

Off-Campus Student Housing Guidance

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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 for off-campus student housing.

The economic impact of COVID-19 affects all segments of the real estate sector, including the apartment industry. Student housing, in particular, is witnessing unprecedented challenges because of the confusion caused by university dorm and other on-campus housing closures. With nearly all universities moving to some form of online education, NAA would like to help clarify the role of off-campus student housing during this unique crisis. 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 off-campus student housing 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. **Resident Communication** — Communication is as critical as preparation, and it's important to be factual and transparent when sharing information with residents. Your team should have a plan in place to relay information to all stakeholders during an outbreak, including concerned parents of student renters. Your communication should be calm and fact-based, with consistent frequency in

real-time that aids your audience in understanding the situation. 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.

2. **Social Distancing** — It is advised that communities adopt relevant guidelines issued by the [CDC](#) and the [World Health Organization](#) and communicate all guidelines to your residents. In meeting those guidelines and to facilitate social distancing, many have temporarily closed most common areas – such as community gyms, social gathering spaces and recreational amenities. Policies and procedures should be put into place to limit face-to-face interaction with onsite staff while enabling them to continue delivering essential services to all residents.
3. **Financial Obligation** — 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. It is advised that communication is sent to all residents regarding upcoming rent payments and encourage residents that have suffered financially because of the outbreak to please contact your property manager. For residents who have not experienced an income disruption from COVID-19, it's important to help them understand that all existing rent and related obligations remain in place. 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.
4. **Lease Agreement** — Student housing communities have the contractual lease obligation to house students for the entire term of the lease, while students always have the freedom to physically occupy their apartments as they choose. It is not uncommon for residents to go home for extended time to include winter break, spring break and, in many cases, for the entire summer term, all while still leasing and paying rent for their college apartments. Lease terminations at private off-campus apartment communities should be included in the lease agreement if allowed. University closures do not influence this obligation.
5. **Roommates** — If you believe a resident has a sick roommate, have them contact their healthcare provider immediately, and continue following CDC-recommended cleanliness and social distancing guidelines. The healthcare provider will work with local health departments to provide additional instructions and manage the response to any suspected cases of COVID-19. In addition, rent payment from all lease holders is due on the first of the month. If leasing is done by the apartment (not by the bed), it is important to ensure the total amount owed is paid as all parties are contractually obligated to pay.
6. **Resident Events** — To help prevent the spread of COVID-19, there should be a plan in place to address upcoming resident events. 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](#).

7. **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 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.
8. **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.
9. **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.
10. **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

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.