



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

Charles D. Baker, Governor ◆ Karyn E. Polito, Lt. Governor ◆ Jennifer D. Maddox, Undersecretary

Memorandum

To: Regional Administering Agencies
From: Brendan Goodwin, Director, Division of Rental Assistance
Re: COVID-19 (“Coronavirus”) Emergency Planning
Date: March 11, 2020

We understand that Regional Administering Agencies (RAAs) management, staff, and residents have serious concerns around the COVID-19 novel Coronavirus. There is a lot of information publicly available related to preventative measures, hygiene and contingency planning for the potential spread of the virus. DHCD has been working closely with its partners at the Department of Public Health (DPH) and refers to DPH’s website <https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19> for information and updates related to the virus.

DHCD has received a number of questions from RAAs and other partners and is issuing this memo to provide guidance around planning for the continuity of administration of Rental Assistance Programs.

The health and safety of your staff, program participants and constituents is of utmost importance. DHCD expects that RAAs have current or are currently updating their Continuity of Operations Plan (COOP) for situations such as these. We defer to each RAA to make decisions that will impact program operations in accordance with their own plans and fully accounting for mitigating impacts to program participants to the best of your ability.

We do ask that the RAAs keep in regular communication with DHCD on what plans they are implementing (more guidance below).

Rental Assistance Programs (HCVP, MRVP, AHVP, DMH-RSP)

The most critical function of rental assistance is continued subsidy payments to landlords on behalf of the 35,000 households who depend on our rental assistance programs. DHCD expects that there will be no impact on this program function and is planning to ensure continued payments from DHCD to our Administering Agencies. If RAAs are planning to reduce their workforce or allow telecommuting, it is expected that payments will continue to be processed throughout this emergency situation.

We also understand that you may have large group briefings for voucher issuance scheduled that you may decide to postpone, cancel or conduct virtually. If you decide to limit or ban walk-in appointments, please ensure that alternative formats are planned for (mail, email, etc.) and that the changes are fully communicated to applicants, participants and landlords, as applicable.

We have heard concerns about scheduled inspections on DHCD's federal portfolio units. DHCD will allow RAAs to make decisions as to whether to limit or suspend inspections. Please review scheduled emergency inspections on a case-by-case basis in order to make a safe decision for the tenant. Keep in mind that many of our HCVP tenants are elderly and/or may have underlying health conditions. Inspectors who are feeling sick should absolutely not be performing inspections and RAAs may want to ensure that tenants are not sick before entering units for scheduled inspections. Again, if inspections are suspended or limited, please ensure proper communication is made with tenants and landlords.

DHCD will approve remote or mail recertifications for its rental assistance programs to limit the amount of foot traffic in your offices, if the RAA chooses to implement this policy. Again, communication to tenants is critical (especially if appointments have already been scheduled).

Housing Consumer Education Centers (HCEC)

The HCEC program requires agencies to have regular, available "walk-in" hours for clients. With the understanding that housing emergencies are not suspended (and may be exacerbated) during this emergency, DHCD will allow HCECs to limit or suspend walk-in appointments for a limited time, so long as viable, alternative forms of assistance are made available to HCEC clients. Any suspension of walk-in appointments must be limited to as long as is necessary to ensure the safety of your staff and HCECs need to clearly communicate the ways in which they can be reached (including updating websites, voicemail messages and posting notices at offices).

Planning and Reporting on COVID-19 Mitigation Actions

Note: We have not received any formal guidance from HUD related to the HCVP. DHCD did reach out to HUD Regional to ask about whether there would be leniency for any PIC deficiencies or errors that may result from delayed recertifications, suspended inspections, etc. We did receive a response that if an emergency prevents us from performing certain duties, we can ultimately ask HUD for a waiver. Whenever possible, RAAs should try to maintain current on all reporting requirements to HUD.

DHCD is requesting that any RAA or HCEC that intends to implement mitigation procedures, policies or actions submit a plan to DHCD. This plan is not for DHCD to approve or disapprove, rather we need to understand the full implications these plans may have on the households we serve.

As you prepare and implement your plans of actions or if plans change, please email Karlene Maiolino, Assistant Director of Federal Programs, karlene.maiolino@mass.gov with the following:

- A narrative of emergency actions the RAA is taking
- Programs that will be affected and an estimated duration of the emergency action
- Potential Implications for Program Compliance (late re-exams, late HQS, etc.)
- Alternative arrangements being put in place
- Communication plan for action
- If a telecommuting policy is being proposed, please include personal home/cell phones for all Senior staff that will not be performing their duties in the office

DHCD will review RAA plans and may reach out with additional questions. As you are aware, this is a fluid situation. We do expect to be reaching out again with additional guidance as it becomes available to us. Should you have any questions regarding this request or potential actions, please reach out to myself or Karlene. We suggest reaching out by email so that we can compile questions and answers and keep all RAAs updated. You may reach us at brendan.goodwin@mass.gov or karlene.maiolino@mass.gov.