

BRAINERD HOUSING AND REDEVELOPMENT AUTHORITY

COVID-19 Action Plan

Adopted: 3/25/2020

In response to the COVID-19 pandemic, the Brainerd Housing & Redevelopment Authority (HRA) has implemented several changes to its current policies and program procedures. These, which together make up the COVID-19 Action Plan, are hereby in place to ensure the health and safety of staff and to whom we serve.

EMPLOYEE BENEFITS

This policy expands Brainerd Housing & Redevelopment Authority's (hereafter referred to as the "Agency") current policies in response to the COVID-19 pandemic and is meant to communicate possible changes in our work environment, how employees will be paid now and in light of a possible state mandatory quarantine, and to communicate expanded benefits available in the Families First Coronavirus Response Act that was signed into law on March 18th, 2020.

This policy is temporary in nature and nothing under this policy should be construed as permanent or precedent setting. We will be reevaluating and updating this policy as we receive new guidance and/or there are changes to state or federal emergency declarations or mandatory shelter in place orders.

At this time we are considering the HRA and HRA staff as essential and our plan is to keep all staff working. We anticipate direct guidance by either HUD or by the Governor if a state mandatory quarantine is issued. We will implement increasingly aggressive measures to keep employee contact as minimal as possible. For example, a closed (office) door policy.

Families First Coronavirus Response Act

There are two aspects to this expansion: Emergency Paid Sick Leave ("EPS leave") and Emergency Family Medical Leave Expansion ("expanded FMLA"). These expanded leave policies become effective on April 1, 2020, and will remain in place through December 31, 2020. These leave policies will operate in conjunction with our current leave policies.

Emergency Paid Sick Leave ("EPS leave")

Eligibility - EPS leave is available regardless of how long you have been employed by the Agency.

Covered Reasons - You are entitled to EPS leave if you are unable to work or telework because you:

1. are subject to a federal, state, or local quarantine or isolation order related to COVID-19;
2. have been advised by a health care provider to self-quarantine because of COVID-19 concerns;
3. are experiencing COVID-19 symptoms and seeking a medical diagnosis;
4. are caring for an individual subject to a quarantine or isolation order or advised to self-quarantine because of COVID-19 concerns;
5. are caring for a child because, due to COVID-19 precautions because your child's school or place of care has been closed or your childcare provider is unavailable.
6. are experiencing any other substantially similar condition specified by the Secretary of Health and Human Services in consultation with the Secretary of the Treasury and the Secretary of Labor.

Amount of Leave - Eligible full-time employees are entitled to 80 hours of EPS. Part-time employees are entitled to the average number of hours the employee works during a two-week period. This leave will be provided at your regular rate of pay.

Usage of Leave - Unused EPS leave cannot be carried over to the following year, nor is it paid out at termination of employment.

The Agency will not require that you:

- Use other available paid or unpaid leave (including Vacation or Sick Leave) before allowing EPS leave.
- Find a replacement to cover your hours or shift before allowing EPS leave.

Additionally, the Agency will not retaliate against you if you use EPS leave or exercise your rights under the Act.

Emergency Family and Medical Leave Expansion (“expanded FMLA”)

Eligibility - If you have been employed for at least 30 calendar days, you are eligible for leave under the expanded FMLA.

Covered Reason - Expanded FMLA is available if you are unable to work (or telework) due to a need for leave to care for your child under age 18, if the school or place of care has been closed, or the child care provider of your child is unavailable, due to a COVID-19-related public health emergency.

Amount of Leave - Eligible employees are entitled to 12 weeks of leave under the expanded FMLA. The first 10 days of leave are unpaid, although you may elect to substitute 1st) EPS leave (above) if applicable and available and 2nd) other accrued paid leave during that time period.

Leave after the first 10 days will be paid at a rate of two-thirds of your regular rate of pay based on your regular schedule. However, paid expanded FMLA will not exceed \$200 per day or \$10,000 in total. You will be required to use accruals to bring pay to 100% of regular pay.

Reinstatement - When you return from expanded FMLA leave you generally have the right to return to the same or an equivalent position. However, expanded FMLA job restoration may be limited if the Agency has 25 or fewer employees and the following conditions are met:

- Your position no longer exists because of economic or other operating conditions affecting employment and caused by a public health emergency.
- The Agency makes reasonable efforts to return you to an equivalent position.
- If unable to return you to an equivalent position, the Agency makes reasonable efforts to contact you about available equivalent positions for one year beginning on the earlier of:
 - the end of your qualifying need; or
 - 12 weeks after your leave begins.

Relationship to FMLA - Expanded FMLA does not extend your entitlement to 12 weeks of leave under the Family and Medical Leave Act (“FMLA”). Instead, it adds an additional qualifying reason for leave and payment provisions. Therefore, you are only entitled to a total of 12 weeks per year for any FMLA-qualifying reason, including COVID-19 related leave.

Availability of Benefits

It is current policy that if the Agency closes (such as for inclement weather) that staff will get paid for the time they otherwise would have worked; likewise, if the Agency closes for reasons due to COVID-19, staff will receive full pay for the time the Agency is closed.

In addition, and only temporarily, if the Agency does not have enough work to keep a staff member busy for their full time hours through no fault of their own, that staff member will receive full pay.

Based on our current policies and our interpretation of the new expanded leave, the following benefits are available.

If you or a family member are sick (other than coronavirus related) – Your full accrual balance is available for use.

If you or a family member meet the covered reasons of the Emergency Paid Sick Leave (above) – You are entitled to 80 hours (2 weeks) of Emergency Paid Sick Leave (100% of pay), then your full accrual balance is available for use.

If you need to stay home to care for young children due to daycare and school closures due to a COVID-19 public health related emergency – You are entitled to 12 weeks of leave under Expanded FMLA as follows:

- *First 2 weeks* – Considered unpaid, however you can substitute 80 hours (2 weeks) of Emergency Paid Sick Leave (100% of pay) if applicable and available or your accrual balance for 100 % of pay.
- *Leave after 10 days (first 2 weeks)* - will be paid at a rate of two-thirds of your regular rate of pay based on your regular schedule to a maximum of \$200/day. You will be required to use accruals to bring pay to 100% of regular pay.

Absence for any other reason – Your full accrual balance of personal, comp and vacation accruals are available for your use.

If the HRA cannot operate at full capacity – Essential staff and Backups to Essential Staff will continue to provide limited services and meet unchanged reporting and other deadlines working from office or remotely depending on regulations in place. All staff will receive 100% of pay for regularly scheduled hours.

INTERNAL – STAFF-TO-STAFF INTERACTIONS

Office Protocols

- Common areas such as the Kuerig, water cooler, etc., are temporarily off limits.
- Staff will refrain from entering other offices, instead relying on phone, email, or instant messenger to communicate.
- Housekeeping staff will not be in the main office. Staff will need to clean and sanitize their own offices.
- Staff scheduling may be adjusted/staggered to reduce the number of staff in an area at a time.

- Main office staff will use the conference room door instead of the door closest to reception to limit the receptionist's exposure via foot traffic.
- Additional cleaning and sanitizing will be done on the copy machine, door handles, mail boxes, etc.

PROGRAM PROCEDURES

Move-ins

Public Housing/Brainerd South

- Move-ins will continue as scheduled.
- Prior to setting/confirming the move in appointment, staff will connect with the tenant to ask about symptoms and exposure to COVID-19.
- Move-in packets will be completed in isolation (i.e. the resident completing it on their own in their vehicle) and returned to the dropbox.
- Communication will be primarily over the phone and mail, with the option for documents to be exchanged using the dropbox.
- Maintenance staff will meet the tenant at the unit to give them they keys and the move-in paperwork and the brief orientation, as we are currently doing.
- Anyone with symptoms/exposure, will be rescheduled.
- Maintenance staff have access to PPE that they may choose to use if they feel the need.

HCV Participants

- Communication will be primarily over the phone and mail, with the option for documents to be exchanged using the dropbox. Prior to setting/confirming the inspection appointment, staff will connect with the participant and/or landlord to ask about symptoms and exposure to COVID-19.
- Anyone with symptoms/exposure, will be rescheduled.
- Staff will have access to PPE that they may choose to use if they feel the need.

Recertifications – All Programs

- All in-person appointments for recertifications are canceled. Residents will complete recertification packets that are provided to them via mail or door posting and then return them via mail, drop box, or email scan.
- Residents may connect with office staff or the Resident Service Coordinator if they have questions on how to complete the packet or what documentation to provide.
- The website will be updated to include recertification forms and advise tenants/participants to connect with their specific program regarding potential recertifications.
- Communication will be primarily over the phone and mail, with the option for documents to be exchanged using the drop box.

Move-outs

Public Housing

Maintenance staff will conduct move out walk-throughs after the tenant has left the unit, using sanitizing and cleaning procedures and PPE as needed.

HCV

- There is one March 31st HCV move-out. The participant also needs to recertify prior to receiving a new vouchers.
- A packet will be made up and highlighted and provided to the participant. If the participant arrived by car, they can sit in their car to complete the packet and knock on the door to let us know when they are done. If they did not arrive by car, they will first be asked about symptoms/exposure and if they are clear, they will be permitted to sit in the lobby to complete their packet. We will keep practicing social distancing and will not be re-using pens. We can provide a pen to the person and tell them it's now theirs to take with them.
- Communication will be primarily over the phone and mail, with the option for documents to be put in an envelope on the door at an approximate pre-arranged arrival time. The participant can just come grab their envelope from the door and continue on with the process, returning documents needed using the drop box or mail.
- Prior to setting/confirming the appointment, staff will connect with the participant to ask about symptoms and exposure to COVID-19.
- Anyone with symptoms/exposure, will be rescheduled.
- Staff will have access to PPE that they may choose to use if they feel the need.

Notification/April Briefings - HCV

- Notification will continue as planned.
- Communication will be done over the phone and via mail/email and envelope posting.
- Briefings will be done online. Tenants will be directed to our website for packets and the presentation.
- Vouchers will be issued after applicants have returned all the paperwork necessary to determine eligibility. All communication will be done as outlined above.

Work Orders - Public Housing/Brainerd South

- Work order priority will be determined on a case by case basis.
- As work orders are being taken, staff will ask about symptoms and exposure to COVID-19.
- Anyone with symptoms/exposure, will be rescheduled if possible, or in the case of emergencies, all precautions will be taken to minimize contact, disinfect as the staff works, and utilizing PPE.

HQS Inspections – HCV Participants

- Inspections for participants moving to a new unit and/or entering the HCV Program for the first time, along with emergency and compliant inspections will continue.
- Communications will be primarily over the phone and mail, with the option for documents to be put in an envelope on the door at an approximate pre-arranged arrival time. The participant can just come grab their envelope from the door and continue on with the process, returning documents needed using the drop box or mail.
- Prior to setting/confirming the inspection appointment, staff will connect with the participant and/or landlord to ask about symptoms and exposure to COVID-19.
- Anyone with symptoms/exposure, will be rescheduled.
- Staff will have access to PPE that they may choose to use if they feel the need.
- Recertification inspections will be suspended until further notice.

Informal Review for a Denial on Waiting List and Voucher Terminations

Denial on Waiting List:

- If an informal review is requested, we will ask the participant to appeal their denial by submitting a written explanation of why their denial should be overturned along with supporting documentation.
- Documents should be sent via fax, US mail, email or drop box.
- The Housing Choice Voucher Program Manager will contact the applicant for a phone review.

Voucher Termination:

- If a hearing is requested for a termination from the voucher program, we will ask the participant to appeal their termination by submitting a written explanation of why their termination should be overturned along with supporting documentation.
- Documents should be send via fax, US mail, email or drop box.
- Once the documentation is received, if needed, the hearing officer will hold the hearing via a telephone conference call.
- A decision will be mailed out by the hearing officer to the voucher participant.

RESIDENTS/TENANTS

Office Closure

There is no public entry into the main office building or into the Resident Service Coordinator office. Staff will continue to serve the public through telephone, e-mail, U.S. Mail, some online resources, and a system of document exchange using door postings and drop boxes. Items dropped in the Maintenance Drop Box will be conveyed to the main office three times daily by the Service Coordinator. The Resident Service Coordinator is still providing service to existing enrolled residents as well as enrolling new participants using a combination of phone, email, door posting, and drop box. He has also been providing general information on wellness, safety, and community resources using posters and bulletin boards.

Work Orders/Maintenance Requests

Work orders and maintenance requests should be reported by calling the Dispatch Caretaker line at 218-839-0055, which rings in the office during regular business hours and to the Dispatch Caretaker after hours and on weekends. Maintenance staff will assess work orders on a case-by-case basis. Non-emergency work orders may potentially need to be rescheduled. Prior to dispatching maintenance staff, residents will be asked if they or anyone in the household has flu-like symptoms or has had exposure to the COVID-19 virus. Staff may need to wear personal protective equipment while conducting their work.

Closure of Common Areas

The following common areas are being closed: mail waiting area, 2nd floor lounge/TV area, pool table area, game room, 2nd floor balcony/patio, community room, kitchen, and all lounges and balconies on 3rd through 12th floor. The laundry room and the smoking area have not been closed, however residents are reminded to practice social distancing while in these two excluded areas.

Activities & Building Events

All events and activities in the building have been canceled until further notice. This includes all Resident Council hosted events such as bread delivery, popcorn nights, BINGO, potlucks, and movie

nights. All Resident Council meetings and Activity Committee meetings are canceled as well. All ROSS educational events are cancelled.

Second Harvest food box recipients will receive deliveries in accordance to the following:

- 1) Nutrition Assistance Program for Seniors (NAPS) food boxes are to be delivered to each participant's apartment by the Resident Service Coordinator (RSC) and resident volunteers, thereby eliminating the opportunity for residents to congregate in one location within the building.
- 2) RSC shall receive and sign for delivery of NAPS boxes from the Second Harvest delivery driver. If RSC is not available the two resident volunteers have authority to receive and sign for the NAPS delivery.
- 3) If a resident is not available to receive their box, that resident's box may be left at the door with the RSC initialing the distribution list to indicate that the box was left. Security cameras are in place to reduce incidents of theft.-
- 4) Should the RSC not be available, two resident volunteers have authority to deliver boxes to residents and have the resident sign for their box or the volunteers may leave boxes at resident's doors. The volunteers will then initial the distribution list to indicate that they have left a box at a door.
- 5) If there are extra boxes or boxes which are not left at a resident's door, the volunteers shall contact Terry Quick, Maintenance Manager, at 218-839-1093 or other maintenance staff at 218-839-0053 (Dudley) or 218-839-0052 (Mike). Staff will allow entry to the RSC office where extra boxes may be left. Cheese blocks shall be put in the refrigerator in the maintenance staff office.
- 6) RSC will complete any required paperwork and will mail it to Sandy McKay at Second Harvest Northcentral Food Bank.

Cleaning & Sanitizing

Maintenance staff will be doing extra cleaning and sanitizing of high-traffic areas repeatedly each day. Residents are asked to do their part by practicing frequent handwashing, covering coughs and sneezes, limiting time out of their apartments if they are sick, and maintaining safe social distancing when around others.

Annual Recertification Appointments

All in-person appointments for recertifications are canceled. Residents will complete recertification packets that are provided to them via mail or door posting and then return them via mail, drop box, or email scan. Residents may connect with office staff or the Resident Service Coordinator if they have questions on how to complete the packet or what documentation to provide.

Guests & Visitors

Residents are asked to refrain from having unnecessary guests at this time. This does not include PCA's, social workers, mental health workers, and other essential service providers. Any visitors with fever, cough, sore throat or other flu-like symptoms are not permitted to visit. As all common areas are closed, service providers and critical visitors should proceed directly to the apartment of the resident they are visiting.

Rent Payments

Rent payments are still due timely and may be placed in any one of the three available drop boxes or mailed in. Residents wishing to enroll in automatic payment are encouraged to contact the office.

Drop Boxes

There are three (3) drop boxes residents may use to submit documents or other items, as requested. They are located in front of the main office building, by the Service Coordinator's office door, and next to the Maintenance office door.

Email Addresses

Residents with email access are encouraged to make contact with office staff using email. To facilitate this contact, email addresses are posted on informational postings.