

COVID-19 Operational Guidelines

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Purpose: To educate National Apartment Association (NAA) members on the challenges associated with COVID-19 (commonly referred to as coronavirus) and provide guidance concerning daily apartment operations. Included you will find information for supervisors, employees and business units designed to help provide planning considerations to implement within your organization. Because this is a rapidly evolving and uniquely challenging situation and new information is constantly being released, it is advised you check the Centers for Disease Control (CDC) and your local health authority [websites](#) regularly for updates.

Applies to: All NAA members who are involved in managing apartments.

Overview: The Centers for Disease Control and Prevention (CDC) and World Health Organization (WHO) are closely monitoring the outbreak and spread of a novel (meaning new) strain of coronavirus (COVID-19). NAA understands that affiliates and members will have concerns about how apartment communities should address the virus to be prepared for incidents involving COVID-19.

It is important to recognize that NAA, its affiliates and individual members are not health care professionals. The CDC and other qualified health officials should continue to be the primary source of information and guidance. NAA is offering [guidance](#) for the industry, as well as insight and information from officials and experts.

Guidance:

1. **Communication** – Communication is as critical as preparation, and it's important to be factual and transparent when sharing information with employees, residents and suppliers. Your team should have a plan in place to relay information to all stakeholders during an outbreak. In emergency situations, employees will look to you for guidance and residents will feel more comfortable knowing you are prepared. Your communication should be calm and fact-based, with consistent frequency in real-time that aids your audience in understanding the situation.

2. **Leasing Office** — Notify residents to avoid physically visiting the office if possible, as this is a preventive measure that will help both residents and the onsite staff to stem the spread. Consider having employees work in the leasing office but encourage visitors by appointment only. Your company can define what warrants an appointment and prioritize accordingly. Prevent person-to-person contact whenever possible to include no handshaking. Posting signs and sending correspondence to residents and prospects prior to having interactions will encourage positive feedback. Cut back on unnecessary face-to-face meetings and instead encourage residents to speak over the phone or via email when possible. To further promote social distancing, encourage all residents to utilize their community website, resident portal and email for all service requests, rent payments and general questions, where applicable. It is also recommended to remove all refreshments from the leasing office.
3. **Resident Events** — To help prevent the spread of COVID-19, there should be a plan in place to address upcoming resident events. Property owners and managers can use their discretion in deciding whether to cancel or continue as scheduled. Because of recent federal and state/local recommendations limiting group gatherings, operators are encouraged to find alternative ways to engage residents through social media to keep the community connected. Examples of these events may include online book club, digital boardgames, daily trivia and virtual fitness classes. For more ideas, refer to [10 Ways to Keep Residents Engaged During Covid-19](#).
4. **Amenity Space** — To protect residents and employees from further exposure, owners have considered closing all amenity spaces for the foreseeable future. With this closure, use the time normally taken to maintain the amenities to perform sanitization and other preventive measures throughout the community, focusing primarily on access points and common areas. If owners insist on amenity spaces remaining open, consider reducing hours so proper cleaning can take place. In addition, limit the number of persons congregating in one amenity space in alignment with applicable federal, state, and local recommendations (the federal recommendation is fewer than 10 as of March 18, 2020).
5. **Touring Prospects** — In lieu of office traffic, management may consider moving all prospect tours to virtual tours using technology like Skype or FaceTime. You can even record videos of model or vacant apartments and post on YouTube. Then, share the link with prospects via email or text where authorized. For communities still accepting walk-in and appointment tours, consider accompanying the prospect to the model, but simply let them in and allow them to self-tour. If your community already has access to self-guided tours using a lock code on the model, continue to do so but ensure that proper cleaning measures are taken inside the model and on the door handle and code device. Practice social distancing, including refraining from handshakes or physical touching and remaining at least 3 feet away from prospects. Because of rapidly changing regulations and circumstances, it is extremely important to ensure that you remain compliant with Fair Housing Administration (FHA) and Fair Housing regulations. Any modifications you make to your process for touring should be applied consistently and be compliant.
6. **Service Requests** — Service requests should be considered with regard for the safety of maintenance employees and residents alike. To limit exposure, it should be considered to defer non-essential maintenance, resulting in only handling emergency or urgent issues as allowed by applicable law. Other items that may cease include pre-renewal inspections and standard interior preventive maintenance. Maintenance associates should wear disposable latex exam type gloves when performing service in an occupied apartment home and thoroughly wash their hands after completing any service. Additionally, please contact appropriate local counsel for questions concerning provisions in your lease documents that speak to the timeframe for service requests, your liability for not performing and excuses/relief from performance.

7. **Package Acceptance** — Follow the guidance of the local public health agency concerning package deliveries. If you currently allow delivery of packages in the leasing office, consider referring deliveries directly to the package recipients address. Packages should be left outside the apartment door to avoid contact with any self-quarantining resident. Consider using a third-party service to assist with deliveries. If your apartment community uses a program to monitor a package room or a locker system, continue using that system so employees avoid contact with any packages. If your protocol for package delivery is changing because of COVID-19, we recommend communicating these changes to your residents.
8. **Cleaning Protocol** — A strong focus by staff should be placed on sanitizing work areas, public areas and commonly touched places (door handles, elevator buttons, etc.) and placing hand sanitizers in common areas. The U.S. Environmental Protection Agency ([EPA](#)) released a [list](#) of EPA-registered disinfectant products that are qualified for use against this strain of coronavirus through the agency's Emerging Viral Pathogen program.
9. **Personal Protective Equipment (PPE)** — The CDC does not recommend the use of masks in non-health-care settings. However, it may be considered for such as like entering a resident's apartment for an emergency service request. Other personal protective equipment (PPE) includes disposable latex gloves and shoe covers. It is important to note that such supplies should only be used when necessary. Before deciding to use or make PPE available, be sure to review business policies for compliance with Occupational Safety and Health Administration (OSHA).
10. **Remote Work** – Employers may require or encourage employees to work remotely during the ongoing spread of COVID-19. According to the CDC, remote work arrangements are considered an effective infection control strategy. The CDC is encouraging employees whose job duties can be performed through telework to do so. Employees who are in high risk groups might request remote work as a reasonable accommodation to reduce their chances of infection. Not all positions will qualify for remote work, so it is best for each company to decide which positions are eligible and what the specific criteria will be for each. Contact your supervisor to determine whether this is feasible given your job responsibilities, as well as to evaluate alternative options. For more information, refer to [Guidance for Teleworking Amid COVID-19 Best Practice Document](#).
11. **Staffing Considerations** – Because of recent events, owners may want to consider making special provisions for the onsite staff. Scheduling changes may include limiting the number of onsite staff that works at one time or limiting office hours.
12. **Collecting Rent** — While rent collection should be continued in accordance with your lease agreement, we ask that you recognize that some residents have been or will be financially impacted by COVID-19 and you may consider working with those residents on alternate payment schedules, considering waiving late fees and providing financial resources to residents where applicable. To prevent continued exposure, residents should be encouraged to pay rent online if applicable at their community. Employees should handle all money collection with disposable gloves and wash their hands accordingly. If the leasing office is closed, a drop box or other method for money collection should be available for residents.
13. **Pending Evictions** – In light of extraordinary circumstances, HUD [encourages](#) public housing authorities (PHAs) and rental housing providers who serve rent assisted (Housing Choice Voucher (including Project-Based Voucher (PBV)), public housing and Indian Housing Block Grant (IHBG) residents to prevent the displacement of families through eviction. Some PHAs have gone so far as to issue eviction moratoriums for housing that falls under their jurisdiction.

Bear in mind that states and localities continue to push their own eviction moratoriums, applicable to all privately-owned housing. Nationally, more than 50 jurisdictions announced eviction moratoriums in light of the spread of COVID-19 with more considering legislation or mandate by judicial action or law enforcement. As stated above, see NAA's state and local research report to help you navigate this patchwork of mandates. It includes information on eviction, rent increase restrictions, late fees and shelter-in-place orders at <https://www.naahq.org/news-publications/guidance-dealing-coronavirus>.

14. **Resident Infection** – If a resident tests positive for the coronavirus and notifies the property owner or manager, the owner or manager should follow the CDC's guidance and work with local health officials. It is the responsibility of the health care provider, not the patient, to report cases of disease to health departments and the CDC. A notice to the community may go out in the event a resident or employee with a confirmed case and should be a business decision made with appropriate local counsel. Extreme caution is advised if choosing to make a disclosure because of privacy laws, and the person's identity to include name or unit number should not be disclosed.
15. **Shelter in Place** – When directed by government officials, residents can be ordered to remain in place at their homes to contain the spread of the virus, with exemptions as designated in the order. The shelter-in-place order also does not apply to those going to work in an essential business or essential government function.

Related Links and Forms

[CDC Interim Guidance for Businesses and Employers](#)

Sample Awareness Letter

Sample Maintenance Emergencies

Emergency Document for Essential Personal

About NAA

The National Apartment Association (NAA) serves as the leading voice and preeminent resource through advocacy, education and collaboration on behalf of the rental housing industry. As a federation of more than 150 state and local affiliates, NAA encompasses over 82,000 members representing more than 10 million apartment homes globally. NAA believes that rental housing is a valuable partner in every community that emphasizes integrity, accountability, collaboration, community responsibility, inclusivity and innovation. NAA thanks its strategic partners Maintenance Supply Headquarters and Yardi. To learn more, visit www.naahq.org.