

May 7, 2020

We are grateful for the opportunity to provide input to the Reopening Advisory Commission. We have previously submitted the principles and key questions (attached for reference) that we feel should guide the Commonwealth's approach to reopening and recovery. We are committed to a safe and cautious recovery that will be **grounded in science and data, and prioritizes the health and safety of our all of our residents** and takes special measures to **care for vulnerable populations**. We look forward to working together in a **coordinated and regional approach**, so that we avoid an uneven patchwork response that would surely create confusion among our residents, and potentially even put areas of our Commonwealth in danger.

Since we submitted our first document, we have continued to work with Mayors and Managers to develop the following list of priorities. These are the areas on which we plan to focus our attention as we work with you to create the reopening plan for our Commonwealth.

## **I. Guidance to Cities and Towns: Safe Reopening and Enforcement**

State guidelines must be detailed and clear so that cities and towns have appropriate direction about how and when to safely reopen their facilities, businesses and public spaces, and provide vital services. When municipalities enact different regulations, it creates confusion and panic among residents, decreases compliance, and complicates enforcement.

We feel that the guidance should be detailed enough that every municipality in the Commonwealth has clear direction. The guidance also needs to be flexible enough that municipalities are allowed to enact more stringent requirements in the best interests of residents, workers, and municipal employees. This is particularly true for dense communities at high risk for a second peak of COVID-19 infections and communities with larger proportions of those populations that are more vulnerable to the virus.

On the specific issue of reopening businesses, we expect the state to provide detailed guidance to cities and towns so they can effectively communicate and enforce safe practices. The guidance should include measures such as distancing requirements, inspection standards, testing protocols, and efforts to safeguards employees, customers, and family members. Municipalities will have the primary responsibility to enforce these requirements, but many municipalities across the Commonwealth have very limited enforcement staff. Cities and towns will need additional support from the state, which might include expanded inspectional staff and increased financial resources to hire and pay third-party inspectors.

## **II. Main Streets and Neighborhood Businesses**

The reopening plan should include specific requirements and benchmarks for the reopening of smaller, neighborhood businesses. These businesses are critical to local economies and they face significant challenges in being able to survive past the early phases of this crisis. Neighborhood businesses are particularly vital in some of our hardest hit communities, and they will serve as the backbone of neighborhood revitalization.

The reopening plan should give clear benchmarks, guidance, and procedures necessary for reopening, in order to ensure the safety of employees and customers. These metrics should be provided in multiple languages, and should be provided to neighborhood businesses well in

advance of reopening to allow enough time for them to make any necessary changes to their business model or operations. We expect that this guidance will be different from those applied to larger corporations, which often have larger facilities, many more employees, less customer traffic, and greater resources.

We anticipate that operational guidance would include a framework for when businesses can open, information about how many customers and employees can be on the premises at a time, the ability to operate in public spaces, and how to handle deliveries. Regulations should be coordinated across municipalities to ensure that every business is operating under the same regulatory conditions, and to ensure consistent messaging to customers regarding the safety of our local businesses.

Municipalities will need support to meet the expanded staffing needs that will be required for this regulatory work, to ensure adequate personnel can conduct existing and new inspections in an efficient and timely manner. Many businesses will need technical assistance to follow new guidelines, including state and local support in obtaining needed PPE, cleaning supplies, and access to testing, as well workforce development support for businesses that have lost employees. Additionally, grants, loans, forbearance on certain debts, tax abatements, temporary regulatory relief, and other creative solutions are all essential, and will likely need to go beyond whatever relief is provided through federal programs.

### **III. Testing and Contact Tracing, Containing Outbreaks, and Implementing Follow-Up Actions**

The Commonwealth must work together with cities and towns to develop and implement a statewide testing plan. This plan should incorporate the Commonwealth's contact tracing program as well as a plan to create facilities for isolation or quarantine of affected individuals. The plan should include surveillance testing and benchmarks that might trigger a return to stringent physical distancing measures, all based on the advice of experts and the consensus of the scientific community.

Before we begin to relax physical distancing measures and do more than a limited reopening of our economy, we must see a significant and consistent decrease in infection, both in absolute numbers and as a percentage of those tested. Significant testing must be expanded for the general population so that everyone with symptoms can be tested promptly. Regular surveillance testing of the population for both infections and antibodies should be conducted so as to accurately track the spread of the virus, and help to monitor potential hotspots or outbreaks.

State support is especially critical for less well-resourced communities, which do not have the capacity to set up place-based or mobile testing regimes on their own and may not have a local health care or ambulatory care provider able or willing to help them do so. The reopening plan should not go forward unless and until the Commonwealth has both a plan in place and the capacity to provide adequate and prioritized access to testing for those in high touch occupations, including first responders, health care workers, vital service industry personnel, grocery and pharmacy employees, nursing and group home staff, and teachers, early educators and all people who work in schools and child care settings.

As a complement to vigorous and widespread testing, our contact tracing system must be consistent in every corner of the Commonwealth. A strong testing plan will only be effective if it is

supported by a contact tracing program that can enable the rapid identification of all positive or exposed individuals. To make this possible, the state should strongly consider adopting a complementary digital contact tracing platform to complement the efforts of human contact tracers. When such cases are identified, people need to be able to isolate and quarantine effectively. As we know however, many people may not be able to isolate or quarantine safely in their homes or institutions, so there will be a continued need to provide alternative isolation and quarantine facilities to support such individuals and protect others from transmission.

The reopening plan must address the unfortunate but likely scenario that we will see a significant rise in cases. The plan should outline specific benchmarks that would trigger a return to more stringent physical distancing measures and clear steps that the state and municipalities would take to immediately intervene with businesses and in communities that see outbreaks. These benchmarks may be based on case counts, the rate of increase, hospital capacity, or other factors.

Local public health authorities must be able to act according to detailed and clear state guidelines, with reliable and swift communication between local and state officials. Developing such a system requires close collaboration between state and local officials before reopening begins.

Finally, the plan for testing, contact tracing, and isolation or quarantine should include special considerations for frontline communities where the infection rate has been high. These communities are also the most likely to experience additional infections in the future, not least because of the presence of essential workers who provide support for so many other residents in the Commonwealth. The state plan should include special steps and additional resources to mitigate future infections in these communities, and to ensure that those who have suffered the most during the surge do not suffer again during recovery.

#### **IV. Addressing our Transportation Needs**

As leaders of communities in Metropolitan Boston, we understand that transportation is the backbone of our economy. The past several weeks have seen a radical shift in the way that our residents get around, and as we look ahead to recovery, we expect that shift to continue. While many employees in our region will continue to work from home, many employees do not have that luxury. Those that return to work in the metro region might opt not to take public transportation, creating congestion on our roads and an increase in air pollution and greenhouse gas emissions.

The reopening plan should address these transportation challenges and opportunities. Many of our neighborhood businesses would be able to safely reopen if they could use the public streets and parking lots adjacent to their stores and restaurants for outdoor retail and dining. We should increase our biking and pedestrian options to give people another way to get to their jobs or to stores. We should also use this opportunity to invest in a bus system that helps to cut down on commute times, reducing headways and therefore reducing crowding on buses. This will help to slow the spread of disease in lower income communities that rely on transit as their most reliable mode of transportation. Cities and towns are eager to partner with MassDOT and the MBTA to address this important aspect of our recovery.