



Commonwealth of Massachusetts

DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

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

PHN 2020-33

To: All Local Housing Authority (LHA) Executive Directors
From: Ben Stone, Associate Director, Division of Public Housing
Date: October 19, 2020
Subject: COVID-19 Response: Updated Recommendations

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Background:

The COVID-19 situation continues to evolve both nationwide and in Massachusetts. While Massachusetts continues to reopen on a community-by-community basis, overall COVID-19 case counts are increasing both nationally and in the Commonwealth. DHCD is publishing this guidance as an update to [PHN 2020-27](#) to make recommendation as to how LHAs should maintain, expand, or rollback “normal” activities given the level of community spread.

These recommendations are meant to give LHAs an updated framework as to decisions about whether to resume or defer inspections, continue routine in-unit maintenance, or open community rooms; this guidance gives ultimate discretion as to how to implement these recommendations to LHAs who know their communities and residents best.

1. Community-Based Reopening vs. Rollback Guidance

On October 5, 2020, the Baker-Polito administration [announced](#) that lower risk communities could enter Step II of Phase III of the Commonwealth’s Reopening Plan. Step II Communities may allow limited indoor performances and indoor recreational activities at up to 50% capacity, and may also permit outdoor gatherings of up to 100 people at event venues and in public settings as compared to 50 people for Step I communities. The announcement and [executive order](#) define lower risk communities as those which have had fewer than 8 average daily cases per 100,000 residents for at least three consecutive 14-day measurement periods.

The Commonwealth maintains the [COVID-19 Community-Level Data Map](#), updated on afternoons. This map shows each community’s case level calculated over the most recent 2 -week period and designates them into 3 risk categories: higher risk (red, >8 average daily cases/100,000), moderate risk (yellow, 4-8 average daily cases/100,000), or lower risk (green (<4 average daily cases /100,000). Communities with fewer than 5 total cases over the two weeks are not given a designation. DHCD recommends LHAs use the map to guide decisions when and whether to implement the reopening measures in PHN 2020-27.

LHAs should refer to the below matrix to guide operations, but DHCD emphasizes these are only recommendations and the decisions to rollback or continue reopening for each operational area are at local discretion.

Activity	Lower Risk or Blank	Moderate Risk	Higher Risk	Reference
Unit Inspections	Continue	Continue activities as in Lower-Risk zone but re-evaluate safety practices and communication to residents; prepare to roll-back reopening if community moves into Higher Risk zone.	Pause	PHN 2020-27 Section 1) and Addendum #1
Non-Emergency In-Unit Maintenance	Continue		Pause	PHN 2020-27 Section 1)
In-Unit Construction	Continue		Continue if Construction Contract; Consider Delaying NTP. In-Unit Design work may continue with appropriate protocols.	PHN 2020-27 Section 2)
Offices Open to Public	Continue if office reconfigured for COVID-19 safety. Offices not required to open to public		Pause	PHN 2020-27 Section 4); PHN 2020-24
Visitor Restrictions	No		Consider re-implementing for 667 Developments (with Local Board of Health Order)	PHN 2020-27 Section 5); PHN 2020-20
Community Rooms	May open with restrictions (not required)		Close	PHN 2020-27 Section 6)
Congregate Resident Services (ie meals)	Resume with appropriate restrictions		Pause	PHN 2020-27 Section 6)
Board and Resident Meetings	Hold Remotely, Outside, or in large well-Ventilated Room		Hold Remotely	PHN 2020-27 Section 7

Regarding inspections, some residents may refuse inspections or other necessary entries to unit because of COVID-19 concerns even if LHA is not in high-risk community. In this event please contact your Regional attorney and/or Housing Management Specialist/Facilities Management Specialist for guidance based on the specific circumstances.

2. Reminder on COVID-19 Basics

In general, LHAs have done a great job implementing measures to protect their residents during this COVID-19 pandemic, including providing masks and encouraging mask wearing; cleaning frequently; encouraging social distancing; and at the height of the pandemic deferring in unit work and at times enacting visitor restrictions.

Even in “green” communities, LHAs should continue all COVID-19 safety practices as described [in PHN 2020-27](#). These include but are not limited to:

- universal mask wearing by staff whenever there is a possibility of encountering other staff, residents, or vendors;
- Frequent cleaning of common areas

- Enhanced safety protocols whenever maintenance or contractor goes in unit (see PHN 2020-27,³ Sections 1 & 2)
- Signage **strongly encouraging** mask-wearing and social distancing by residents. Signage should be prominent in LHA common areas.

DHCD reminds LHAs that they may use Coronavirus Relief Funds disbursed pursuant to [PHN 2020-29](#) for a variety of COVID-19 response activities, including signage, stockpiling PPE and cleaning supplies, specialized cleaning contractors, and staff time (both regular and overtime) devoted to COVID-19 response rather than regular duties.

3. Aerosolized Transmission

On October 5th the CDC [released updated guidance](#) that COVID-19 can be spread by airborne transmission, as well as by respiratory droplets. This notice also highlighted that contaminated surfaces are a relatively insignificant transmission vector. This follows on warnings by public health experts about aerosolized transmission, and highlights the danger of indoor gatherings and previous guidance from DHCD on the importance of ventilation. With aerosolized transmission, standing six feet apart, wearing masks, and to a lesser extent, plexiglass barriers can dramatically reduce risk of transmission but may not eliminate it.

If LHAs are opening community rooms to residents and offices to staff and or residents, they should focus on ensuring good ventilation through opening doors or windows if weather allows, ensuring HVAC systems bring in outside air and have upgraded filters, and if these measures are not sufficient, purchasing [portable air cleaners](#) if appropriate. These will not be helpful in all cases so please work with your Facilities Management Specialist or Construction Advisor if considering it. LHAs should utilize improved ventilation in addition to mask-wearing and social distancing, not as a substitute.

Resources on Ventilation and HVAC

- American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE), [Filtration and Disinfection FAQ](#)
- American Institute of Architects (AIA): [Strategies for Safer Multi-Family Housing](#)
- American Institute of Architects (AIA): [Strategies for Safer Offices](#)
- American Institute of Architects (AIA): [Re-occupancy Assessment Tool V3.0](#)

4. Flu-Shots

Widespread flu vaccination will be critical this fall and winter to avoid overwhelming health care providers with both COVID-19 and flu patients. This is especially important for vulnerable populations, particularly seniors.

DHCD **strongly** encourages LHAs to remind their residents to obtain a flu vaccine, unless recommended otherwise by a healthcare professional. LHAs may not require flu shots as a condition of tenancy.

Massachusetts *does* require flu shots for children in childcare/preschool, grades kindergarten – 12, and postsecondary institutions.¹ 4

To help expand vaccination among the high risk population of low-income seniors, DHCD and DPH established the following procedure:

1. Local Housing Authorities should first reach out to their **local board of health (LBOH)**² to identify whether the LBOH can visit c.667, c.167/689, and/or federally-funded elderly developments to vaccinate or otherwise facilitate vaccination. LBOH have been notified to expect contact from housing authorities.
2. If facilities cannot secure vaccination through the LBOH, LHAs should contact **MA Department of Public Health (DPH)** staff Shumethia Seal (617-983-6810) or Rattana Bip (617-983-6818), explain the response from the LBOH, describe the size and population served at the development(s), and request that a DPH mobile vaccination team visit the site. DPH vaccinations would occur in November.

Additionally, LHAs should remind residents that MassHealth plans cover no-cost flu shots.

¹ For additional information, see: <https://www.mass.gov/info-details/school-immunizations#:~:text=get%20recommended%20vaccines,-.School%20immunization%20data,in%20communities%20across%20the%20state.>

² See the list of local boards of health: <https://mhoa.com/municipal-links/>