COVID-19 Transition Plan

From Shelter in Place to Full Opening

Continuing Operations Guide

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Springfield Housing Authority
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COVID-19 Impact on SHA Operations

On March 16, 2020, the Springfield Housing Authority (SHA) closed its offices to the public through March 30, 2020; however, remained open for business to assist families with the provisions of administering Public Housing and the Housing Choice Voucher program. In accordance with Executive Order 2020-18 issued by Governor Pritzker on March 20, 2020 and relative to the unprecedented COVID-19 pandemic facing the United States, on March 23, 2020, the SHA extended its closure to the public and continued to operate as an essential business through April 30, 2020.

“…while there may be a COVID-19 crisis, the housing crisis for families in poverty continue to exist. The SHA has 3,000 families counting on us.” ~Director Newman

On April 16, 2020, the President of the United States issued “Federal Guidelines to Opening Up America Again” which involves 3 phases of opening up for individuals, employers and specific types of employers.

On April 23, 2020, Governor Pritzker announced that he would extend the Shelter in Place order through May 30, 2020 in the public health interest of the citizens of the State of Illinois.

Following is the Springfield Housing Authority’s transition plan and timeline as a continuing operations guide to move from “closed to the public operations” to fully re-opening to the public, including the SHA’s election of U. S. Department of Housing and Urban Development regulatory waivers issued via PIH Notice 2020-05 on April 10, 2020 and PIH Notice 2020-13 on July 2, 2020. Waivers elected by the SHA and included in this plan shall take effect from April 10, 2020 through the stated period as allowed through PIH Notices 2020-05 and 2020-13.
ADMINISTRATIVE/HUMAN RESOURCES

Effective March 16, 2020, the SHA offices closed to the public and issued the following protocol regarding any imminent situations that directly affects the work environment:

- Closing the affected area of operation for a period of time;
- Cleaning / sanitizing the affected area;
- Notifying those who may be affected by the imminent situation; and
- Following the guidance of the CDC, IDPH, etc. for mandatory quarantine.

The Department of Human Resources has undertaken the following activities to keep the work environment safe for employees:

- Posting information throughout the offices relative to social distancing at work;
- Providing “sanitation stations” throughout the offices with disinfecting wipes and materials; and
- Fill vacant positions:
  - First interviews conducted via Zoom;
  - Second interviews (as applicable) conducted in person adhering to applicable CDC guidelines (i.e. social distancing, mask usage, etc.).

Human Resources will continue to process any COVID-19 related employee time off requests in accordance with Collective Bargaining Agreements, Personnel Handbook and the Families First Coronavirus Response Act (FFCRA).

Board of Commission

In accordance with Executive Order 2020-07 and in compliance with the Open Meetings Act, SHA Board Meetings will be held via electronic means through the duration of any and all “Shelter in Place” Executive Orders issued by the Governor of the State of Illinois and/or in accordance with Public Act 101-0640 which, among other matters, amended Section 7 of the Open Meetings Act to allow public bodies subject to OMA to conduct remote meetings under certain conditions.

Opening of SHA Offices to the Public Post Shelter in Place Executive Orders:

Effective December 7, 2020 the SHA administrative offices will re-open to the public for all programs and services by appointment only for the period covering December 7, 2020 through December 31, 2020. Effective January 4, 2021 all SHA administrative offices will reopen for walk ins. The following measures will be undertaken to ensure the safety of all employees and visitors:
• Provide Personal Protective Equipment (PPE) to employees inclusive of but not limited to: gloves, masks, hand sanitizer, wipes, etc. as available.

• Administrative Office Lobbies
  o Social distancing will be encouraged through placement of floor markers for visitors waiting in line in the lobby for the front desk/reception area and the rent collection window;
  o Chairs will be placed 6 feet apart in compliance with social distancing;
  o Sneeze guards will be installed as applicable at the Receptionist desks;
  o Implement and/or maintain hand sanitizer stations;
  o Implement temperature verification kiosk(s); and
  o Implement self-service kiosks for applicants, tenants, program participants, etc.

• Offsite Offices (Brandon, Bonansinga Hi-Rise, Hildebrandt Hi-Rise, Johnson Park Villas at Vinegar Hill)
  o Management offices will open to the public and conduct appointments with one resident at a time, as necessary to address social distancing.
  o Implement and/or maintain hand sanitizer stations;
  o Implement sneeze guards at workstations;
  o Implement temperature verification kiosk(s); and
  o Implement self-service kiosks for applicants, tenants, program participants, etc.

**FINANCE**

The Finance Division operations have essentially remained the same through the COVID-19 closure with the exception of rent collection. During the office closure to the public, the SHA accepted rent via drop box and/or mail and not in-person.

The Unaudited Financial Data Schedule (FDS) was submitted timely. The SHA anticipates submitting the Audited FDS within the prescribed timeframe (September 30, 2020). The 2019 Audit is scheduled to take place in June 2020.

The SHA will comply with the CARES Act effective March 27, 2020 through July 24, 2020 to waive late rent payment fees for Public Housing families. The SHA will follow its current policy as it relates to establishing repayment agreements with eligible families. To the extent repayment agreements required original signatures, in-person appointments will be scheduled
adhering to CDC guidelines (i.e. social distancing, masks, etc.). Monthly rent will accrue and is expected to be paid by families in residency.

All open Capital Fund Programs obligation and expenditure dates were automatically extended by twelve (12) months via the CARES Act.

In accordance with PIH Notice 2020-07, HUD provided the following waivers to Operating Fund regulations:

- 24 CFR 990.280 (b)(5) to permit PHAs to transfer up to the entire amount of the CARES Act Supplemental Funds between projects without having excess cash; and
- 24 CFR 990.280 (b) to permit PHAs complying with Asset Management to transfer funds to the Central Office Cost Center (COC) to pay for immediate needs of the COCC that exceed the safe harbors identified in Chapter 7 of the HUD Financial Management Handbook to prevent, prepare for, and respond to the coronavirus (NOTE: funds transferred to the COCC in excess of the Safe Harbors must comply with 2 CFR 200.404 and shall not exceed the safe harbors by more than 50%).

**HOUSING CHOICE VOUCHER PROGRAM**

Effective March 16, 2020, the HCV operations were impacted as follows:

- SHA Administrative Offices were closed to the public;
- Program forms were available for drop off via drop box at the Administrative Offices for processing;
- Interim re-examinations were accepted daily via drop box at the Administrative Offices for processing;
- Annual re-examinations were scheduled to meet HUD annual recertification guidelines however were not expected to be completed in-person;
- Inspections on occupied units were postponed until further notice; and
- Move-in inspections for vacant units were conducted accordingly.

In accordance with PIH Notices 2020-05 and 2020-13, the SHA elects to implement the following regulatory waivers:

**Applications/Voucher Issuance/Lease Up**

1. Implement an alternative process to accept applications. On April 20, 2020, the SHA revised its application procedures and posted a “pre-application” electronic portal
on its website to accept applications electronically through December 31, 2020. In person applications will resume on January 4, 2021.

2. Increase age to 26 for Foster Youth initial lease up through December 31, 2020.


4. Approve voucher extension requests, regardless of current SHA policy, not to exceed December 31, 2020.

5. Allow Project Based Vouchers to provide initial owner certification for move-in inspections through December 31, 2020.

6. Allow Homeownership Voucher holders to obtain independent professional inspection in lieu of HQS move-in inspection through December 31, 2020.

7. Waive requirement for Homeownership Voucher holders to obtain pre-assistance counseling through December 31, 2020.

Existing Program HCV Participants

1. Delay annual recertification of income and family composition to be completed for all program participants by December 31, 2020. SHA continues to process annual recertifications monthly and will only utilize the waiver for those households that have a challenge responding to the established processing timeframe. SHA will resume in-person recertification appointments January 4, 2021.

2. Delay annual HQS inspections. The SHA revised its Administrative Plan to conduct annual and/or biennial inspections. Any delayed annual or biennial HQS inspection will be completed as soon as reasonably possible but by no later than one year on which the biennial inspection would have been required absent the waiver. SHA will resume Annual HQS inspections by appointment only September 8, 2020.

3. Allow Landlord and HCV Participant to self-certify with photos that an emergency deficiency has been repaired through December 31, 2020. Where self-certification was used, SHA will inspect the unit no later than one year of the date of the owner’s certification.

4. Allow discretion on absences from units longer than 180 days for documented COVID-19 related reasons through December 31, 2020. The SHA will not make any HAP payments beyond December 31, 2020 for units vacant more than 180 consecutive days.

5. Extend automatic termination of the HAP contract for program participants paying 100% of HAP through December 31, 2020.
6. **Family Unification Program (FUP) Elected Waivers.**
   a. The SHA will suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020 and December 31, 2020; and
   b. The SHA will accept referrals of otherwise eligible youth who will leave foster care within 120 days through December 31, 2020.

7. **Homeownership Maximum Term.** The SHA will extend the homeownership maximum term for up to one year for expiring homeownership HAP contracts for households experiencing COVID related financial hardships.

**Administrative**

1. Adopt applicable revisions to the Administrative Plan without Board approval by September 30, 2020 and with Board approval by December 31, 2020, as applicable and necessary.
3. Delay updating of utility allowance schedule not to exceed December 31, 2020 depending upon vendor scheduling and ability to complete the study.
4. SHA will purchase the “Work Number” service as a COVID related expense to aid in third party verifications of employment income.

**MODERNIZATION & DEVELOPMENT**

The MOD/DEV Division re-strategized Capital Fund Project (CFP) work item priorities to focus on releasing work items that can be completed in vacant units and/or the exterior of properties from April through June 2020. The MOD/DEV Division anticipates releasing bids for occupied units beginning in May 2020. Any bid invitations released in May 2020 and forward will include social distancing measures allowing for one contractor in a unit / site at a time. Pre-bid meetings will be conducted electronically via conference call and/or web-based format.

The SHA anticipates preparing and submitting its 2021 PHA Agency Plan, Annual Statement and Five-Year Plan within the prescribed timeframe (October 15, 2020).

All open Capital Fund Programs obligation and expenditure dates were automatically extended by twelve (12) months via the CARES Act.
**PUBLIC HOUSING**

Effective March 16, 2020, the Public Housing operations were impacted as follows:

- SHA Administrative and Site-Based Offices were closed to the public;
- Program forms were available for drop off via drop box at the Administrative Offices for processing;
- Interim re-examinations were accepted daily via drop box at the Administrative Offices for processing;
- Annual re-examinations were scheduled to meet HUD annual recertification guidelines however were not expected to be completed in-person;
- UPCS Inspections on occupied units were postponed until further notice;
- Move-in inspections for vacant units were conducted accordingly;
- SHA Maintenance Staff were assigned to vacant unit preparation and site maintenance;
- SHA Maintenance Staff only responded to emergency work orders in occupied units;
- The SHA will comply with the CARES Act effective March 27, 2020 through July 24, 2020 to waive late rent payment fees for Public Housing families. The SHA will follow its current policy as it relates to establishing repayment agreements with eligible families. Monthly rent will accrue and is expected to be paid by families in residency by July 24, 2020 and/or as any State issued eviction moratoriums expire. (NOTE: For any unpaid rent during the moratorium, the family must repay the PHA or sign a repayment agreement to pay any amount owed after the moratorium has ended.);
- The SHA will comply with the Eviction Moratorium effective March 27, 2020 issued under the CARES Act. The SHA will not issue a notice to vacate for rent arrearage before July 24, 2020 and will not require a family to vacate for at least thirty (30) days after the end of the moratorium (July 24, 2020) and/or until any State or Federal issued eviction moratoriums expire; and
- The SHA will still evict families for lease violations as applicable under Illinois State Law (i.e. drug or criminal activity).

In accordance with PIH Notices 2020-05 and 2020-13, the SHA elects to implement the following regulatory waivers:

**Applications/Lease Up**

1. Implement an alternative process to accept applications. On April 20, 2020, the SHA revised its application procedures and posted a “pre-application” electronic portal on its website to accept applications electronically through December 31, 2020. In person applications will resume on January 4, 2021.
2. SHA will continue to conduct in-person lease signings, by appointment, practicing social distancing measures.

Existing PH Residents
1. Delay annual recertification of income and family composition to be completed for all program participants by December 31, 2020. SHA continues to process annual recertifications monthly and will only utilize the waiver for those households that have a challenge responding to the established processing timeframe. SHA will resume in-person recertification appointments January 4, 2021.
2. Delay annual UPCS inspections. SHA will resume annual UPCS inspections January 4, 2021 for all public housing units. SHA will conduct public housing unit inspections by appointment only effective September 8, 2020 through December 31, 2020, as applicable.
3. Delay completion of routine work orders. SHA will resume completion of routine work orders in occupied units, by appointment only, on September 8, 2020.
4. Suspend Community Service requirements through March 31, 2021.

Administrative
1. Adopt applicable revisions to the Admissions and Continued Occupancy Plan without Board approval by September 30, 2020 and with Board approval by December 31, 2020, as applicable and necessary.
2. SHA will purchase the “Work Number” service as a COVID related expense to aid in third party verifications of employment income.
3. Delay updating of utility allowance schedule not to exceed December 31, 2020 depending upon vendor scheduling and ability to complete the study.

ROSS Service Coordination
1. ROSS operations included telephone contact with all participants. In-person meetings are postponed until August 3, 2020.
2. Services through ROSS Operations will resume by appointment for the period covering September 8, 2020 through December 31, 2020. Effective January 4, 2021, ROSS services will be open for walk-ins.
3. Group events are postponed until August 3, 2020 and/or until community partners are equipped to provide services at the SHA sites. SHA may conduct a mix of in-person and virtual sessions with residents through December 31, 2020. State recommended occupancy and participation limits will be enforced as applicable.
4. SHA purchased and provided cloth masks as protective measures to residents at Bonansinga, Hildebrandt and the Villas at Vinegar Hill free of charge in April 2020.

**SELF-SUFFICIENCY PROGRAMS**

Effective March 16, 2020, the Self-Sufficiency Program operations were impacted as follows:

1. SHA Administrative Offices were closed to the public.
2. Program forms were available for drop off via drop box at the Administrative Offices for processing.
3. FSS operations included telephone contact with all participants.
4. Effective, December 7, 2020 through December 31, 2020 in-person services through FSS will resume by appointment only. Effective January 4, 2021 FSS services will be open for walk-ins.
5. SHA conducted a virtual/remote “Strong Families” event in June 2020 due to State of Illinois group activity restrictions.
6. Group events are postponed until August 3, 2020 and/or until community partners are equipped to provide services at the SHA sites. SHA may conduct a mix of in-person and virtual sessions with residents through December 31, 2020.
7. FSS Graduations will be conducted virtually through December 31, 2020.

In accordance with PIH Notices 2020-05 and 2020-13, the SHA elects to implement the following waivers:

1. Extend FSS Contract of Participations not to exceed December 31, 2020 for participants with documented COVID-19 related challenges.

**CONCLUSION**

As the COVID-19 pandemic began affecting the Springfield Housing Authority service area, the SHA complied with Federal, State and Local directives as it relates to providing services to vulnerable families in their time of need while balancing the needs of employees and community public health directives. This transition plan still allows for the SHA to provide critical services to families in need in HUD approved alternative formats while continuing operations and transitioning from a closed to the public setting to an open to the public setting.
The enclosed transition plan is subject to revision based upon further guidance provided by HUD, the State of Illinois, City of Springfield, Sangamon County, CDC, etc.
APPENDIX A

POSITIVE RESIDENT TEST RESULTS -- PROTOCOLS

Scattered Sites / Family Developments
If a report is made by a tenant/household/Department of Public Health of a positive COVID-19 diagnosis to the SHA, the SHA will implement the following measures:

1. The employee receiving the information will report the information to the Director of Human Resources;
2. The Director of Human Resources will inform the Asset Managers and contact the Department of Public Health for confirmation and guidance;
3. The AMP 2 Asset Manager will inform the Production Controller for emergency work order processing only;
4. The information will be kept in a secure, password protected spreadsheet on the H:Drive/Sharefiles/COVID-19 file folder for access by Human Resources, Asset Managers and the Production Controller.
5. Asset Managers will direct and control the work in the units and ensure responding Maintenance staff have access to appropriate PPE in responding to immediate, emergency work orders. All other work orders will be completed upon report that the resident has been released from medical care.

Hi-Rise / Senior Developments
If a report is made by a tenant/household/Department of Public Health of a positive COVID-19 diagnosis to the SHA, the SHA will implement the following measures:

1. The employee receiving the information will report the information to the Director of Human Resources;
2. The Director of Human Resources will inform the Asset Managers and contact the Department of Public Health for confirmation and guidance;
3. The AMP 2 Asset Manager will inform the Production Controller for emergency work order processing only;
4. The information will be kept in a secure, password protected spreadsheet on the H:Drive/Sharefiles/COVID-19 file folder for access by Human Resources, Asset Managers and the Production Controller.
5. Asset Managers will direct and control the work in the units and ensure responding Maintenance staff have access to appropriate PPE in responding to immediate, emergency work orders.
6. The SHA will draft and send out the following letters:
   • A letter to anyone named that came into close contact with the person. The letter will include information about possible exposure and recommended actions by the CDC/Public Health Department.
   • A letter to all residents in the building letting them know there has been exposure in their building and recommended actions by the CDC/Public Health Department.
   • An internal form that the SHA shares with the Public Health Department listing any symptomatic case. Once there are two symptomatic cases, confirmed positive, then the site will be considered to have an outbreak.

**NOTE:** It is against the law to release any COVID-19 positive tenant’s name to the public.
APPENDIX B

GENERAL RECOMMENDATIONS TO PROTECT EMPLOYEES & CUSTOMERS

- Employees should wear personal protective equipment (PPE) as applicable to their industry when possible.
- Customers are encouraged to wear face coverings while in public.

- Practice sensible social distancing, maintaining six feet between co-workers.
- All persons in the store should maintain a social distance of at least six feet between each other. Sales registers should be at least six feet apart.
- Consider downsizing operations or limiting store capacity.
- When possible, open all doors to reduce the need for direct contact.
- Stores with higher traffic could mark spaces 6 feet apart at the sales registers and outside the entrance to the store.

- Employees who appear to have symptoms upon arrival at work or who become sick during the day should immediately be separated from others and sent home.
- A sign may be posted on the store that individuals who have a fever, cough or any sign of sickness should not enter.
- Employees should avoid touching their eyes, nose and mouth – Do NOT shake hands.
- Employees will be required to take reasonable steps to comply with guidelines on sanitation from the Center for Disease Control and Prevention and the Illinois Department of Public Health.
- Encourage workers to report any safety and health concerns to the employer.

- Provide a place to wash hands or alcohol-based hand sanitizer containing at least 60% alcohol.
- Train workers in proper hygiene practices.
- Regularly sanitize any high-traffic areas, such as doorknobs, counters, etc.
- Customers could be asked to use hand sanitizer upon entering the store.

- Limit cash and check handling.
- Encourage customers to use credit/debit cards, tap to pay, Venmo, PayPal or another form of contact-less payment.
- Sanitize point of sale equipment after each use, including pens.
- Provide hand sanitizer and disinfectant wipes at register locations.
APPENDIX C

KEEPING THE WORKPLACE SAFE

- Practice good hygiene
- Stop handshaking & avoid touching face
- Increase ventilation
- Use videoconferencing

- Adjust/postpone large gatherings
- Limit business travel
- Limit food sharing
- Stay home if you or a family member is sick

- Use booking system to stagger customers
- Limit cash handling
- Use online transactions
- Practice social distancing

- Hold meetings in open spaces
- Remind staff of hand washing
- Sanitize high traffic areas
- Communicate COVID-19 plan with staff
APPENDIX D
PERSONAL PROTECTION EQUIPMENT

WHO SHOULD WEAR MASKS?
Medical and isolation team members
Healthscreeners (i.e. supervisor who takes employees’ temperature)
Those performing disinfection of common surfaces
Those with broad exposure to customers or employees

WHO SHOULD WEAR FACE SHIELDS?
Face shields are commonly used in healthcare and manufacturing. They can provide extra protection for those whom must work within three feet of another person due to their job requirements. They are not necessary unless you work in healthcare/ manufacturing, but they can help.

WHO SHOULD WEAR GLOVES?
Employees in isolation
Those performing disinfection of common surfaces
Employees handling trash
Employees handling food

Note: Gloves put employees at higher risk of exposure and are not recommended for general protective use for the following reasons:

- The COVID-19 virus does not harm your hands, so gloves provide no protection, and touching your face with contaminated hands, whether gloved or not, poses a significant risk of infection.
- Gloves often create a false sense of security for the individuals wearing them; people are more likely to touch contaminated surfaces because they feel they are protected from the virus because of the gloves when in reality, they are not.
- When wearing gloves, people are less inclined to wash their hands; this is counterproductive and puts others at higher risk; we want people to wash their hands because it is the number-one defense against any virus.
- Proper removal of gloves takes training; if contaminated gloves are not removed properly, employees are exposed to greater risk.
APPENDIX E

FEDERAL, STATE & LOCAL COVID-19 RESOURCES

US Centers for Disease Control

State of Illinois
http://www.dph.illinois.gov/restore

Sangamon County Health Department
https://scdph.org/

City of Springfield