

<b>Streamlined Annual PHA Plan (HCV Only PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 02/29/2016</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

<b>A.</b>	<b>PHA Information.</b>										
A.1	<p>PHA Name: <u>Vermont State Housing Authority</u> PHA Code: <u>VT901</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/01/2021</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Housing Choice Vouchers (HCVs) <u>4388 (including 5 yr MS)</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p>Copies of the PHA Plan are available at VSHA located at:</p> <ul style="list-style-type: none"> <li>One Prospect Street, Montpelier, Vermont 05602</li> <li>VSHA's website: <a href="http://www.vsha.org">www.vsha.org</a></li> <li>Contact person: Kathleen R. Berk, Executive Director 802-828-3295</li> </ul> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a joint Plan and complete table below)</p> <table border="1"> <thead> <tr> <th>Participating PHAs</th> <th>PHA Code</th> <th>Program(s) in the Consortia</th> <th>Program(s) not in the Consortia</th> <th>No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:				
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Lead HA:											
<b>B.</b>	<b>Annual Plan.</b>										

B.1

**Revision of PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

Y N

- ☒ ☐ Housing Needs and Strategy for Addressing Housing Needs.
- ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- ☒ ☐ Financial Resources.
- ☐ ☒ Rent Determination.
- ☒ ☐ Operation and Management.
- ☐ ☒ Informal Review and Hearing Procedures.
- ☒ ☐ Homeownership Programs.
- ☐ ☒ Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
- ☐ ☒ Substantial Deviation.
- ☐ ☒ Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

**Statement of Housing Needs and Strategy for Addressing Housing Needs:**

"Low income households have the least flexibility to adjust to higher housing prices or move to other locations and are therefore hard hit when housing markets are constrained or decline. Nearly 90,000 renter and owner households (36% of all households in the state) are cost burdened by their housing costs. This means their monthly housing costs consume more than 30% of their income for rent, mortgage, insurance, taxes and utilities --the maximum level considered affordable for the average household. Of these cost burdened Vermonters, 39,000 households (16%) spend more than half of their income for housing. These households are at especially high risk of housing instability, including frequent moves, eviction and even homelessness".

"Further, on the annual one-night count held in January 2019, 1,089 Vermonters were homeless— slightly less than during prior years, but indicative of the persistence of life-threatening unmet needs among the non-housed. The length of stay in Vermont's homeless shelters was at an all-time high in 2019"<sup>1</sup>.

"Indicators of housing quality challenges: For low income Vermont homeowners who are already spending more than 30% of their income for their monthly mortgage and recurring housing costs, paying for necessary home maintenance and repairs may be extremely difficult. Low income Vermonters who rent their homes as well as those who live in mobile home parks face complex challenges of seeking interventions from property owners and managers who may also have few funds available for costly next steps. Unless they are addressed, each of these challenges can lead to foregone home maintenance, overdue repairs and deteriorating housing quality".

The complete 2020-2024 Vermont Housing Needs Assessment is on file at VSHA, can be accessed at <https://accd.vermont.gov/housing/plans-data-rules/needs-assessment>

On March 13, 2020 Vermonters and their Housing Needs were put to the ultimate test. In response to the COVID 19 pandemic, Governor Phil Scott issued Executive Order 01-20, Declaration of State of Emergency in Response to COVID-19. On March 24, 2020 this was amended to include a Stay Home Stay Safe order for all non-essential employees, and on May 15, 2020 the Governor signed an eviction and foreclosure moratorium for the duration of Covid-19 crisis.

In March and April, as part of the Vermont COVID 19 Housing Emergency Response and Recovery Plan published by the Agency of Human Services, "Emergency shelters reduced census, expanded service to 24/7, closed and or relocated to new sites in order to meet social distancing guidelines and stay home/stay safe order. Majority of shelters closed to new guests". In early May, more than 1400 homeless / vulnerable households were staying in motels (12% were families with children and 88% are households with adults only).

On June 14, 2021, the Governor issued a directive to the Secretary of Commerce and And community Development 'lifting State restrictions" relating to the COVID-19 pandemic. VSHA in collaboration with Vermont's housing agencies, the Agency of Human Services, and homeless service providers are working collaboratively to move families from motels/hotels to transitional and permanent housing.

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<sup>1</sup> Vermont Housing Needs Assessment: 2020-2024 Completed for the Vermont Department of Housing And Community Development, February 2020

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VSHA's waiting list for Section 8 Voucher assistance is closed, except for Project-Based Vouchers, and the Authority's Disaster and Move-on (Move-up) Preferences.

Waiting List Statistics that follow are consistent with the Vermont Housing Needs Assessment and the Consolidated Plan.

#### Housing Needs of Families on VSHA's Section 8 Tenant-Based Waiting List

Primary Race	Number of Families	Percentage of Families
White	148	30.27%
Black	12	2.45%
Indian	5	1.02%
Asian	2	0.41%
Hawaiian	0	0.00%
Other	322	65.85%
<b>Total Families</b>	<b>489</b>	

Ethnicity	Number of Families	Percentage of Families
Hispanic	17	3.48%
Not Hispanic	472	96.52%
<b>Total Families</b>	<b>489</b>	

Bedroom Size		
Bedroom	Number of Families	Percentage of Families
0	10	2.04%
1	292	59.71%
2	111	22.70%
3	61	12.47%
4	15	3.07%
5+	0	0.00%
<b>Total Families</b>	<b>489</b>	

Family Type		
Type	Number of Families	Percentage of Families
Has Children	117	23.93%
Near Elderly Families	24	4.91%
Elderly Families	70	14.31%
Single	329	67.28%
Occupancy Disabled Families	294	60.12%

**Statement of Housing Needs of low-income families who reside in VSHA's jurisdiction.**

	Total Families	Percent of Total	MS Total Families	MS Percent of Total	S8 Mod Rehab Total Families	S8 Mod Rehab Percent of Total	HCV Total Families	HCV Percent of Total
All Families	3803		312		33		3458	
Single	2036	53.54%	225	72.12%	24	72.73%	1787	51.68%
Female HOH	2698	70.94%	202	64.74%	22	66.67%	2474	71.54%
Male HOH	1105	29.06%	110	35.26%	11	33.33%	984	28.46%

Race								
White	3565	93.74%	296	94.87%	28	84.85%	3241	93.72%
Black/African American	86	2.26%	8	2.56%	0	0.00%	78	2.26%
American Indian/Alaska Native	57	1.50%	4	1.28%	1	3.03%	52	1.50%
Asian	14	0.37%	1	0.32%	0	0.00%	13	0.38%
Native Hawaiian/Other Pacific Islander	4	0.11%	0	0.00%	0	0.00%	4	0.12%

Ethnicity								
Hispanic or Latino	77	2.02%	3	0.96%	4	12.12%	70	2.02%
Not Hispanic or Latino	3726	97.98%	309	99.04%	29	87.88%	3388	97.98%

Income							
Average Family Income	\$ 15,205.42		\$ 14,705.41		\$ 13,821.24		\$ 17,089.60
Extremely Low-Income	2951	77.60%	1.5% margin of error for the income levels				
Very Low-Income	681	33.45%					
Low Income	105	3.89%					
Over 80%	11	1.00%					

Total Household Members	7375		460		55		6860	
Wage Income	836	11.34%	34	0.46%	7	0.09%	795	10.78%
TANF Income	454	6.16%	22	0.30%	5	0.07%	427	5.79%
SS	2347	31.82%	224	3.04%	8	0.11%	2115	28.68%
SSI	1778	24.11%	181	2.45%	14	0.19%	1583	21.46%
Pension	218	2.96%	3	0.04%	1	0.01%	214	2.90%
Child Support	288	3.91%	4	0.05%	3	0.04%	281	3.81%
Federal Wage	6	0.08%	2	0.03%	0	0.00%	4	0.05%
General Assistance/ food stamps	780	10.58%	109	1.48%	14	0.19%	657	8.91%
Medical Reimbursement	1	0.01%	0	0.00%	0	0.00%	1	0.01%
Military Pay	4	0.05%	1	0.01%	0	0.00%	3	0.04%
Other Nonwage Sources	754	10.22%	51	0.69%	3	0.04%	700	9.49%
Own Business	42	0.57%	2	0.03%	0	0.00%	40	0.54%
Unemployment Benefits	249	3.38%	9	0.12%	3	0.04%	237	3.21%

Number of Children								
Household without Children	2520	34.17%	272	3.69%	24	0.33%	2224	30.16%
1	517	7.01%	20	0.27%	2	0.03%	495	6.71%
2	424	5.75%	12	0.16%	3	0.04%	409	5.55%
3	239	3.24%	4	0.05%	3	0.04%	232	3.15%
4	71	0.96%	2	0.03%	1	0.01%	68	0.92%
5	22	0.30%	1	0.01%	0	0.00%	21	0.28%
6	8	0.11%	1	0.01%	0	0.00%	7	0.09%
7	0	0.00%	0	0.00%	0	0.00%	0	0.00%
8	0	0.00%	0	0.00%	0	0.00%	0	0.00%
9	2	0.03%	0	0.00%	0	0.00%	2	0.03%

Total Number of Family Members								
1	2036	27.61%	225	3.05%	24	0.33%	1787	24.23%
2	801	10.86%	57	0.77%	2	0.03%	742	10.06%
3	452	6.13%	13	0.18%	3	0.04%	436	5.91%
4	309	4.19%	10	0.14%	2	0.03%	297	4.03%
5	123	1.67%	3	0.04%	2	0.03%	118	1.60%
6	58	0.79%	2	0.03%	0	0.00%	56	0.76%
7	18	0.24%	1	0.01%	0	0.00%	17	0.23%
8	4	0.05%	1	0.01%	0	0.00%	3	0.04%
9	0	0.00%	0	0.00%	0	0.00%	0	0.00%
10	0	0.00%	0	0.00%	0	0.00%	0	0.00%
11	2	0.03%	0	0.00%	0	0.00%	2	0.03%

Persons with Disabilities								
HOH Person with Disabilities	2247	30.47%	304	4.12%	13	0.18%	1930	26.17%
Family Members with Disabilities	522	7.08%	33	0.45%	1	0.01%	488	6.62%

1. All data Includes Homeownership data. 60 Homeownership households which equals to 1.58% of total households.
2. Source: Tenant Data Base (PHA – Web/PIC)

#### Policies that Govern Eligibility, Selection, and Admissions

1. Waiver authority adopted: In response to PIH Notice 2020-05 and 2020-13, COVID-19 Statutory and Regulatory Waivers for Public Housing, Housing Choice Voucher Programs, VSHA adopted and implemented the use several waivers, providing administrative relief and allow for alternative approaches to various aspects of operations. These waivers are attached to this Plan as *Addendum 1*.
2. On July 14, 2021, the VSHA Board of Director's will be asked to approve retitling and expanding the Authority's "Move-on" preference to "Move-up" preference to include additional transitional housing programs, including Agency of Human Services CARES Vouchers. This preference was implemented July 1, 2021 in accordance Housing Choice Voucher Program Waiver Authority, HCV 1, Administrative Plan.

**Financial Resources 2021**

	2021	2020
Section 8 Tenant Based Assistance Programs:	\$33,760,115.00	\$31,724,789.00
Resident Opportunity and Self-Sufficiency Grants:	\$330,637.00	\$239,142.00
Continuum of Care:	\$1,996,174.00	\$1,778,216.00
Section 8 Project Based Assistance Programs:	\$28,331,201.00	\$28,205,170.00
Property Management Fees:	\$1,136,834.00	\$1,116,288.00
Property Rental/Tenant Income:	\$167,963.00	\$171,771.00
Development Fees:	\$0.00	\$0.00
Vermont Housing Finance Agency Fees:	\$0.00	\$11,298.00
Miscellaneous Income:	\$1,497,235.00	\$1,452,827.00
Interest Income:	\$46,199.00	\$57,065.00
Total Sources	\$67,266,358.00	\$64,756,566.00

**Operation and Management:** On June 15, 2021, the Governor of the State of Vermont issued Executive Order No. 06-21, effectively ending the State of Emergency, and establishing COVID-19 Post-Emergency Recovery Activities. In response, VSHA issued a return-to-work plan, setting forth guidance / policy establishing work safe practices for staff / public and reopening plans of the Central Office. Policy attached, *Addendum 2*.

**Homeownership Programs:** On July 14, 2021, the VSHA Board of Director's will be asked to consider/approve amendments to the Authority's Section 8 for Homeownership Program, as follows:

- Participants need to have completed at least one 6-month lease term in Vermont immediately prior to applying to the VSHA homeownership program.
- The inspector must be a licensed professional home inspector in the State of Vermont.
- VSHA will conduct an HQS inspection at least bi-annually.
- VSHA will allow homeownership participants currently receiving homeownership assistance to port to Vermont and VSHA will absorb the family into the homeownership program or bill the initial PHA. VSHA will waive the requirement to lease at for a one-year term in Vermont for current, active homeowner recipients porting to Vermont. VSHA will require that the family meets the homeownership program's income requirements unless the family can demonstrate that they have pre-qualified for a mortgage.
- Change "the family must attend the briefing and counseling" to they just must attend the briefing for porting families.
- VSHA will require that families who are not existing homeowners under the homeownership program to lease in Vermont for at least a one-year period prior to applying to the VSHA homeownership program (under porting).
- VT minimum wage x 2000 for income going to adults, pre-approved financing amount \$75,000
- 640 credit score for one of the adults who will own the home.
- Remove new construction language.
- New construction is not eligible for the VSHA homeownership program.

**B.2****B.3 Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y N N/A  
☐ ☒ ☐

(b) If yes, please describe:

<b>B.4</b>	<b>Civil Rights Certification</b>  <u>Form HUD-50077</u> , <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>B.5</b>	<b>Certification by State or Local Officials.</b>  <u>Form HUD 50077-SL</u> , <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.



B.6

**Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

VSHA Continues to make good progress in carrying out and furthering its mission, "to promote and expand the supply of affordable rental and homeownership opportunities on a statewide basis".

Administering / operating programs during the COVID 19 Pandemic has been considerably challenging. With the use of HUD's waiver authority, which expires 12/31/21, we have been successful in meeting all programmatic requirements.

At the request of the Vermont Legislature, in partnership with the Agency of Commerce and Community Development, Vermont Legal Aid and the Vermont Landlords Association, using CARES Act funds, VSHA developed and administered a Rental Housing Stabilization Program (RHSP) to prevent homelessness and provide housing stability to Vermonters in need of rental arrearage assistance due to COVID-19 to avert tenant eviction.

RHSP provided funding for landlords on behalf of tenants, expending \$23,596,198 in assistance from 7/13/20 through 12/31/20 assisting 2479 unique landlords and 7614 unique tenants. See full report attached. Appendix 3.

Under the terms of grant agreement with the Agency of Administration allocating \$110,000,000, the Vermont Emergency Rental Assistance Program (VERAP) was created to help renters dealing with financial challenges related to the COVID-19 pandemic. For eligible households, the program offers rental and utility assistance to help Vermonters avoid eviction or loss of utility service. ERAP was established by the Consolidated Appropriations Act 2021 and was successfully launched by VSHA on April 5, 2021. Eligible households must have an income at or below 80% of area median income (AMI), be obligated to pay rent on a residential dwelling in Vermont. In addition, one or more individuals within the household must qualify for or have qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due to the COVID-19 outbreak, and be able to demonstrate risk of experiencing homelessness or housing instability.

1/1/21: Awarded funding to support Family Self-Sufficiency case managers.

4/1/21: Awarded 75 Mainstream 811 Vouchers (CARES Act)

7/1/21: Awarded 99 Emergency Rental Assistance Vouchers, funded under the American Rescue Plan Act.

Expanded the Project-Based Voucher (PBV) Program, awarding an additional 71 PBV's in 8 projects in 8 different communities and 5 unique counties.

Graduated 14 individuals from Family Self Sufficiency, disbursing a total of \$104,153.91 in escrow funds.

In partnership with the NeighborWorks Homeownership Centers, supported 3 families in achieving homeownership through VSHA's Section 8 For Homeownership Program.

Continue to administer state-funded housing grants, including the Department of Mental Health's Housing Subsidy plus Care and the Department of Health's Bridge to HOPWA programs.

Continues to perform housing inspections under the terms and conditions of grant agreements the Agency of Human Services' Housing Opportunities and Vermont Rental Subsidy programs.

Designated "High Performer" under HUDs Section 8 Management Assessment Program (SEMAP) for the period ending 9/30/19, as well as for the past consecutive seven years – designation carried forward to 9/31/20.

**B.7**

**Resident Advisory Board (RAB) Comments.**

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N  
☐ ☒

(a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

Amended 5/28/21 - NOTICE PIH 2021-14 (HA), Supersedes: Notices PIH 2020-33; PIH 2020-13; PIH 2020-05

**Attachment: Summary of Public Housing and HCV Waivers and Alternative Requirements**

(Refer back to the Notice using the item code for a full description and more detailed information.)

This chart summarizes the waivers authorized under this notice and the availability period for each. As stated in Section 5, PHAs must keep written documentation on the waivers applied by the PHA as well as the effective dates.

To fulfill those requirements, PHAs may but are not required to utilize the last two columns to record this information.

To fulfill those requirements, PHAs may but are not required to utilize the last two columns to record this information.									
Item		Statutory Authority	Regulatory Authority	Summary of alternative requirement	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption	VSHA Implementation Guidance	Comments/Considerations
1	PH and HCV-1 PHA 5-Year and Annual Plan - reference page 9 of waiver notice	Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2)	§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	Alternative dates for submission  Changes to significant amendment process	Varies based on FYE  12/31/2020	Yes	4/14/2020	Revised due date 10/18/20	Annual Plan approved 12/23/20
2	PH and HCV-2 Family Income and Composition: Delayed Annual Reexaminations - reference page 10 of waiver notice	Section 3(a)(1)	§ 982.516(a)(1), 960.257(a)	Permits the PHA to delay the annual reexamination of income and family composition  HCV PHAs must implement HCV-7 for impacted families if they implement this waiver	All reexams due in CY20 must be completed by 12/31/20. Reexams due between 1/1/21 and 12/31/21 would need to be completed by 12/31/21.	Yes - <u>SECONDARY</u> to HCV-3	5/28/2021	This waiver will only be used as a back-stop to prevent termination of assistance  Staff must increase payment standard or contract rent for HCV/PBV/MR, including utilizing the most recent UA schedule	Staff will document the use of this waiver
3	PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements - reference page 11 of waiver notice		§ 5.233(a)(2), 960.259(c), 982.516(a)	Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification	12/31/2021	Yes	5/28/2021	Staff must make every attempt to recertify families rather than delay the reexamination. Staff will accept self-certification - verification could occur over the phone (and documented) through email or postal mail with a self-certification form by the family. Staff shall remind families of their obligation to provide true and complete information.	Staff will document the use of this waiver

			Sub-regulatory Guidance Notice PIH 2018-18	PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later					Household stimulus payments of up to \$1200 and the temporary \$600 per week federal enhancement to unemployment insurance <b>are not</b> to be included in calculations of income. Regular payments of unemployment insurance (issued by the state) are treated as income, as is customary under program rules. If a family is receiving unemployment benefits due to COVID 19 and is required to continue paying childcare expense, the PHA can continue providing the deduction for childcare.
4	PH and HCV-4 Family Income and Composition: Interim Examinations -- reference page 12 of waiver notice	Section 3(a)(1)	§§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b), and (d), 960.259(c) 982.516(c)  Sub-regulatory Guidance Notice PIH 2018-18	Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	12/31/2021	Yes	5/28/2021	Staff shall make every attempt to recertify families rather than delay the reexamination. Staff will accept self-certification - this may occur over the phone (and documented) through email or postal mail with a self-certification form by the tenant. Staff shall remind families of their obligation to provide true and complete information.	Staff will document the use of this waiver  VSHA is adjusting our interim reporting policy during this time to require families to report increases in income (namely the receipt of unemployment benefits, or the increase in earnings as they go back to their normal hours/schedules) during this time.
5	PH and HCV-5 EIV System Monitoring - reference page 13 of waiver notice		§ 5.233  Sub-regulatory Guidance PIH Notice 2018-18	Waives the mandatory EIV monitoring requirements.	12/31/2021	No	N/A	Staff will continue monitoring EIV reports on a monthly basis	
6	PH and HCV-6 FSS Contract of Participation: Contract Extension - reference page 14 of waiver notice	Section 23(c)3	§ 984.303(d)	FSS has a provision that indicates that PHAs can extend Participation Contracts by up to two years (beyond the original five) for "good cause." PHAs should consider pandemic-related issues as an "automatic" good cause	12/31/2021	Yes	5/28/2021	Participants who are unable to graduate due to COVID may be granted a "good cause" extension to allow for graduation.	Unemployment benefits <b>do not</b> count as "earned income" and should not be counted toward escrow earnings. In addition, a participant who is <b>furloughed</b> is still considered employed for FSS purposes. A person who has been LAID OFF is considered unemployed

7	PH and HCV-7 Waiting List: Opening and Closing; Public Notice - reference page 14 of waiver notice		§ 982.206(a)(2)  Sub-regulatory Guidance Notice PIH 2012-34	Waives public notice requirements for opening and closing waiting list  Requires alternative process	12/31/2021	Yes	5/28/2021		
8	PH and HCV-8 Eligibility Determination: Income Verification - reference page 15 of waiver notice		§ 960.259(c), 982.201(e)  Sub-regulatory Guidance Notice PIH 2018-18	Waives the third-party income verification requirements for applicants, and will consider self-certification as the highest form of income verification at admission  PHAs must review the EIV Income and IVT Reports to confirm/validate family-reported income within 90 days	12/31/2021	Yes	5/28/2021	Staff must make every attempt to certify families rather than delay the issuance of a subsidy/voucher. Staff will accept self-certification - verification could occur over the phone (and documented) through email or postal mail with a self-certification form by the family. Staff shall remind families of their obligation to provide true and complete information.	NEW WAIVER  Staff will document the use of this waiver
9	PH and HCV-9 Eligibility Determination: Social Security Number and Citizenship Verification - reference page 16 of waiver notice	42 USC 1436a(d)(2)	§ 5.216(b)(2), (g), and (h), 5.218, 5.508(b)(2)(ii), (b)(3)(ii), and (g)  Sub-regulatory Guidance Notice PIH 2012-10	Waives the requirements to obtain and verify social security number documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV and Public Housing programs	12/31/2021	Yes	5/28/2021		NEW WAIVER  Staff will document the use of this waiver
	HQS-1 Initial Inspection - reference page 19 of waiver notice	Section 8(o)(8)(A)(i), Section 8(o)(8)(C)	§ 982.305(a), 982.305(b), 982.405	Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies <b>Where self-certification was used, PHA must inspect the unit no later than 6/30/2022</b>	12/31/2021  6/30/2022	Yes	5/28/2021	staff will accept owner certification ONLY if the situation requires AND if there are no life-threatening deficiencies Will include reminder that HQS waiver does not include a waiver of 24 CFR 35.1215, visual assessment for deteriorated paint	Staff will document the use of this waiver
9	HQS-2: PBV Pre-HAP Contract Inspection, PHA acceptance of completed units - Reference Page 19-20 of waiver notice	Section 8(o)(8)(A)	§§ 983.301(b), 983.156(a)(1)	Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies <b>Where self-certification was used, PHA must inspect the unit no later than 6/30/2022</b>	12/31/2021  6/30/2022	yes	5/28/2021	update guidance	

10	HQS-3 Initial Inspection: Non-Life Threatening Deficiencies (NLT) Option Reference Page 20 of waiver notice	Section 8(o)(8)(A)(ii)	HOTMA HCV Federal Register Notice January 18, 2017	Allows for extension of up to 30 days for owner repairs of non-life threatening conditions.	12/31/2021	Yes	5/28/2021	staff may provide an extension of up to an additional 30 days to the owner to make NLT repairs and continue to make payments to the owner during the period of that maximum extension. If the owner has not made the NLT repairs by the end of the PHA extension period, the PHA must withhold payments.
11	HQS-4 Initial HQS - Alternative Inspections Reference Page 21 of waiver notice	Section 8(o)(8)(A)(iii)	HOTMA HCV Federal Register Notice January 18, 2017	Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies  Where self-certification was used, PHA must inspect the unit no later than 6/30/2022	12/31/2021  6/30/2022	No  na	na  na	UPDATED GUIDANCE
12	HQS-5 Biennial Inspections - reference page 21-21 of waiver notice	Section 8(o)(D)	§§ 982.405(a), 983.103(d)	Allows for delay in biennial inspections  PHA's must require owner certification there are no life threatening deficiencies  PHAs must conduct all delayed biennial inspections from CY 2020 as soon as reasonably possible but no later than 6/30/22, and must conduct all delayed biennial inspections from CY 2021 as soon as reasonably possible but no later than 12/31/22	12/31/2021  6/30/2022  CY 2020: 6/30/2022 CY2021: 12/31/2022	Yes	5/28/2021	UPDATED GUIDANCE  staff will accept owner certification ONLY if the situation requires AND if there are no life-threatening deficiencies
13	HQS-6 Interim Inspections -- reference page 22 of waiver notice	Section 8(o)(8)(F)	§§ 982.405(g), §983.103(e)	Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods	12/31/2021	Yes	5/28/2021	staff will require owner certification and verification (photos, tenant certification)
14	HQS-7 PBV Turnover Inspections - reference page 23 of waiver notice		§ 983.103(c)	Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies  Allows for delayed full HQS inspection NLT than 6/30/2022	12/31/2021  6/30/2022	Yes	5/28/2021	staff will accept owner certification  inspections must be completed by 6/30/2022
15	HQS-8: PBV HAP Contract - HQS Inspections to Add or Substitute Units - reference page 23 of waiver notice	Section 8(o)(8)(A)	§§ 983.207(a), 983.207(b)	Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies	12/31/2021	Yes	5/28/2021	staff will accept owner certification

				Allows for delayed full HQS inspection NLT than 6/30/2022	6/30/2022			inspections must be completed by 6/30/2022	
16	HQS-9 HQS QC Inspections reference page 24 of waiver notice		§ 982.405(b)	Provides for a suspension of the requirement for QC sampling inspections	12/31/2021	Yes	5/28/2021		
17	HQS-10 HQS Space and Security - reference page 24 of waiver notice		§ 982.401(d)	Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.	Remains in effect one year from lease term or date of notice (5/4/2021), whichever is longer	Yes	5/28/2021		
18	HQS-11 Homeownership HQS Initial Inspection - reference page 24-25 of waiver notice	Section 8(o)(8)(A)(i), Section 8(y)(3)(B)	§ 982.631(a)	Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments Requires family to obtain independent professional inspection	12/30/201	Yes	5/28/2021	Staff will determine HQS requirements based on independent professional inspection	
19	HCV-1 Administrative Plan - reference page 25 of waiver notice		§ 982.54 (a)	Establishes an alternative requirement that policies may be adopted without board approval until 9/30/21  Any provisions adopted informally must be adopted <b>formally by 12/31/21</b>	9/30/2021  12/31/2021	Yes  Yes	5/28/2021	Any informally adopted policies must be formally adopted NLT 12/31/21	
20	HCV-2 Information When Family is Selected: PHA Oral Briefing - reference page 25 of waiver notice		§ 982.301(a)(1), 983.252(a)	Waives the requirement for an oral briefing  Provides for alternative methods to conduct required voucher briefing	12/31/2021	Yes  Yes	5/28/2021  5/28/2021	Briefings will be done telephonically or through other electronic / video platforms	
21	HCV-3 Term of Voucher: Extensions of Term - reference page 25 of waiver notice		§ 982.303(b)(1)	Allows PHAs to provide voucher extensions regardless of current PHA policy	12/31/2021	Yes	5/28/2021	Extensions will be provided in 30-day increments	
22	HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed - reference page 26 of waiver notice		§ 982.305(c)	Provides for HAP payments for contracts not executed within 60 days  PHA must not pay HAP to owner until HAP contract is executed	12/31/2021	No	N/A		
23	HCV-5 Absence from Unit - reference page 26 of waiver notice		§ 982.312	Allows for PHA discretion on absences from units longer than 180 days <b>PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days</b>	12/31/2021	Yes	5/28/2021		

24	HCV-6 Automatic Termination of the HAP Contract ( <i>zero HAP families</i> ) - reference page 27 of waiver notice		§ 982.455	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	12/31/2021	Yes	5/28/2021		
25	HCV-7 Increase in Payment Standard During HAP Contract Term - reference page 27 of waiver notice		§ 982.505(c)(4)	Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so.	12/31/2021	No	N/A		
26	HCV-8 Utility Allowance Schedule: Required Review and Revision - reference page 28 of waiver notice		§ 982.517	Provides for delay in updating utility allowance schedule	12/31/2021	No	N/A	VSHA updated the utility allowance schedules effective 12/1/20	
27	HCV-9 Homeownership Option: Homeownership Counseling - reference page 28 of waiver notice	Section 8(y)(1)(D)	§ 982.630, 982.636(d)	Waives the requirement for the family to obtain pre-assistance counseling	12/31/2021	No	N/A		
28	HCV-10 (FUP): FUP Youth Age Eligibility to Enter HAP Contract - reference page 29 of waiver notice	Section 8(x)(2)		Allows PHAs to increase age to 26 for foster youth initial lease up	12/31/2021	Yes	5/28/2021		
29	HCV - 11 (FUP): Length of Assistance for Youth - reference page 29 of waiver notice	Section 8(x)(2)		Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020 and December 31, 2020	12/31/2021	Yes	5/28/2021		
30	HCV-12 (FUP): Timeframe for Referral - reference page 29 of waiver notice	Section 8(x)(2)		Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days	12/31/2021	Yes	5/28/2021		
31	HCV-13 HOP: Maximum Term of Assistance - reference page 30 of waiver notice		§ 982.634(a)	Allows a PHA to extend homeownership assistance for up to 1 additional year	12/31/2021	Yes	5/28/2021		
32	HCV-14 Mandatory Removal of Unit from PBV HAP Contract - reference page 30 of waiver notice		§ 98.221(a); 983.258	Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 days from the last HAP but does not extend beyond December 31, 2020	12/31/2021	Yes	5/28/2021		



33	HCV-15 Project-Based Voucher (PBV) and Enhanced Voucher (EV) Provisions on Under-Occupied Units - reference page 30 of waiver notice	42 USC § 1437a(b)(3)(A)	§ 983.253(b), 983.260  Sub-regulatory Guidance Notice PIH 2019-9, 2019-23, 2016-02	Allows a PHA to permit a family to initially lease an under-occupied PBV or RAD PBV unit (a unit that has more bedrooms than what the family qualifies for under PHA subsidy standards) under certain circumstances as described, and to allow for the continued occupancy of PBV and EV families already under a lease for an under-occupied PBV, RAD PBV, or EV unit.	12/31/2021	Yes	5/28/2021		NEW WAIVER
35	11b SEMAP - reference page 39 of waiver notice		24 CFR Part 985	PHA to retain prior year SEMAP score unless requests otherwise	HUD will carry forward the most recent SEMAP score on record for any PHAs with a fiscal year on or before 12/31/21	Yes	5/28/2021		
36	11b-1 SEMAP - reference page 40 of waiver notice		§ 985.105(d)	Allows field offices to perform remote SEMAP confirmatory review instead of an onsite confirmatory review before changing a PHA's rating from troubled to standard or high performer	12/31/2021	Yes	5/28/2021		
37	11b-2 SEMAP - reference page 40 of waiver notice		§ 985.101(a)	Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores	1/1/2022	Yes	5/28/2021		
38	12a PHA Reporting Requirements on HUD Form 50058 - reference page 42 of waiver notice		24 CFR Part 908, §982.158  Sub-regulatory Guidance Notice PIH 2011-65	Waives the requirement to submit 50058 within 60 days  Alternative requirement to submit within 90 days of the effective date of the action	12/31/2020	Yes	5/28/2021		

39	MR-1 Family Income and Composition: Delayed Annual Examination - reference page 47 of waiver notice	Section 3(a)(1)	§882.515(a)	Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families	12/31/2021	Yes	5/28/2021		NEW WAIVER
40	MR-0 Family Income and Composition: Annual examination; Income Verification Requirements - reference page 47 of waiver notice		§5.233(a)(2)	Waives the requirements to use the income hierarchy described by Notice PIH 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual reexam as permitted under MR-1	12/31/2021	Yes	5/28/2021		NEW WAIVER
			Sub-regulatory Guidance Notice PIH 2018-18						
41	MR-3 Family Income and Composition: Interim Examinations - reference page 48 of waiver notice	Section 3(a)(1)	§5.233(a)(2), 882.515(b)	Waives the requirements to use the income hierarchy described by Notice PIH 2018-18. Allows PHAs to forgo third-party income verification requirements for interim reexams, including the use of EIV	12/31/2021	Yes	5/28/2021		NEW WAIVER
			Sub-regulatory Guidance Notice PIH 2018-18	During the allowable period of eligibility, PHAs may consider self- certification as the highest form of income verification to process interim reexams					
42	MR-4 Enterprise Income Verification (EIV) Monitoring - reference page 49 of waiver notice		§5.233	Waiving the mandatory EIV monitoring requirements.	12/31/2021	No	N/A		NEW WAIVER

			Sub-regulatory Guidance Notice PHH 2018-18					
43	MR-5 PHA Inspection Requirement: Annual Inspections - reference page 49 of waiver notice		§ 882.516(b)	<p>Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units</p> <p>All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver</p>	12/31/2021	Yes	5/28/2021	NEW WAIVER
44	MR-6 Adjustment of Utility Allowance - reference page 50 of waiver notice		§882.510	Waives the requirement to allow PHAs to delay the review and update of utility allowances	12/31/2021	Yes	5/28/2021	NEW WAIVER
45	MS-1 Mainstream Initial Lease Term - reference page 51 of waiver notice	Section 8(o)(7)(A)	§982.309(a)(2)(ii)	PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice	12/31/2021	Yes	5/28/2021	
46	MS-2 Mainstream Criminal Background Screening - reference page 52 of waiver notice	42 U.S.C. 13663(a), 42 U.S.C. 13661	§5.856, 982.553(a)	PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general	12/31/2021	Yes	5/28/2021	

47	MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority - reference page 52 of waiver notice	42 U.S.C. 8013(k)(2)	As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract	12/31/2021	Yes	5/28/2021	
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# Vermont State Housing Authority

## COVID 19 SAFETY AND HEALTH WORK PLAN (rev. June 2021)

*The Vermont State Housing Authority (VSHA) COVID-19 Safety and Health Work Plan (Plan) has been updated and revised, effective June 2021. This updated and revised Plan supersedes the Plan dated May 27, 2020, which is no longer in effect.*

*Provisions of the Plan may be added, removed, and revised as warranted by conditions that may impact COVID 19 exposure risk in the workplace and/or VSHA's employer and business obligations. Such conditions may include, but are not limited to: changes in the level of community transmission of infection; presence of infection among staff; guidance and recommendations from federal, State, and public health entities; and federal, State, and local mandates as required by statute, regulation, or ordinance.*

*Staff are encouraged to bring any questions or concerns regarding this Plan to the Director of Human Resources and Administration or the Executive Director.*

### I. PURPOSE

The purpose of the Vermont State Housing Authority (VSHA) COVID-19 Safety and Health Work Plan (Plan) is to:

1. Continue to protect the health and safety of VSHA's staff, clients, tenants, and the community, specifically with regard to exposure to COVID 19;
2. Implement the COVID 19-related requirements and guidance of the State of Vermont, the Centers for Disease Control and Prevention (CDC), the Occupational Safety and Health Administration (OSHA), the Department of Labor (DOL), and other public health and regulatory authorities;
3. Describe and define workplace practices that support productivity and efficient operations of the agency while maintaining safety, according to a framework based on COVID 19-related risk assessment and corresponding levels of risk mitigation measures; and
4. Document and communicate the measures toward complying and acting in accordance with the relevant requirements and guidance.

### II. DEFINITIONS

**COVID 19:** *A respiratory disease spread from person to person. SARS-CoV-2 is the virus that causes COVID 19.*

**Basic Infection Prevention Measures:** *Practices that discourage the spread of the novel coronavirus, including frequent handwashing by employees, clients and visitors; consistent use of face coverings, masks, and other PPE, as appropriate; encouraging individuals who are sick to remain offsite; promoting use of safer respiratory practices, such as covering coughs and sneezes; providing hygiene supplies and disposal receptacles for tissues,*

*PPE, etc.; flexible work arrangements and physical distancing; and regular housekeeping and sanitation practices.*

**Hazard Controls:** *Workplace procedures implemented to mitigate risk of occupational injury or illness and promote healthy, safe work environments. Types of controls (in hierarchical order) include elimination, substitution, engineering controls, administrative controls and PPE. For the purposes of COVID 19 exposure prevention during the pandemic, elimination, engineering controls, administrative controls and PPE are the most relevant, viable types of controls.*

**Risk:** *As defined by OSHA, the product of hazard and exposure; in this analysis, the hazard is the biological hazard, COVID 19; exposure pertains to the potential for exposure to sources of COVID 19 due to the job duties and work environment, and the extent to which the potential for exposure can be controlled/mitigated.*

**Risk Exposure Levels:** *OSHA's classification structure for worker risk of occupational exposure to COVID 19 categorizes jobs according to the potential risk of exposure in the course of a position's duties.*

### **III. RESPONSIBILITIES**

#### **A. VSHA Senior Management**

The designated health officers for VSHA are the Director of Human Resources and the Director of Maintenance; however, all VSHA Senior Management are responsible for the *oversight of and compliance with* this plan at the agency level, and have the authority to direct, stop, or modify activities as necessary to ensure safety and compliance with COVID 19 prevention requirements and guidance of the State of Vermont, the Centers for Disease Control and Prevention (CDC), the Occupational Safety and Health Administration (OSHA), and other public health and regulatory authorities.

Within the scope of Senior Management's responsibility to direct, stop, or modify activities as necessary is the oversight and approval of all plans related to onsite work during the pandemic, including the determination of which positions will be categorized as essential and non-essential to onsite programs and operations; which positions are suitable for remote work arrangements; and when and how staff in positions deemed suitable for and mandated to telework/work remotely will return to the worksite. Senior Management will make these determinations as informed by the mandates and guidance of the State of Vermont, CDC, OSHA, and other public health and regulatory authorities.

The Director of Human Resources and Administration is additionally responsible for the *administration and implementation* of the plan on the Agency level, including the following:

1. In conjunction with the Director of Maintenance, assessing the hazards in the workplace (see Hierarchy of Controls in this document).
2. Administering and updating protocols and guidelines, as necessary.
3. Regularly reviewing guidance from the State of Vermont, CDC, OSHA, and other sources; communicating updated, new, and relevant information to management.
4. Reviewing the effectiveness of the protocols and guidelines.
5. Leading and/or participating in any investigation of employee complaints, failure to comply with this protocol, or related policies or rules.
6. Ensuring that staff receive information and required COVID 19-related training.

7. Administering all COVID 19-related employee leaves of absence.
8. With the Director of Maintenance, ensuring sufficient inventory and distribution of cleaning and disinfecting supplies, personal hygiene supplies, and personal protective equipment (PPE).

## **B. Department and Division Management**

Department and Division Management is responsible for the *implementation of and for ensuring compliance with* the Plan on the department and division level, including the following:

1. Ensuring that all employees follow the preventative and protective measures outlined in the Plan.
2. Supporting telework/remote work arrangements and offsite meetings and trainings to the extent possible/practicable.
3. Creating onsite staffing plans to meet operational and programmatic needs while maintaining safety in the onsite work spaces.
4. Planning physical space to provide sufficient distance between desks, chairs, etc.; coordinating installation of physical barriers, removing excess furniture and reconfiguring furniture and fixtures, as necessary.
5. Implementing daily cleaning protocols of shared workspaces, door handles, etc., to supplement regular janitorial practices; communicating with Facilities to ensure adequate supply of all cleaning supplies, hand soap, paper towels, alcohol-based hand sanitizer, etc. within workspaces.
6. Ensuring any visitors, including clients and vendors, conduct health screenings upon arrival to the office or worksite and sign in on the contact log, when such health screenings are required.
7. Restricting visitors to those who must be onsite for essential work purposes.
8. Modeling, promoting, and communicating expectations for compliance with the plan.

## **C. Employees**

Employees are responsible to *follow the current policies, protocols and guidelines*, including, but not limited to:

1. Participating in/completing all COVID 19-related trainings.
2. Monitoring health symptoms on an ongoing basis, and, when required, conducting daily health screenings before or upon arrival at the work site.
3. Reporting to your supervisor when experiencing COVID 19 symptoms or if other COVID 19 risk factors exist that may require quarantine or contact tracing.
4. Staying home/not reporting to work onsite when sick.
5. Washing hands frequently, and upon arrival at the work site; using alcohol-based hand sanitizer when handwashing facilities are not available, or to supplement handwashing.
6. Practicing physical distancing as recommended by CDC or other public health entities.
7. Wearing a cloth or surgical face mask while in the presence of others in the workplace, when required.
8. Using safer respiratory practices (coughing and sneezing into elbow, properly disposing of tissues, etc.).
9. Cleaning desk, phone, and shared workspaces before and after each onsite work shift.
10. Limiting sharing of pens, phones, and other office items.
11. Limiting vehicle occupancy to one when driving for work, when this limit is in effect.
12. Wearing protective PPE as appropriate for each job task.

### III. EXPOSURE DETERMINATION

- A. Risk Exposure Levels:** OSHA's classification structure for worker risk of occupational exposure to COVID 19 categorizes jobs according to the potential risk of exposure in the course of a position's duties.

Categories include:

- **Lower Exposure Risk**—*Job duties do not require frequent, close contact with the general public, or contact with individuals suspected or known to be COVID 19 positive. Duties involve only minimal occupational contact with general public and coworkers.*
- **Medium Exposure Risk**—*Job duties involve frequent and/or close contact with individuals who may be infected with COVID 19 and/or contact with the general public during times of community transmission.*
- **High Exposure Risk**—*Job duties involve activities which carry a relatively high probability of exposure to known or suspected sources of SARS-CoV-2, including working with individuals confirmed or suspected of being COVID 19 positive.*
- **Very High Exposure Risk**—*Job duties carry a very high potential for exposure, during specific medical, laboratory or postmortem procedures. Very High Risk job duties are typically performed only by certain healthcare providers, laboratory technicians or morgue workers.*

**B. Occupational Risk Exposure Levels by Department and Position**

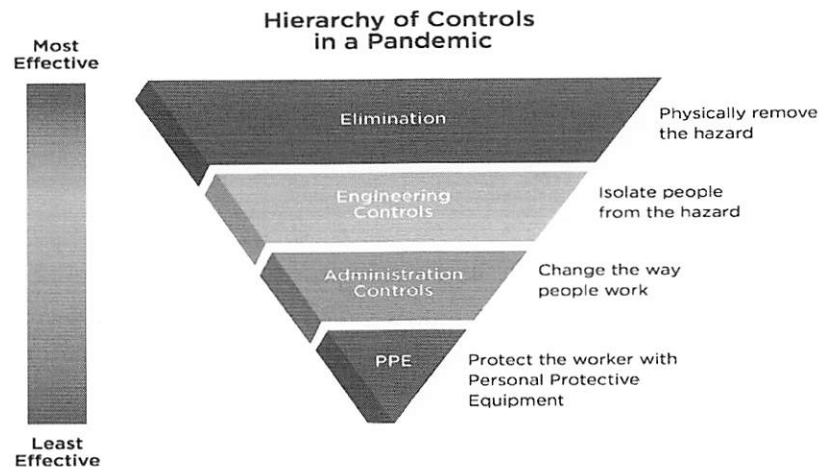
Applying OSHA's classification structure to VSHA's departments and positions, positions have been categorized according to the following levels. Please note that these designations are applicable only to COVID 19 exposure risk.

WORK AREA AND/OR JOB DUTIES	COVID-19 RISK LEVEL
Director, Maintenance	Medium
Maintenance Personnel	Medium
Director, Property and Asset Management	Low
Compliance and Property Manager	Medium
Property and Mobile Home Park Managers	Medium
SASH Coordinators	Medium
Director, Field Services	Medium
Field Representatives	Medium
Director, Housing Program Administration	Low
Contract Administrators	Medium
Self-Sufficiency Coordinators	Medium
Coc Staff	Low
Intake and Occupancy Coordinators	Low
Director, Finance and Information Systems	Low
Network Administrator	Low
Accountants	Low
Development Staff	Low
Director, Human Resources and Administration	Low
Office/Clerical who regularly interact with the general public	Medium
Office/Clerical with limited or no contact with the general public	Low
Executive Director	Low



#### IV. EXPOSURE RISK MITIGATION (HAZARD CONTROLS AND TRAINING & EDUCATION)

OSHA's Hierarchy of Controls provides the framework for VSHA's plan for COVID 19 exposure risk mitigation. With all hazards, it is VSHA's goal to eliminate the hazard when possible, and to reduce associated risk where the hazard cannot be entirely eliminated. In the context of the pandemic, controls have been applied to activities and environments to eliminate, reduce, or mitigate exposure risk.



- A. Elimination:** A safety measure or practice that entirely removes a hazard from the work environment is an elimination measure or practice. While elimination of hazards is the most effective of the controls in hierarchy, there are limited means by which elimination can be practically achieved. In the context of the COVID 19 exposure risk in the workplace, examples of elimination measures include requiring employees to telework and holding meetings remotely.
- B. Engineering Controls:** Engineering controls aim to control the hazard at its source by mitigating hazardous conditions or isolation of the employee from the hazard. Examples of engineering controls include ventilation, protective barriers, and adequate physical distancing.
- C. Administrative Controls:** Work practice controls, such as limiting travel, rotating schedules to reduce the number of staff onsite, daily health screenings, and limiting occupancy in common spaces are examples of administrative controls that mitigate risk by making changes to how work is conducted.
- D. Personal Protective Equipment and Source Control (i.e. cloth face masks):** PPE, such as surgical masks, gloves, and face shields, and source control (cloth face masks) are used to further reduce the risk of exposure, and are a supplement to the other controls in the hierarchy.
- E. Training and Education:** Though not included in the OSHA Hierarchy of Controls, training and education are important components of risk mitigation through information and communication on safety and prevention of COVID 19.

At all levels of the Plan, current information and training on COVID 19 risk factors and preventative measures, including proper use, care, and disposal of PPE and cloth face masks will be provided.

Informational notices and materials re: handwashing and other safety practices will be posted in visible

locations and/or distributed electronically; current information, policies, protocols, and guidelines to staff will be distributed through electronic and other means.

All staff will be participate in and complete all COVID 19 prevention training as required by VOSHA or other federal or State entities.

## **V. COVID 19 EXPOSURE RISK MITIGATION MEASURES (BY LEVEL)**

VSHA has developed a framework of practices intended to mitigate COVID 19 exposure risk while supporting productivity and efficient operations of the agency. This framework utilizes levels of preventative measures and practices that reasonably correspond to the level of risk of COVID 19 exposure in the workplace and accord with federal, State, and local mandates and guidelines. The levels are identified as Red, Orange, Yellow, and Green.

In general, VSHA will operate under Red Level practices when the risk of COVID 19 exposure is the highest, and/or when federal and State mandates with regard to COVID 19 precautions are most restrictive; Orange and Yellow Level practices will be in effect when the risk of exposure has been reduced, and federal, State, and local mandates are correspondingly relaxed; and Green Level practices will be in effect when the risk presented by COVID 19 is sufficiently low to resume pre-pandemic operations, with some additional, permanent precautionary measures in place.

Senior Management maintains the right to make changes to this Plan, including changes to the Levels and to certain practices within each Level, as it determines necessary to protect the health and safety of VSHA's workforce, clients, and tenants, to comply with federal, State, and local mandates and guidelines, or based on other relevant factors.

### **Red Level**

During periods of significant community transmission and work-related risk of exposure to COVID 19, Red Level controls may be implemented. Mandatory telework, modifications to the physical space, daily health screenings, and required face masks are some standard Red Level controls; below are additional controls that are applied at this level:

#### Elimination:

- All staff that can perform their job duties offsite will be required to telework to the maximum extent reasonably possible.
- All internal and partner meetings will be conducted virtually, using Zoom, Teams, or other virtual platform.
- The VSHA office will be closed to the public.
- Client meetings will be held over the phone or virtually.

#### Engineering Controls:

- Installation of physical barriers between staff, and/or between staff and clients (i.e. plexiglass, plastic sheeting, or similar barriers), as necessary/appropriate/practicable, where physical distancing cannot be maintained.
- Arrangement or configuration of workstations to meet physical spacing requirements.
- Increased ventilation (open windows, doors).

- Enhanced cleaning and disinfecting practices and regimen.
- Removal of shared items, excess furniture, and personal objects, especially from shared workspaces.

#### Administrative Controls:

- Telework will be mandatory to the extent possible/practical; when telework is not feasible, alternating or rotating schedules will be established to reduce the total number of staff at a work site at one time.
- COVID 19 symptom screenings will be performed daily by all staff, immediately prior to or upon arrival at the work site.
- Staff will be required to stay home and not report to the worksite if sick or experiencing symptoms of illness consistent with COVID 19; no symptomatic or COVID 19 positive staff are permitted to work onsite.
- In-person contact with staff from other departments will be minimized.
- Occupancy will be limited in confined and smaller spaces, such as offices, meeting rooms, and break rooms; restrooms will be used by one person at a time; one-way traffic patterns and one-direction staircases may be utilized; chairs may be removed to enforce occupancy limits.
- Vehicle occupancy for work travel will be limited to one staff.
- Nonessential travel to locations with ongoing COVID 19 outbreaks will be strongly discouraged (CDC travel warning levels are published at: [www.cdc.gov/coronavirus/2019-ncov/travelers](https://www.cdc.gov/coronavirus/2019-ncov/travelers)) and following Vermont's travel guidance (published at: <https://www.healthvermont.gov/covid-19/travel-quarantine>).
- Supplies and facilities will be provided to promote and support good personal hygiene (tissues, trash receptacles, handwashing facilities, alcohol-based hand sanitizer, etc.).
- Regular, frequent handwashing and/or using of alcohol-based hand sanitizer will be required immediately upon arrival at work and throughout the day.
- Contact Logs will be kept to record the presence of each individual staff, client, vendor, or visitor that is onsite each day.

#### PPE and Source Control:

- Cloth face coverings or surgical masks must be worn at all times, and must be worn properly, completely covering the nose and mouth when in the presence of others, while working onsite (reasonable accommodations may be made for people with medical or other restrictions). Double-masking (cloth mask worn over surgical mask) is recommended.
- Proper use of PPE appropriate to the risk presented, based on work environment, job duties, and other relevant factors will be required and supplied by VSHA. PPE that may be required includes surgical masks, disposable gloves, and face shields.
- Surgical masks will be available to clients, visitors, or vendors, as appropriate.

### **Orange Level**

To adapt the controls in response to a lower level of COVID 19 exposure risk due to reduced community transmission, lower rates of infection, higher rates of vaccination, and less restrictive federal, State, and local mandates and guidance, VSHA may implement Orange Level controls. Under the Orange Level, departments will develop schedules based on department needs and job-related requirements for staff to return to work onsite, with telework as an optional arrangement for positions that are eligible under the VSHA telework guidelines. Daily health screenings will no longer be required, and contact logs will not be maintained; face masks must still be worn at work while in the presence of others.

#### Elimination:

- Meetings with larger groups and community partners will continue to be held virtually/via Zoom, Teams, or other virtual meeting platform; one-on-one and small group meetings may be held in person, with each staff person wearing masks and appropriate physical distancing maintained.
- Client and tenant meetings will be held virtually or over the phone.
- The VSHA office will remain closed to the public.

#### Engineering Controls:

- All engineering controls at the Red Level continue to be applied at the Orange Level.

#### Administrative Controls:

- Staff may return to work onsite, with telework no longer mandatory. Alternating or rotating schedules may be established to meet department staffing and scheduling needs, while minimizing the number of staff onsite
- Staff are encouraged to monitor for symptoms of COVID 19, and are required to stay home and not report to the worksite if sick or experiencing symptoms of illness consistent with COVID 19; no symptomatic or COVID 19 positive staff are permitted to work onsite.
- In-person contact with staff from other departments will be minimized.
- Occupancy will be limited in confined and smaller spaces, such as offices, meeting rooms, and break rooms, as necessary to maintain appropriate physical distancing. Restrooms will be used by one person at a time.
- Vehicle occupancy for work travel will be limited to one staff.
- Nonessential travel to locations with ongoing COVID 19 outbreaks will be discouraged (CDC travel warning levels are published at: [www.cdc.gov/coronavirus/2019-ncov/travelers](http://www.cdc.gov/coronavirus/2019-ncov/travelers)).
- Supplies and facilities will be provided to promote and support good personal hygiene (tissues, trash receptacles, handwashing facilities, alcohol-based hand sanitizer, etc.).
- Regular, frequent handwashing and/or using of alcohol-based hand sanitizer will be required immediately upon arrival at work and throughout the day.

#### PPE and Source Control:

- Cloth face coverings or surgical masks must be worn at all times, and must be worn properly, completely covering the nose and mouth when in the presence of others, while working onsite (reasonable accommodations may be made for people with medical or other restrictions).
- Proper use of PPE appropriate to the risk presented, based on work environment, job duties, and other relevant factors is required and will be supplied by VSHA. PPE that may be required includes surgical masks, disposable gloves, and face shields.
- Surgical masks will be available to clients, visitors, or vendors, as appropriate.

#### **Yellow Level**

In addition to the less restrictive controls at the Orange Level, the Yellow Level further relaxes the controls, in response to reduced risk of COVID 19 exposure and infection. Notable changes in controls at the Yellow Level are options available to staff who are fully vaccinated, including the option to wear a face mask at work. "Fully vaccinated" status applies when two weeks or more have passed since the first dose of a one-dose COVID 19 vaccination or the second dose of a 2-dose COVID 19 vaccination. Please note that the duration of "fully vaccinated" status before another vaccination or booster vaccine is needed to continue protections against COVID 19 is not yet known; new information or guidance with regard to vaccinations may result in changes to this Plan.

Please note that elimination controls are not utilized at the Yellow Level.

#### Engineering Controls:

- All engineering controls at the Red Level continue to be applied at the Yellow Level.

#### Administrative Controls:

- The VSHA office will be opened to the public, with either limited hours or by appointment, or a combination thereof.
- Staff may return to work onsite, with telework as an option and no longer mandatory. Alternating or rotating schedules may be established to reduce the total number of staff at a work site at one time.
- Staff are required to stay home and not report to the worksite if sick or experiencing symptoms of illness consistent with COVID 19; no symptomatic or COVID 19 positive staff are permitted to work onsite.
- Occupancy will be limited in confined and smaller spaces, such as offices, meeting rooms, and break rooms, as necessary to maintain appropriate physical distancing.
- Staff that are not fully vaccinated will be required to adhere to the limit of one occupant per vehicle for work travel; fully vaccinated staff may travel in a single vehicle with another or other fully vaccinated staff.
- Nonessential travel to locations with ongoing COVID 19 outbreaks will be discouraged (CDC travel warning levels are published at: [www.cdc.gov/coronavirus/2019-ncov/travelers](https://www.cdc.gov/coronavirus/2019-ncov/travelers)).
- Supplies and facilities will be provided to promote and support good personal hygiene (tissues, trash receptacles, handwashing facilities, alcohol-based hand sanitizer, etc.).
- Regular, frequent handwashing and/or using of alcohol-based hand sanitizer will be recommended upon arrival at work and throughout the day.

#### PPE and Source Control:

- For staff that are not fully vaccinated, cloth face coverings or surgical masks must be worn at all times, and must be worn properly, completely covering the nose and mouth when in the presence of others, while working onsite (reasonable accommodations may be made for people with medical or other restrictions).
- Fully vaccinated staff are encouraged to wear cloth face masks or surgical masks when in the presence of others.
- Proper use of PPE appropriate to the risk presented, based on work environment, job duties, and other relevant factors is required and will be supplied by VSHA. PPE that may be required includes surgical masks, disposable gloves, and face shields.
- Surgical masks will be available to clients, visitors, or vendors, as appropriate.

### **Green Level**

When the risks presented by COVID 19 are sufficiently low to safely allow resuming pre-pandemic activities and practices, VSHA will implement Green Level controls. At the Green Level, while operations will largely return to pre-pandemic norms, there will be some controls that will continue to be applied indefinitely.

#### Engineering Controls:

- Physical barriers between workstations will remain in place.
- Workspaces will be configured to allow appropriate distancing between staff.

#### Administrative Controls:

- The VSHA office will be opened to the public, with either limited hours or by appointment, or a combination thereof.
- Staff will be expected to work onsite, with telework or hybrid schedules as an option for positions eligible for such according to the Telework Guidelines.
- Staff are required to stay home and not report to the worksite if sick.
- Supplies and facilities will be provided to promote and support good personal hygiene (tissues, trash receptacles, handwashing facilities, alcohol-based hand sanitizer, etc.).
- Restrooms will be used by one person at a time.
- Regular, frequent handwashing and/or using of alcohol-based hand sanitizer will be recommended upon arrival at work and throughout the day.

#### PPE and Source Control:

- For staff that are not fully vaccinated, cloth face coverings or surgical masks must be worn at all times, and must be worn properly, completely covering the nose and mouth when in the presence of others, while working onsite (reasonable accommodations may be made for people with medical or other restrictions).
- Fully vaccinated staff may wear cloth face masks or surgical masks, at their option. Masks during cold and flu season will be strongly encouraged.
- Surgical masks will be available for use by clients, vendors, and visitors.

## Sources

American Society of Safety Professionals. *How to Apply the Hierarchy of Controls in a Pandemic*. Park Ridge, IL: ASSE, March 31, 2020. <https://www.assp.org/news-and-articles/2020/03/31/how-to-apply-the-hierarchy-of-controls-in-a-pandemic>

U.S. Department of Health & Human Services. Centers for Disease Control and Prevention. *Considerations for Wearing Masks*. U.S. Department of Health & Human Services, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>

U.S. Department of Health & Human Services. Centers for Disease Control and Prevention. *Contact Tracing*. U.S. Department of Health & Human Services. Updated September 3, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/contact-tracing.html>

U.S. Department of Labor. Occupational Health and Safety Administration. *COVID-19 Hazard Recognition*. Washington, DC: OSHA, 2020. <https://www.osha.gov/SLTC/covid-19/hazardrecognition.html>

U.S. Department of Labor. Occupational Health and Safety Administration. *Guidance on Preparing Workplaces for COVID-19*. Washington, DC: OSHA, 2020. <https://www.osha.gov/Publications/OSHA3990.pdf>

U.S. Department of Labor. Occupational Health and Safety Administration. *Recommended Practices for Safety and Health Programs: Hazard Prevention and Control*. Washington, DC: OSHA. Accessed September 9, 2020. <https://www.osha.gov/shpguidelines/hazard-prevention.html>

U.S. Department of Health and Human Services. Centers for Disease Control and Prevention. National Institute for Occupational Safety and Health (NIOSH). *Hierarchy of Controls*. January 13, 2015. <https://www.cdc.gov/niosh/topics/hierarchy/>

State of Vermont. Agency of Commerce and Community Development. *COVID-19 Exposure Control Plan*. May 1, 2020. <https://accd.vermont.gov/content/covid-19-exposure-control-plan>

State of Vermont. Agency of Commerce and Community Development. *Vermont Forward Plan: Business Operations*. 2021. <https://accd.vermont.gov/covid-19/vermont-forward/business-operations>

State of Vermont Department of Labor. Vermont Occupational Safety and Health Administration. *Protecting the Health and Safety of Workers Training*. 2020. <https://labor.vermont.gov/vosha>

State of Vermont Department of Labor. Vermont Occupational Safety and Health Administration. *Memo: Workplace Safety Top 10 Recommendations Relating to Covid-19*. June 8, 2021. <https://labor.vermont.gov/news/memo-workplace-safety-top-10-recommendations-relating-covid-19>

PROPOSED REVISIONS (6.7.21)  
VSHA Chapter 4 Admin Plan - Local Preferences, pages 4-11 and 4-12

2. **Move-Up Preference:** This preference is available to recently/formerly homeless households who meet all of the following criteria –

- household certifies a need for, as well as readiness and willingness, to achieve housing stability by transitioning to a non-homeless permanent housing voucher;
- prioritized and referred by a local Vermont Coordinated Entry Provider;
- in compliance with referring program (*as certified by their current service provider*);
- in good standing\* with the current lease and/or occupancy agreement (*as certified by the property manager/owner, program operator or VSHA staff*);
- connected to a local service provider with a minimum of monthly housing case management services available for six months (*VSHA may waive this requirement on a case-by-case basis dependent upon household need*); AND
- currently residing in one of the following programs:
  - A) State of Vermont/Agency of Human Services/Vermont Rental Subsidy Program – Rapid Rehousing serving homeless families (*eligible at 6 months* of initial lease date);
  - B) Domestic Violence Transitional Housing projects dedicated to serving persons fleeing domestic violence, sexual violence and/or human trafficking which are currently listed on, or eligible to be included on, the VT CoC Homeless Inventory Charts of Homeless Beds (*eligible at 6 months* of initial lease/program start date);
  - C) VCRHYP-YHDP/CoC RRH Program – Rapid Rehousing dedicated to serving homeless youth (*eligible at 6 months* of initial lease start date);
  - D) VSHA Continuum of Care Program - Permanent Supportive Housing serving persons experiencing chronic homelessness (*eligible at 24 months* of initial lease date);
  - E) VSHA Continuum of Care Program - Rapid Rehousing serving individuals and families experiencing homelessness (*eligible at 6 months* of initial lease date);
  - F) VSHA Family Unification Program for Youth In Transition (FUP-Y);
  - G) Veterans Affairs Homeless Programs/SSVF – Rapid Rehousing serving Veterans, who are experiencing homelessness, in a project located in Vermont (*eligible at 6 months* of initial lease/program start date);
  - H) AHS CARES Vouchers (ESG-CV) - Rapid Rehousing serving Vermont homeless households impacted by the COVID-19 pandemic (*eligible at 6 months of initial lease date*).

*\*A tenant who is/was not in good standing with a property manager/owner due to a disabling condition may request a reasonable accommodation as part of the VSHA appeal process.*