



# OFFICE OF POLICY, PROCEDURES AND TRAINING

DHS-PB-2024-009

<p><b>Policy Subject:</b></p> <p><b>Code Grey</b></p>	<p><b>Applicable To:</b></p> <p>All Directly operated or Contracted Street Homeless Solutions, Single Adult, Adult Family, and Families with Children Facilities/Programs Serving Individuals who are Homeless, DSS and DHS Staff, and Collaborating Agencies</p>	<p><b>Effective Date:</b></p> <p>June 12, 2024</p>
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<p><b>Administered By:</b></p> <p>Adult Services, Family Services, Street Homeless Solutions, and Emergency Management</p>	<p><b>Approved By:</b></p> <p>Joslyn Carter, Administrator Department of Homeless Services</p>
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## INTRODUCTION

The purpose of this policy is to ensure that vulnerable sheltered adults and street homeless populations are properly served during extreme and hazardous air quality periods. Although New York City’s outdoor air quality has improved greatly in recent decades, occasional spikes in harmful pollutants will continue to be a threat due to the City’s potential for natural or man-made air quality events.

**Code Grey** was introduced after the 2023 Canadian wildfires created an air quality emergency in New York City. It provides instruction concerning Street Homeless Solutions Outreach, Drop-in Centers, and Adult Services’ shelter emergency operations, and support from DSS Emergency Management (EM).

## POLICY

### **Declaration of Code Grey**

NYC Emergency Management (NYCEM) has established a Citywide Air Quality Emergency plan that is activated during periods of extreme or hazardous air quality conditions, as defined by the National Weather Service (NWS). This policy is consistent with NYCEM’s Citywide Air Quality Emergency Plan Activation Triggers which include:

**Activation Triggers:**

- **Air Quality Index (AQI) is forecast to be 201 or greater.**
- Incidents with anticipated impacts to NYC air quality (e.g., wildfires in the Northeast).
- At the request of DOHMH, DEP, or City Hall.

**Important Note:** Code Grey is continually in effect (day and night) from the time that it is declared through the duration of the AQI Advisory, Watch, or Warning. Code Grey can happen regardless of time of year, weather conditions and temperature – however, hazardous air quality can be made worse by hot temperatures and stagnant air. Code Grey can be activated simultaneously with another code alert (ex. A code red level 1 or 2 can be activated simultaneously with a code grey during the summer months). **In the event of simultaneous extreme heat and air quality events, heat mitigation and response actions take precedence.** Please refer to *NYC Heat Emergency Plan* for more information.

**BACKGROUND**

New York City routinely observes air quality index (AQI) readings of 20 on a good day and up to 150 during warmer months when air masses can stagnate and trap particulates/pollutants in the area. AQI readings above 150 are deemed by the EPA as hazardous to humans and typically the threshold where health impacts will begin to be seen and felt by the public with vulnerable populations most at risk (seniors, children and people with pre-existing respiratory illness).

**Canadian wildfire event, June 2023:** On June 6, 2023 AQI readings of 407 were measured in New York City, breaking all previous records and considered extremely hazardous. Wildfires raging in Quebec, Canada had their smoke pushed southward by prevailing winds causing typical summer smog to evolve into a dense smokey orange haze that impacted outdoor activities and public health. Poor air quality remained in the area for days due to wind patterns and persisting fire conditions in Quebec, Canada.

**REVIEW/UPDATING**

Minimum annual review of this policy and any changes will be completed in collaboration among Adult Services, Street Homeless Solutions, DSS Emergency Management, and as needed with additional stakeholders.

SHS will meet with Outreach (OR) teams to review and plan for the season in the spring. OR teams will submit lists of vulnerable clients using Street Smart and identify locations or subway stations that may be particularly hot and require checking during an activation.

## PROCESS

### Activation & Coordination of Code Grey

DSS and DHS' Code Grey policy is activated by DSS EM when the above criteria are met and NYCEM issues/activates and Air Quality Emergency Plan. DSS and DSS/DHS will take the following steps for activating and coordinating Code Grey:

- DSS EM will send an e-mail notification to the DSS/DHS Operations Desk alerting the activation of Code Grey.
- Code Grey Alerts are to be issued by the DSS/DHS Operations Desk to the Code Alert Distribution List as soon as it issued, but not later than 4 PM on the day prior to the onset of Code Grey activation.
- DHS Operations Desk will input the activation into CARES.

Adult Services, SHS, and SHS Contracted Providers will coordinate the following sub-tasks:

1. Ensure that staffing levels are sufficient and deploy them to the field. (**Note:** This task does not apply to Adult Services)
  2. Identify and regularly **monitor clients who may be at risk for respiratory-related injuries** during hazardous air quality periods.
  3. Assist at-risk clients to voluntarily **come indoors** to facilities/locations that are **adequately cooled and well-ventilated**.
  4. Arrange for voluntary (or involuntary, as indicated) transport of individuals suffering from respiratory/pulmonary distress or cardiac difficulties to a hospital emergency department.
  5. Ensure there are sufficient **face masks** and provide both staff and clients with a KN95 mask (or similar) to reduce air pollutant/hazardous air exposure.
- All Outreach (OR) teams will submit their reports to the Street Homeless Solutions (SHS) unit by 8:00 AM of the day following a Code Grey. Reporting schedules may be altered if overnight operations are implemented.

## **Code Grey Operations – Outreach and Shelter**

For Outreach and Shelters, DSS Central and DSS/DHS will take the following steps for activating and coordinating Code Grey:

**Code Grey:** SHS teams will conduct regular outreach and engage with vulnerable clients at least once per shift and monitor throughout the duration of the code grey activation. They will also be expected to continue to monitor clients throughout the duration of the Code Grey activation. In addition:

- SHS subway teams will check on their priority stations at least once per shift during a Code Grey. They will also be expected to continue to monitor these stations throughout the duration of the Code Grey.
- All OR teams are required to submit a 24-hour coverage plan that ensures adequate staff coverage during Air Quality Emergencies with the most intensive coverage during daytime hours.
- All SHS OR teams will submit the Code Grey Report to DSS/DHS Emergency Management, Street Homeless Solutions, Adult Services, and Families with Children, and when needed, other stakeholders by 8:00 AM of the day following a Code Grey.
- SHS OR teams will be informed of NYCEM resources available during a Air Quality Emergency, such as face masks and access/information regarding drop-in centers, and offer these to clients they encounter.

## **Drop-In Centers and Shelters**

During an Air Quality Emergency, DSS/DHS conducts additional outreach to unsheltered New Yorkers and DSS/DHS drop-in centers. A well-ventilated space with appropriate air filtration and at the appropriate temperature for the season will be open to serve as many clients as possible. If the location is also serving as a cooling location, the designated space should have closed windows and the air conditioners must have proper filtration. Homeless individuals experiencing respiratory/pulmonary discomfort/stress are also able to access the designated cooling area at any shelter. During a Code Grey Emergency:

- During a Code Grey, shelters will not suspend, discontinue, or transfer from shelter any individuals currently in the shelter system. However, when necessary, and consistent with DHS policy, NYPD may still be called in order to protect the safety of clients and staff..
- During a Code Grey, clients can access any shelter, not only the client's "official shelter". The shelter will confirm with Vacancy Control to determine if a vacancy exists and, if so, the client will be given a bed. If no bed is available, the client will be given the option to sleep in a chair or be transferred to another shelter where an overnight bed exists.

- Shelters will make available any beds within the system to accommodate all clients brought in by outreach or those who walk-in during a Code Grey Emergency. All clients brought to shelter by SHS OR teams during a Code Grey will be engaged by shelter staff the following morning to encourage them to remain indoors using the available cool space and to access various services.
- Shelters will store clients' belongings overnight during a Code Grey.

### **Collaboration Among City Agencies & Supporting Community Organizations**

During a Citywide Air Quality activation, the following City agencies assist with identifying and reporting on homeless clients who are potentially at-risk for exposure (and involuntary removals, if appropriate):

- MTA – Metropolitan Transit Authority, NYC Transit
- NYC Parks Department-Parks Enforcement Patrol (PEP)
- NYPD - Homeless Outreach Unit (HOU)
- NYC DSNY - Department of Sanitation (for encampment cleaning)
- NYC DOT - Department of Transportation

As needed, the following City agencies and other organizations may be requested to assist with the identification and reporting on homeless clients who are potentially at-risk for exposure (and involuntary removals, if appropriate):

- NYC Department of Education-Division of School Facilities (DSF)
- NYC Health + Hospitals (H + H)
- Greater New York Hospitals Association (GNYHA)
- NYC Emergency Management: Public-Private Initiatives (for private sector building and property issues)
- New York Public Library Security & Emergency Management
- Brooklyn Public Library
- Queens Public Library

### **Hospital Emergency Departments**

During a Citywide Air Quality Emergency, hospital emergency departments throughout the city will accommodate street homeless individuals who walk-in or are brought by SHS OR teams. These individuals will be permitted to remain in emergency department waiting areas (or other spaces designated by the individual facility) for as long as possible and without being registered.

DHS can only request hospitals to assist with Code Grey as it is technically non-binding for hospitals to comply with. However, the DSS Health Services Office will send an annual letter to H & H and GNYHA requesting the cooperation with this policy throughout the summer season.

## **Potential Impacts**

### **Citywide Impacts**

Citywide impacts of reduced air quality events may include:

- Negative health impacts
- Healthcare delivery systems may see a surge in patients, especially those with chronic respiratory illnesses
- Increase in 911 calls and Emergency Department (ED) visits
- Day-to-day business, special events, school, and social activities may be interrupted due to voluntary or recommended closures
- Widespread public concern
- Activation of agency Continuity of Operations (COOP) plans
- Increase in worker illness and associated absenteeism

### **Health Impacts**

Long-term ozone and PM<sub>2.5</sub> exposures are responsible for approximately 2,400 deaths per year in NYC, and increased ED visits and hospitalizations for asthma, heart, and lung problems<sup>1</sup>. Repeated or long-term exposure to unhealthy air further increases both the morbidity and mortality of the exposed population. Fortunately, air quality events experienced in NYC would not qualify as long-term nor have been at a frequency to measurably increase mortality risk.

#### **Acute impacts may include:**

- Asthma and chronic obstructive pulmonary disease (COPD) attacks/exacerbations
- Shortness of breath
- Coughing
- Chest tightness
- Irritated mucus membranes
- Pulmonary inflammation
- Worsening bronchitis
- Respiratory infection
- Arrhythmias
- Heart attack

#### **Populations more vulnerable to health effects from smoke exposure:**

- Those with heart or respiratory conditions such as asthma or COPD
- Immunocompromised individuals
- Older adults
- Infants and children (especially young children) with heart or respiratory conditions or who are immunocompromised
- Individuals with social vulnerabilities, such as lack of access to safe housing or health care, lack of transportation, and other protective factors

## AQI CHART

AQI	Key Actions	Policy Decisions
<b>Unhealthy for Sensitive Groups</b> (101 to 150)	<ul style="list-style-type: none"> <li>Amplify air quality advisories and public messaging.</li> <li>Monitor 911 call volume and hospital ED status.</li> </ul>	<ul style="list-style-type: none"> <li><u>Special Events</u>: Event organizers serving only sensitive populations may consider rescheduling or moving indoors outdoor events that includes prolonged, intense activity.</li> </ul>
<b>Unhealthy</b> (151 to 200)	<ul style="list-style-type: none"> <li>Enhance public messaging, including targeted outreach to vulnerable populations.</li> <li>Consider coordination with healthcare sector partners to monitor impacts.</li> <li>Coordinate with transportation network partners on driver safety messaging, as needed.</li> <li>Monitor for impacts to airports and ferry services.</li> </ul>	<ul style="list-style-type: none"> <li><u>Childcare, Schools, Camps</u>: Reschedule or move indoors any outdoor activity expected to last more than an hour.</li> <li><u>Worker Health and Safety</u>: Agencies may use their discretion on implementing hybrid policies.</li> <li><u>Special Events</u>: Recommend all City events and outdoor, private events longer than an hour be moved indoors, rescheduled, or cancelled.</li> <li><u>Animals</u>: Activate horse work suspension at 150+ AQI.</li> </ul>
<b>Very Unhealthy</b> (201 to 300)	<ul style="list-style-type: none"> <li>Convene Air Quality Interagency call(s).</li> <li>Consider need for Situation Room or EOC activation.</li> <li>Enhance public messaging and outreach (i.e., press release, local elected outreach).</li> <li>Enhance homeless outreach.</li> <li>Coordinate with healthcare sector partners, including issuance of health alert to healthcare providers.</li> <li>Enhance outreach with transportation network partners, including driver safety messaging and need for bridges/tunnels/roadway closures.</li> <li>Monitor for impacts to airports and ferry services.</li> </ul>	<ul style="list-style-type: none"> <li><u>Childcare, Schools, Camps</u>: Reschedule or move indoors all unnecessary outdoor activities, including recess, field trips where children would spend more than an hour outdoors, afterschool, etc.</li> <li><u>Worker Health and Safety</u>: Agencies may use their discretion on implementing hybrid policies.</li> <li><u>Special Events</u>: Reschedule or move indoors all outdoor City events. Recommend outdoor, private events to be canceled, rescheduled, or moved indoors.</li> <li><u>Animals</u>: Limit time outdoors for all animals, regardless of their health status.</li> <li><u>Beaches and Outdoor Pools, Parks, Playgrounds</u>: Consider AQI, outdoor temperature, visibility concerns, and worker precautions in closure decisions.</li> </ul>
<b>Hazardous</b> (301 and higher)	<ul style="list-style-type: none"> <li>Convene Air Quality Interagency call(s).</li> <li>Activate Situation Room or EOC.</li> <li>Enhance public messaging and outreach (i.e., press conference, local elected briefings, community engagement, business community outreach).</li> <li>Enhance homeless outreach.</li> <li>Consider regional calls and/or messaging.</li> <li>Increase coordination of worker health and safety needs.</li> <li>Enhance coordination with healthcare sector partners.</li> <li>Enhance outreach with transportation network partners, including driver safety messaging and need for bridges/tunnels/roadway closures.</li> <li>Monitor for impacts to airports and ferry services.</li> </ul>	<ul style="list-style-type: none"> <li><u>Childcare, Schools, Camps</u>: Cancel or move all outdoor activities indoors. Consider providing remote education if forecasted duration of hazardous AQI is greater than one day.</li> <li><u>Worker Health and Safety</u>: Provide opportunity to work remotely to limit commuting time outdoors, when feasible.</li> <li><u>Special Events</u>: Reschedule all outdoor City events. Recommend outdoor, private events to be canceled, rescheduled, or moved indoors.</li> <li><u>Beaches and Outdoor Pools, Parks, Playgrounds</u>: Consider closure based on AQI.                             <ul style="list-style-type: none"> <li>Note: Consider temperature when making determination. Heat response operations should supersede curtailment.</li> </ul> </li> </ul>



## ACRONYMS

- AQI – Air Quality Index
- DSF - The Department of Education’s Division of School Facilities; management of school buildings that should be contacted if there are homeless encamped on school premises
- GNYHA - The Greater New York Hospitals Association
- HOU -The NYPD’s Homeless Outreach Unit
- OR - Outreach
- PEP - Parks Department’s Parks Enforcement Patrol peace officers
- SHS - Street Homeless Solutions

*Effective Immediately*

### Reference:

[NYC DOHMH Air Quality](#)

### Related Items:

[DHS-PB-2023-013](#)

[DHS-PB-2024-010](#)

DHS Code Blue Procedure

DHS Code Red Procedure