units. Maintenance staff should follow safety protocols, including:
 - Wearing masks while in occupied units, common areas, or otherwise likely to encounter residents or other staff;
 - Opening windows to improve airflow;
 - Requesting residents stay in separate room or outside unit throughout work;

- Sanitizing surfaces touched;
- Applicable measures from the [State's workplace safety standards for construction](#).
- If needed, please contact your Facility Management Specialist (FMS) for help prioritizing and addressing deferred work orders.
- DHCD will issue further guidance on resuming annual inspections and will likely recommend LHAs resume them in Phase IV. Similarly, FMS may resume annual unit inspections associated with Performance Management Review in Phase IV.

2. Construction – Projects with limited interior access now allowed

As a part of the Phase I reopening, the State issued various sector specific safety standards on May 18th. Capital projects that move forward should adhere to the [State's workplace safety standards for construction](#). Please see DHCD's additional guidance below, which adjusts the [guidance on capital projects](#) put out on March 19:

- Except in event of emergency, continue to restrict both construction work and design consultant site visits in occupied units. Matching our above guidance on maintenance, DHCD recommends deferring capital projects in occupied units until Phase IV.
- All construction in progress shall meet or exceed the [State's workplace safety standards for construction](#). An addendum to all projects, currently out to bid or approved to bid, will be issued automatically through Bid docs and Project Doc which includes these safety standards as a part of the contract. Existing construction projects may experience change orders due to these standards.
- We continue to recommend that LHAs prioritize and permit exterior projects and those in unoccupied interior spaces that are directly accessible from the exterior, at the discretion of all parties.
- In addition, we **now recommend proceeding with projects which involve:** mechanical rooms, roofs, elevator repairs, exterior door projects and vacant unit rehabs that are not accessible from the exterior and may be accessed without resident interaction through common areas with the use of temporary partitions and a coordinated effort between the contractor/design consultant and the LHA. Please note LHAs should give special attention to cleaning and sanitizing these areas after workers have moved through them and take care to notify residents so that they avoid the affected areas. Work should take place at the discretion of the LHA and contractor.
- In all instances, DHCD will defer to the LHA's comfort level before moving forward with any project type. If the LHA wishes to continue holding off on all interior construction projects for the time being, DHCD will support that decision.

3. Tenant Selection and Move-ins – See PHN 2020-11 and Memorandum dated May 27, 2020 on c. 667 Lease Up Policy (Attachment A) for procedures in Phase I or II.

LHAs will continue to accept CHAMP applications on-line and in paper. The process for completing tenant selection resulting in unit lease-up should continue to follow the procedures outlined in [PHN 2020-](#)

[11, Section 6](#) and will remain in effect until at LEAST Phase III. All work should be done while practicing social distancing and CDC protocols.

- Effective June 1, 2020 DHCD notified LHAs that we are ending our policy allowing LHAs to temporarily suspend lease ups for any c.667 units. Please refer to emailed Memorandum dated May 27, 2020 on c. 667 Lease Up Policy.
- LHAs cannot hold a unit vacant for an applicant that has stated they do not want to move at this time due to COVID-19. In recognition of the concerns of some applicants regarding moving at this time, applicants can refuse a unit offer and remain on the LHA's waiting list, designated as Good Cause Refusal. The applicant will not lose their original time stamp or their priority/preference. Please refer to Memorandum dated May 27, 2020 on c. 667 Lease Up Policy.
- LHAs may continue to defer lease ups in Congregate Housing, due to the challenge of maintaining social distancing in these settings.
- DHCD recognizes that move-ins in high rise and other common entrance buildings may present safety challenges for the new resident, current residents, and LHA staff. If an LHA does not think a move-in can be done in a safe manner, they may request waivers to temporarily defer lease-ups in high rises and other common entrance buildings until the LHA has a safe move-in protocol plan in place. DHCD will review such waiver requests on a case-by-case basis.
- LHAs should administer lease-ups with consideration of social distancing and the safety of applicants and staff following CDC and DPH protocols. Below are best practices for moving-in new residents to buildings with common entrances, hallways, and elevators as included in the May 27 2020 memorandum:
 - Restricting move-in to specific times, and notifying residents to stay in their units while move-in is occurring;
 - Utilize LHA staff for coordination and oversight of move-in;
 - Restricting number of people who can help the new resident move-in;
 - Requiring and providing masks and gloves for those helping new resident move-in;
 - Hiring professional moving companies.
- LHAs should put in place similar safety protocols for move-outs as well.

4. Office Practices – **Adhere to Safety Standards, no Requirement to Return to office**

The Governor's Phase I reopening guidance allows non-essential offices to reopen if they adhere to safety protocols and occupancy limits. Organizations that have operated as essential services throughout the pandemic, including LHAs, are also subject to these safety protocols and occupancy limits. They have until July 1 to comply with occupancy limits but must comply with other applicable standards and protocols immediately. LHAs do NOT need to bring workers back into office or open to public yet so long as they can continue to perform essential functions.

- If an LHA has had staff in office, the LHA must comply [with SECTOR SPECIFIC WORKPLACE SPECIFIC SAFETY STANDARDS FOR OFFICE SPACES TO ADDRESS COVID-19](#).

- By July 1, comply with 25% occupancy limit. Under Sector Specific Workplace Specific Safety Standards, may exceed based on demonstrated need, which in turn must be based on public health or public safety considerations or where strict compliance may interfere with the continued delivery of critical services.
 - Limit meeting sizes, 6 feet of distance between individuals, minimize shared use of confined spaces like elevators.
 - Hand washing available, at least daily cleaning of office space
 - Workers should continue to telework if feasible; external meetings should be remote to reduce density in the office.
- Post [COVID-19 compliance plan](#) and [attestation publicly](#). LHAs do NOT need to submit them to DHCD or another state agency, but must have them posted on premises.
 - Start thinking about how you might reconfigure offices as people come back in and you open to public in future phases – (added space, Plexiglas partitions, hand washing stations, etc.). LHAs may add small capital projects for office renovations to comply with safety protocols through a revision to their CIP. DHCD will develop generic design guidelines for these projects.
 - **REMINDER – NO ABSOLUTE REQUIREMENT TO RETURN TO OFFICE OR OPEN OFFICE TO THE PUBLIC** at this time. As long as LHA can perform essential functions remotely (payments, rent collection, available to residents, payroll, emergency maintenance, tenant selection, and lease ups), it may elect to do so.
 - DHCD recommends waiting until at least Phase III before opening offices to the public as long as an LHA can perform its essential functions remotely.

5. Visitor Policies – Adjust Current Restrictions to Encourage Outdoor Visits

DHCD recommends that LHAs work with their LBOH to ease any current visitor restrictions for elderly/handicapped housing to reflect [Health and Human Services guidance](#) on visitation in congregation settings. While LHAs in general will not have the staffing resources to put in place all the screening measures in the HHS guidance, DHCD recommends adjusting these visitor policies to facilitate outdoor, socially distanced visits with face coverings strongly encouraged. As always, LHAs should work with their Local Boards of Health on enforcing and updating these policies. DHCD will further revisit recommendations policies as the state approaches Phases III and IV. Please refer to [PHN 2020-20](#) for best practices on visitor policies.

6. Resident Services - No Change in Phase I & II

In Phase I & II DHCD recommends no change to providing resident services. Programs should continue to be offered remotely and LHAs should continue to call residents regularly and offer support to them to meet immediate needs and try to address issues of social isolation.

- LHAs and service providers should start planning for how to safely provide in-person services in future phases.
 - LHAs should consider how to alter the outside spaces to encourage social distancing while outside. This can include marking off spaces that are six feet apart, removing seating that is too close together, and identifying places to hang signs reminding people to wear masks

while outside. While the Phase I & II guidelines allow for gatherings of up to ten people, given the high-risk population we suggest that LHAs continue to discourage indoor gatherings while making outdoor spaces available for social distancing. Similarly, the Executive Office of Health and Human Services recommends deferring many in-person social services until Phase III, with various safety recommendations ([EOHHS Reopening Approach, pages 13 &14](#)).

- For LHAs with small offices, consider offering community room space for one-on-one tenant meetings. If the development is a supportive housing site, consider working with your Elder Services provider to find alternative sites such as community rooms for their resident meetings that allow for social distancing.
 - In general, DHCD does not recommend opening community rooms to general use until at least Phase III.
-
- LHAs should continue to encourage social distancing, mask wearing, and hand washing through signage and other communications to resident.
 - Hair Salons were [allowed to open with restrictions](#) as of May 25. If your c.667 housing development has a hair salon on the premises, please read the reopening guidelines and call your housing management specialist to discuss if the salon will be able to safely operate in compliance with Commonwealth guidance.

Please contact your DHCD Housing Management Specialist or Project Manager with any questions.