



PIH

OFFICE OF PUBLIC & INDIAN HOUSING

Guidance for Public Housing Authorities (PHAs) on Supporting Access to COVID-19 Vaccinations for Residents and Staff

April 7, 2021

Supporting Access to COVID-19 Vaccines

As part of the administration's effort to get all Americans vaccinated, especially those at an increased risk of COVID-19 infection, the Office of Public and Indian Housing (PIH) is providing this guidance to assist public housing authorities (PHAs). PIH funds more than 3,000 public housing authorities (PHAs) across the United States and serves more than 3 million low-income households in the public housing and Housing Choice Voucher (HCV) programs. Our families include members of all ages and people working in essential services. PHAs employ staff who support the critical function of providing safe, stable, affordable homes to their residents.

With partners across state and local government, PHAs can assist in supporting access to vaccines for residents and staff. Working with state and local health departments, PHAs can:

- Support PHA staff, especially those who have contact with residents, to get vaccinated;
- Partner with health departments, health providers, and/or pharmacies;
- Monitor state and local updates on vaccination priorities, locations, and ways to register;
- Share local vaccination information with residents and keep residents updated; and
- Provide space for mobile or pop-up vaccination services or provide transportation for residents to vaccination locations.

Eligible Uses of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) Funds for the Public Housing and Housing Choice Voucher (HCV) Programs

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) (Public Law 116-136) provided supplemental funds for PHAs to "prevent, prepare for, and respond to coronavirus, including to provide additional funds for public housing agencies to maintain normal operations and take other necessary actions during the period that the program is impacted by coronavirus." Guidance on use of supplemental public housing and HCV Administrative fee funds for PHAs is provided in [PIH Notices 2020-07, 2020-08 and 2020-18](#). New eligible uses of HCV Administrative Fee funds under the CARES Act are posted at www.hud.gov/program_offices/public_indian_housing/programs/hcv.

Through this guidance, **PIH affirms that supporting staff and residents to get vaccinated against COVID-19 helps prevent, prepare for, and respond to COVID-19.** Because the federal vaccine rollout might evolve over time, there might be a need to update this guidance as circumstances change.

PHAs are encouraged to communicate directly and often with residents on vaccine eligibility, when known, and to include Resident Organizations in planning. PHAs can use CARES Act Supplemental Operating Public Housing funds or HCV Administrative Fees (as appropriate) for:

- Transporting residents and staff to or from a site providing the vaccine;
- Coordinating with health units to provide on-site vaccinations at a PHA or other mutually agreed upon site;
- Overtime or bonus pay for PHA staff assisting with vaccination efforts;
- Costs to develop or distribute educational materials related to COVID-19 or the vaccine;
- Hiring health service coordination staff including resident community health workers; to assist residents in locating and signing up for the vaccine and health insurance coverage;¹
- Individual or shared computing devices, such as laptops or multifunction tablets with keyboards, to allow for online registration;² and
- Setting aside units or non-dwelling space in the Inventory Management System-Public Information Center (IMS-PIC) system to allow for vaccine service.

In addition to the above list, PHAs may consider other activities to support vaccination efforts provided they support preventing, preparing for, and responding to COVID-19 and do not duplicate other federal benefits or subsidy. For example, the Health Resources and Services Administration's (HRSA) Provider Relief Fund provides funds to reimburse providers for vaccine administration fees for uninsured individuals.

Based on guidance from the Centers for Disease Control and Prevention (CDC), the federal government is providing the vaccine free of charge to people living in the United States.³ Residents and staff should not be paying any out-of-pocket fees to receive federally funded vaccines, including administrative fees and/or co-pays, regardless of their type of insurance coverage or lack of insurance.⁴ PHAs may consider the use of non-federal funds to provide incentives such as gift cards for residents to get vaccinated.

For all CARES Act fund expenditures, the requirements for 2 CFR Part 200 continue to apply, including cost reasonableness (200.404), government-administered services (200.444(a)(5)), and avoiding duplication of benefits or improper payments (200.53).⁵ PHAs receiving funds from the Federal

¹ PHAs may want to consider temporary/term positions for staff hired using CARES Act funds, as funding can be used for eligible expenses until December 31, 2021. See PIH Notices 2020-07, 2020-08 and 2020-18.

² See guidance in [Use of Public Housing Funding to Support Internet Connectivity for Residents](#) and [PIH COVID-19 FAQs](#).

³ Per CDC, vaccination providers may bill an insurance company, Medicaid, or Medicare for an administration fee. Vaccination providers can be reimbursed for this by the patient's public or private insurance company or, for uninsured patients, by the HRSA Provider Relief Fund. No one can be denied a vaccine if they are unable to pay the vaccine administration fee.

⁴ The Departments of Labor, Health and Human Services, and the Treasury issued guidance on group health plans and health insurance. See FAQs about Families First Coronavirus Response Act and Coronavirus Aid, Relief, and Economic Security Act Implementation FAQs Part 44 available at <https://www.dol.gov/sites/dolgov/files/EBSA/about-ebbsa/our-activities/resource-center/faqs/aca-part-44.pdf>.

⁵ HUD issued a final rule implementing 2 CFR Part 200 in the various grant programs on December 7, 2015 (80 Federal Register 75942). See also the Capital Fund rule at 24 CFR 905.202(i).

Emergency Management Agency (FEMA) are also governed by their requirements, including those for duplication of benefits.

Public Housing Authority (PHA) Staff Are Essential Critical Infrastructure Workers

PHA staff perform critical services for their residents and the public. They help families find and keep affordable and safe housing and provide access to essential community resources. Stable housing is an important mechanism to prevent exposure to COVID-19.

In [guidance](#), the Department of Homeland Security's Cybersecurity & Infrastructure Security Agency (CISA) designated workers responsible for the leasing of residential properties, property management, maintenance, and related service calls, reception of deliveries, mail, and other services as "essential critical infrastructure workers." As states expand access to COVID-19 vaccines, they may include priorities for essential critical infrastructure workers. PHAs should stay up to date on changes in state vaccine policies and communicate this information to employees. For a summary of state vaccination policies, see "Links for More Information" in this guidance.

Once the vaccine is widely available, PHAs may consider policies that require current vaccinations for workers who interact with residents. PHAs may also consider incentive compensation in accordance with 2 CFR 200.430(f) for staff to get vaccinated.⁶ PHAs can allow staff to use PHA-provided devices and internet service to register online for a vaccine appointment. Personnel policies related to COVID-19 and the vaccination must comply with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), and any related state laws. Based on [guidance](#) from the U.S. Equal Employment Opportunity Commission (EEOC), employers can have a qualification standard that includes "a requirement that an individual shall not pose a direct threat to the health or safety of individuals in the workplace."⁷

More Information

- [COVID-19 Vaccination Communication Toolkit for Community-Based Organizations](#)
- [Federally Qualified Health Center's Community Vaccination Centers](#)
- CDC – [Key Things to Know About COVID-19 Vaccines](#)
- [Healthcare.gov](#) – new special enrollment period open until May 15, 2021
- [National Center for Health in Public Housing](#)
- National Academy for State Health Policy - [State Plans for Vaccinating their Populations against COVID-19](#)

In the coming weeks, PIH will begin disseminating COVID-19 Vaccine Bulletins to provide updates related to opportunities for HUD/PIH-assisted residents to access COVID-19 vaccinations in their communities. For questions on this guidance or CARES Act funds for PIH programs, contact PIH-COVID@hud.gov.

⁶ Incentive pay is governed by 2 CFR 200.430 (Compensation-personal services), including the requirement that total compensation be reasonable for the services rendered. For more information on pay related to COVID-19, see [FAQ EP4](#).

⁷ See Section K, Vaccinations.