



MANAGING YOUR PROPERTY IN THE **NEW NORMAL**

How to Build Your COVID-19
Operations & Maintenance Plan



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Executive Summary: Preparing for Your New Normal

As stay-at-home orders and business closures are lifted over the coming months, you are faced with a new challenge – how to manage your property, residents and employees safely in a world with COVID-19. With vaccination timeline presumed to be 12-24 months, the concern for COVID-19 will be a prolonged factor in your ongoing operations. This will require a long-term plan for how to mitigate the risk at your property and how to manage any positive cases on site.

To protect yourself from possible liability, the CDC recommends that every employer should have a written infectious disease response plan, implement prevention efforts and develop procedures to appropriately respond to positive cases. Creating a customized Operations & Maintenance (O&M) plan for the COVID-19 context will be a key tool to help you plan for the best way to care for your employees, residents, and property portfolio.

This plan is not intended to be a final plan. Expect and be prepared to make changes as necessary due to new federal, state, or local guidance, updated CDC guidelines, etc. It is best practice to assign someone with your organization to regularly review CDC, federal, state and local sites for updated guidance, and to communicate relevant updates to your organization. This is an evolving situation and your plan should evolve with the latest information.

Three Steps to Building your COVID-19 O&M Plan

This guide is intended to facilitate the creation of your COVID-19 O&M plan. Our hope is that this will provide a foundation for a valuable discussion among your team to prepare for the coming months. Outlined in the following pages are three essential steps:

- 1) Evaluate your property risk
- 2) Plan for ongoing maintenance and operations needs
- 3) Responding to a confirmed COVID-19 case

Please know that **this document is not intended to provide legal or HR advice**. It is imperative that you engage your legal counsel and human resources department to review your COVID-19 O&M plan. They will provide the necessary guidance to ensure that employee and resident rights are not violated and that all state and federal laws are complied with.

Key Questions to Consider

With any O&M plan, the three following questions should be considered:

1. How many re-occupancy O&M plans do you need for your portfolio?



As you work through the questions on the following pages, it will be clear that the O&M needs will likely vary between properties depending on the type of property, amenities, common spaces, locations, resident demographics, etc. As such, you may determine that you need several O&M plans for your portfolio. You have three options:

- Create an O&M plan to be used across all properties
- Create an O&M plan for each type of building
- Create an O&M plan for each specific building

You may need a different plan for different states, counties or municipalities. A plan that is appropriate for a Pennsylvania property may not be appropriate for a New Jersey property. Similarly, a plan for a property in rural Delaware may not be appropriate for a property in Center City Philadelphia. Be aware of the varying guidelines for each property's location to ensure the plan developed is as comprehensive and relevant as possible.

2. Who will need to comply with all or portions of your re-occupancy O&M?

This list may include employees, residents, visitors, suppliers, and/or contractors on site. As you create your plan, consider who will be impacted by each section. Ensure that it is designed with them in mind and plan for how it will be communicated to them.

3. Have you consulted legal and HR counsel for any regulations you need to be aware of and include in your re-occupancy O&M plan?

You may choose to engage with your legal and HR representative both before and after creating your O&M plan. Engaging them prior to drafting your plan will equip you with knowledge of what should be included, what can or cannot be done, laws to be mindful of, etc. You should always have your legal and HR representatives perform a final review of the plan before implementing it to ensure everyone is appropriately protected.



Step 1: Evaluate Your Property Risk





I. What Risks Are Associated With Your Building Type and Resident Population?

The degree of risk and your resulting efforts to reduce it will vary greatly based on the type of building. If you have multiple types of properties within your portfolio, you will want to consider your responses to the questions below within the context of each type.

BUILDING TYPE -----

1. What building types are in your portfolio?

- a. Layout
 - i. Midrise/high rise
 - ii. Garden style
 - iii. Townhomes
- b. Location
 - i. Suburban
 - ii. Urban

2. What state and local regulations do you need to consider for each location?

3. What amenities and common spaces are on site?

Do all properties of that type share the same layout and amenities (i.e. do all garden style properties have the same common spaces)? If not, you may consider creating a separate plan for each property, rather than each type.

- a. Community room/club house
- b. Fitness center
- c. Pool
- d. Mailroom
- e. Playground
- f. Front desk/lobby concierge
- g. Trash chutes or collection areas
- h. Other: _____



RESIDENTS & ON-SITE PERSONNEL

4. What is the risk level associated with your resident population?

As you know, certain demographics are at a higher risk of contracting or having complications from COVID-19. These include the elderly and those with compromised immune systems or with pre-existing health conditions. However, it is equally important to evaluate the occupational risk of your residents. For example, if you have residents who work in a healthcare setting, who provide medical transport or deliveries, or who work in densely populated office or retail settings, they are at a higher risk for contracting COVID-19.

Identifying the health and occupational risk level of your resident population is crucial to developing an effective plan. OSHA has developed a COVID-19 risk exposure pyramid to demonstrate the varying levels of risk, which are outlined below:

- **Very High:** Roles with a high likelihood of exposure to suspected or confirmed cases of COVID-19, often in a medical, lab or mortuary setting where “aerosol-generating procedures” or the handling of “specimens from potentially infectious patients or bodies” suspected or confirmed to be positive. It is unlikely that your property will fall within this category.
- **High:** Roles with a high possibility for exposure to suspected or confirmed cases. Examples include medical transport or healthcare delivery workers, healthcare support roles, etc. Again, it is unlikely that your property will fall within this category.
- **Medium:** Roles that result in frequent or close exposure to the public but who are not necessarily suspected or confirmed to be positive. Examples include roles that have frequent contact with the public, such as delivery workers, grocery store employees, people who work in densely occupied or high volume spaces.
- **Low:** Roles that do not require contact with people who may be infected. Examples include people who are working remotely from home or who generally have minimal contact with others.



Source: OSHA Worker Exposure Risk to COVID-19
<https://www.osha.gov/Publications/OSHA3993.pdf>

Consider your resident population and the following factors:

- **Age:** Do you have a large population of elderly residents?
- **Pre-existing conditions:** Have any of your residents disclosed any health conditions such as cancer, heart disease, diabetes, or anything else that results in a compromised immune system?
- **Occupation:** Healthcare workers or other professions at high risk for exposure (show OSHA occupational risk pyramid)



5. How many people are on site each day?
6. How many people are on site at the same time? (NOTE: this will change as the stay-at-home orders are lifted)
7. How frequently and closely do they interact?
8. Consider how and when common areas are used, how emergency or routine work orders are completed, or any other typical ways people may interact on site. The intent is to anticipate these interactions and mitigate the risk involved in them.

Where and why do they interact?

9. What and where are the high touch point surfaces within your property?
 - a. Can they be retrofitted to be touchless? (EX: foot operated door openers, arm operated door openers, etc. See Appendix A for possible solutions)
 - b. How can you reduce risk of transmission on these surfaces?

Examples include setting up hand sanitizer stations near each or providing employees or residents with hygienic door opener/button pusher key (see Appendix A for examples)



Step 2: Plan for Ongoing Maintenance and Operational Needs





II. How Will Your Management of the Property Change?

Now that you have evaluated the factors that impact building risk, you need to create a plan for how the building will be maintained and how general operations will continue. Below are a series of questions to consider when building your COVID-19 O&M plan.

HIGH TOUCH POINT SURFACES -----

1. How will the high touch point surfaces (from #8 above) be cleaned and sanitized on a regular basis?
2. How frequently will they be treated?
3. Who will be responsible for treating them?
4. How will the schedule and completion of treatment be recorded in the event documentation is required in a possible lawsuit?
5. What materials or equipment will you need for long-term ongoing treatment?

Be sure to consider what is currently in your inventory, what will need to be purchased, as well as what personal protective equipment or training your staff will need.

ENTERING & EXITING THE BUILDING -----

6. Will you implement a building entry protocol to reduce the risk of transmission?
7. Will you restrict who is permitted to enter the building? If so, who?
8. How will you restrict their entry?
9. Will you restrict entry points into building? If so, what will be your designated entry point?
10. Will you restrict exit points out of building? If so, what will be your designated exit points?
11. How will you mark you designated entry vs. exit points?
12. Are there any additional steps that will need to be taken by anyone wishing to enter the building? This may include a temperature check at the door, using a disinfectant station before entering, putting gloves and a mask on, calling the office to request entry, etc.



13. How will you communicate this new protocol to your employees, residents, and any visitors/vendors/contractors?

COMMON AREAS

14. Will you keep the common areas listed earlier closed?

A note on pool openings: As we head into summer, pools are a topic of concern. According to the CDC, “There is no evidence that the virus that causes COVID-19 can be spread to people through the water in pools, hot tubs, spas, or water play areas. Proper operation and maintenance (including disinfection with chlorine and bromine) of these facilities should inactivate the virus in the water.”

The CDC recommends that social distancing, careful personal hygiene, and elevated cleaning and sanitization should be practiced around pool areas to promote safety. For more information on how to promote water safety in light of COVID-19, please visit the CDC’s page for Water % COVID-19 FAQs (link provided in Appendix B: Sources & Additional Resources)

15. If you chose to open common areas, will you restrict the hours they are open? What will those hours be?

16. Will you limit the number of people who can use the space at the same time? What will that limit be?

17. How will you “ready” those spaces prior to opening?

Important Plumbing Note: If the space has drinking water or plumbing that has not been used, flush all systems with fresh water before opening to avoid secondary health concerns such as legionnaires disease.

18. What is your cleaning and sanitization plan for each area?

For example, a fitness center has more high touch point surfaces (handles, bars, balls, mats, etc.) than a lobby that has an entry door and elevators.

- a. What surfaces need to be treated in each?
- b. How frequently?
- c. By whom?

19. How will trash removal be handled in these areas? What extra precautions can be taken (frequency of emptying, PPE used when emptying, etc.)

20. If your leasing office has shared workspaces, how will you eliminate or reduce sharing of workstations?



MAINTENANCE & SERVICE REQUESTS -----

21. What service requests will be responded to?
22. Will any routine maintenance needs be postponed?
23. If so, what are the possible consequences of delaying service?
24. Will you maintain a full maintenance staff or will your number of maintenance staff on site at the same time be limited? What kind of capacity constraints does this cause?
25. How will you prioritize the backlog of work orders? For example, you could prioritize based on date received, urgency or severity, likelihood of consequential damage, or quantity of units affected.
26. What will prompt a relaxation of these limits in the future?
27. According to the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) and as referenced by the CDC, ventilation and filtration can reduce the airborne concentration of SARS-CoV-2, the virus that causes COVID-19. A reduction in airborne concentration results in reduced risk for transmission. As such, you will want to consider how you can adjust your HVAC system to provide optimal ventilation and filtration. Read more about ASHRAE's guidance by clicking on the link provided in Appendix B.

How will you adjust HVAC system and air handlers to provide as much ventilation as possible?

- a. How often will air filters be changed? (Staff should use proper PPE when doing so. The CDC recommends using the highest efficiency filters available for your HVAC system)
- b. Can you change system to "clean-to-dirty" directional airflow?
- c. How will this affect utility and maintenance cost? Are there any other impacts you need to consider?

LEASING AND UNIT TURNS -----

28. Will you offer virtual tours to reduce people on site?
29. What precautions will you and your staff take for in person tours?
30. What precautions will you ask the potential resident to take?
31. What different expectations or concerns will residents have when signing a lease? How will you respond to those concerns or expectations? For example, will you clean and sanitize the unit before and/or after the tour? Before move-in? Will you offer the resident a grace period to break the lease after move-in?



PERSONNEL MANAGEMENT -----

32. Will you continue the current designation between essential vs. non-essential on-site staff? If not, will you adjust that designation and what is expected of each?
33. Will certain members of your staff continue to work remotely? If so, who?
34. Will you adjust scheduling to reduce the number of staff onsite? If so, how?

Some companies are instituting stagger shifts, so some personnel are on site in the morning, while others are on site in the afternoon/evening. Others are implementing a weekday rotation when some staff work on site on certain days and at home for the balance of the week. For example, the Property Manager works on site on Monday, Wednesday and Friday, while Assistant Property Manager works on site Tuesday and Thursday.

35. How will you continue to use technology to work or communicate with staff?
36. What proactive procedures will you put in place prior to employees reporting to on-site work?

Examples include having your staff self-administer temperature checks each day or sign a document acknowledging their understanding of their responsibility to notify management of any health concerns immediately. Be sure to have legal and HR approval before implementing this.

- a. Will their results be reported to management to monitor compliance? If so, how?
 - b. How will it be recorded in compliance with HIPAA? (Please note that some HIPAA laws may have been altered for the COVID-19 situation, so consult your legal and HR professional)
37. What will your longer-term policy be for time off requested for illness or child or elder care?

Possibilities includes PTO, flexible work schedules, or assistance through FMLA, FFCRA, or short-term disability. Consult HR for guidance on what assistance is available and what classification requirements apply.

It is important that employees are encouraged to stay home if feeling ill or caring for a family member – do not pressure on them to report to work in these scenarios.

COMMUNICATION MANAGEMENT -----

38. How will you communicate the relevant sections of your re-occupancy plan to the following groups:
 - a. Employees
 - b. Residents
 - c. Visitors or resident guests
 - d. Suppliers and contractors



39. How will the initial plan be communicated?

- a. Who is responsible for communicating it to the groups above? (Note: You may have different people assigned to each group)
- b. How will it be communicated? (Phone, text, email, social media, signs, property portal, etc.)

40. How will any changes or updates be communicated?

41. Who will be responsible for communicated updates to each group?



Step 3:

Responding to a Positive Covid-19 Case





III. Develop Your Plan For What You Will Do If You Have A Confirmed Case On Site

All guidance from the CDC, EPA, OSHA, health departments and healthcare providers should take precedence over any other guidance received from other sources. Review the CDC, EPA, and OSHA resource links listed in Appendix B for more information. Be sure to also consult legal and HR professionals to ensure everyone involved is appropriately protected and rights are not compromised

This guide is not meant to replace guidance provided from those sources. This is intended to help facilitate your planning.

COMMUNICATION PROTOCOL -----

1. How should an employee report if they or someone in their household is suspected or confirmed to have COVID-19? Who should they report it to? When should they report it?
2. How should a resident report if they or someone in their household is suspected or confirmed to have COVID-19? Who should they report it to? When should they report it?
3. How should a vendor, contractor or visitor who was on site report if they or someone in their household is suspected or confirmed to have COVID-19? Who should they report it to? When should they report it?
4. How will management communicate to **employees** that they have been notified of a suspected or confirmed case? When and how will this be communicated?
 - a. What details (affected areas, next steps, temporary closings, plan to disinfect, etc) will be communicated? (NOTE: Be very careful to remain complaint with HIPAA. Review these parameters with legal counsel before distributing)
 - b. Who will be responsible for this communication?
5. How will management communicate to **residents** that they have been notified of a suspected or confirmed case? How and when will this be communicated?
 - a. What details (affected areas, next steps, temporary closings, plan to disinfect, etc) will be communicated? (NOTE: Be very careful to remain complaint with HIPAA. Review these parameters with legal counsel before distributing)
 - b. Who will be responsible for this communication?



TREATING THE AREA

When applying disinfectant for COVID-19, especially for a confirmed case, it is crucial that the individuals administering the treatment are properly equipped and trained. It is essential that whoever administers the treatment must use the proper PPE and follow the with proper donning, doffing, and disposal methods. They should use a disinfectant from the EPA N-list and follow manufacturer guidelines for dwell time and application to maximize efficacy. The CDC guidelines also state that anyone performing this work should be trained in the OSHA Bloodborne Pathogen standard.

As you evaluate the ability to use in house staff or the need to hire a professional, be sure to consider the CDC guidelines and the factors summarized above.

6. What is your reactive cleaning and sanitization plan?
7. Will you perform this work in house or hire a professional third party?
8. If using a third-party professional, who will you use?

If you are using a third party, it is highly recommended to have a contractor selected and pricing approved in advance. This will allow you to avoid unnecessary delays when scheduling service.

- a. Who can contact them? What approval is needed before calling them?
 - b. Do you have a contract?
 - c. When will they be contacted? (After a positive test? After a possible exposure?)
9. How will you determine which areas to treat?

Be sure to consider which areas are confirmed to have been exposed, which areas are likely to have been exposed, and which are unlikely to have been exposed. The impacted areas will likely differ depending on who the individual is. For example, if a maintenance technician is confirmed to have COVID19, it is highly likely they were in more areas in the building than if the infected individual is a resident)

10. What level of treatment (in-house vs. professional, reactive vs. proactive) in each area based on degree of exposure?



Appendixes for Additional Information & Sources





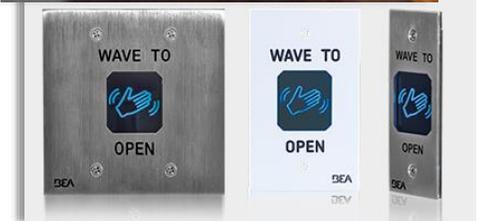
Appendix A: Retro-fit Product & Service Solutions

The products below are not endorsements or paid-for-partnerships. Rather, they are examples of product or service providers that you may consider engaging with. This appendix is meant to provide you a starting point to research your available options, so be sure to research any other providers you feel will best suit your needs.

Retrofit Options

From technological to simple, there are a variety of options that provide solutions to reduce the number of high touch point surfaces in your building.

- Touchless activation for doors - <http://www.wavetooopen.com/>
- Foot pull door openers - <https://www.stepnpull.com/>
- Arm pull door openers - <https://www.restroomdirect.com/sanitary-door-openers.aspx>



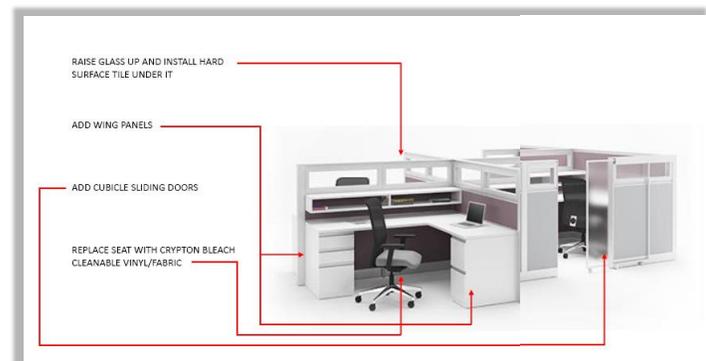
Office Furniture Suppliers

Most companies cannot afford to purchase new furniture. Ask your office furniture supplier, or any of those listed below, for their recommendations on how to reconfigure or add on to your existing furniture. Common examples are below:

- Acrylic or plexiglass partitions or screens for cubicles, desks, counters, etc.
- Cubical sliding doors, wing panels, wipeable panels
- Replacement of chair fabric for cleanable fabric or vinyl

Possible providers:

- Knoll - <https://www.knoll.com/>
- Kershner Office Furniture - <http://www.kershneroffice.com/>



KERSHNER Office Furniture
Enriching the Workplace



Touchless Tools for Personal Use

If retrofitting your touch points or reconfiguring your office is not a viable option, consider purchasing touchless keys for employees or residents. This will allow them to open doors, push elevator or phone buttons, or sign on electronic pads without touching the item itself. Some providers allow for customized branding with your logo or company name.

- CleanKey - <https://www.getkeysmart.com/products/cleankey>
- Branded Sanitary Key: <https://www.apbranded.com/product/touchless-black-acrylic-sanitary-key-69959/>





Appendix B: Informational Sources & Additional Resources

Below is a list of informational resources used to compile this guide and those which may provide additional value to you as you prepare to manage your property in a world with COVID-19. We strongly recommend you or someone from your team are assigned the responsibility to routinely check these sites for updates. The COVID-19 situation is rapidly changing as new information is learned. Information is key to making educated decisions and taking appropriate action.

American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)

- COVID-19 (Coronavirus) Preparedness Resources: <https://www.ashrae.org/technical-resources/resources>

Center for Disease Control (CDC)

- Coronavirus (COVID-19) Homepage: <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- Guidelines for Workplaces: <https://www.cdc.gov/coronavirus/2019-ncov/community/index.html>
- Water and COVID-19 FAQs: <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>

Environmental Protection Agency (EPA)

- EPA COVID-19 Guidelines: <https://www.epa.gov/coronavirus>
- EPA N List: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

Occupational Safety & Health Administration (OSHA)

- Guidance on Preparing Workplaces for COVID-19: <https://www.osha.gov/Publications/OSHA3990.pdf>
- Worker Exposure Risk to COVID-19: <https://www.osha.gov/Publications/OSHA3993.pdf>