

# Coronavirus Action Plan – Residential Properties

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Location:  
Effective Date:  
Revision Number: 1

**This is a sample Coronavirus Action Plan. It is not meant to be exhaustive or construed as legal advice. Consult additional insurance and/or legal counsel for professional advice. Please modify this action plan to meet your business needs, taking all relevant federal, state and local compliance requirements into account.**

To help slow the spread of COVID-19 and safeguard our staff, has created an action plan for responding to COVID-19. This plan, which is based on Centers for Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA) guidance, highlights the responsibilities of managers and employees, and outlines the steps is taking to address COVID-19.

## RESPONSIBILITIES

When it comes to ensuring a safe property during the COVID-19 outbreak, both property managers and employees have their roles to play. The following is a breakdown of the responsibilities for leadership and staff.

### Managers and Supervisors

Leadership, including managers and supervisors, should familiarize themselves with the details of the action plan. Above all, leadership must be prepared to answer questions from employees and set a good example by adhering to the guidance prescribed in the plan. This involves practicing social distancing and good personal hygiene.

### Employees

Employees play a critical role in 's COVID-19 prevention efforts. To protect everyone on the property, has a number of general best practices employees should follow:

- **Understand the signs and symptoms of COVID-19, and stay home if you are feeling sick**—Any employee who is experiencing symptoms of COVID-19 (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches, chills or fatigue) should stay home. Individuals experiencing such symptoms should also be instructed to consult guidance from the CDC on seeking medical care.
- **Practice good hygiene**—Employees should clean their hands often, either with an alcohol-based hand sanitizer, or soap and water. Hand sanitizers should contain at least 60%-95% alcohol, and employees should wash their hands with soap for at least 20 seconds. In addition, employees should avoid touching their face and cough into their arm.
- **Practice social distancing**—Social distancing is the practice of deliberately increasing the physical space between people to avoid spreading illness.

For specific employee safety protocols, click [here](#).

### Pandemic Response Team

The pandemic response team is a cross-functional team that recommends and oversees property protocols to control the spread of COVID-19. The team will include the following roles:

- **Manager**—**[Insert name of individual or department]** is responsible for the property's overall action plan. **[Insert name of individual or department]** is responsible for working with stakeholders and relevant health and safety bodies to manage this action plan.
- **Virus prevention and protocols lead**—**[Insert name of individual or department]** is responsible for recommending and developing protocols to ensure the wellness of all employees and residents. They are also tasked with overseeing procedures for isolating employees should they become sick at work.

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- **Sanitization and disinfection lead**—[Insert name of individual or department] manages logistics related to daily and periodic sanitation and disinfection efforts. Their responsibilities include ensuring that routine cleanings are completed and that the necessary cleaning supplies are readily available.
- **Communication lead**—[Insert name of individual or department] is tasked with managing any and all pandemic-related communications. They will work with human resources and internal communication stakeholders to ensure COVID-19 training is completed and that employees and their managers understand their role in preventing the spread of the disease. [Insert name of individual or department] will provide COVID-19-related updates on a [Insert frequency] basis and as needed.

## OPERATING PROTOCOLS

In order to keep staff safe and prevent the spread of COVID-19, requires the following protective measures:

### General Safety Policies

- will review the CDC guidance for businesses and employers to identify strategies to maintain operations and a healthy working and living environment.
- will develop flexible sick leave policies.
- will limit the presence of nonessential volunteers and visitors in shared areas, when possible.
- will limit staff entering residents' rooms or living quarters unless it is necessary.
- will clean and disinfect shared areas (e.g., exercise rooms, laundry facilities, shared bathrooms and elevators) and frequently touched surfaces.
- will identify a list of health care facilities and alternative care sites where residents with COVID-19 can receive appropriate care, if needed.
- will consider precautions related to maintenance requests. Nonessential maintenance may be put on hold. For pressing maintenance requests, staff will be provided with the proper protective equipment, and residents will be instructed to maintain at least 6 feet of distance while maintenance work is being performed.
- Employees who exhibit signs or symptoms of COVID-19 will be asked to not enter the property.
- Access to hand-washing stations and alcohol-based hand sanitizers will be provided to employees and residents. [Insert details.]
- will consider doing virtual tours of the property for prospective residents.
- Employees and residents can voice COVID-19 concerns by [Insert details.]
- will establish flexible work practices to reduce the number of individuals on the property during normal business hours.
- will place posters that encourage hand hygiene to help stop the spread of COVID-19 at the entrance of the property. [Insert details.]
- will increase ventilation rates in an effort to reduce the abundance of potentially harmful particles.
- will perform more frequent cleanings of common areas. [Insert details.]
- is aware that some employees may be at higher risk for serious illness, such as older adults and those with chronic medical conditions. To safeguard at-risk workers, we will take steps to ensure they have minimal contact with others. [Insert details.]
- is prepared to change our business practices if needed to maintain critical operations. [Insert details.]
- has identified alternate supply chains for critical goods and services. [Insert details.]
- will identify the communication platform (e.g., email, websites, hotlines, automated text messaging services, newsletters and flyers) to share the following information with staff and residents:
  - Guidance and directives from state and local officials
  - How the facility is helping to prevent the spread of COVID-19
  - How additional information will be shared and where to direct questions
  - How to stay healthy and what to do if they become sick

- How staff and residents can manage stress and protect others from stigma and discrimination related to COVID-19
- has contingency plans in place should absenteeism spike as a result of COVID-19. [Insert details.]
- In order to protect staff when working around residents, may provide:
  - **Gloves**—Employees may contract COVID-19 by touching contaminated surfaces and then touching their face. Gloves are an effective way to prevent COVID-19 from getting on an employee's skin. They are also a good reminder for employees not to touch their face.
  - **Face masks**—Viruses can be transmitted through the mouth via tiny viral particles known as aerosols. Face masks can help protect employees from these particles.

### Protocols for Workers

To ensure safety at facilities, employees will be asked to:

- Educate themselves on resident protocols and procedures.
- Notify their supervisor and stay home if they are experiencing COVID-19 symptoms (e.g., fever, cough or shortness of breath).
- Limit close contact with others, maintaining a distance of at least 6 feet when possible. Workers are encouraged to remind residents to maintain at least 6 feet of distance from workers and other residents. Above all, avoid job tasks that require face-to-face contact with others where possible. If this is unavoidable, employees will be provided with face masks and other controls to ensure their safety.
- Wear face masks where other social distancing measures are difficult to maintain.
- Refrain from sharing equipment. In instances when this is unavoidable, will provide alcohol-based wipes and other cleaning materials that employees can use to clean equipment.
- Practice proper hand hygiene. Wash your hands regularly with soap and water for at least 20 seconds. An alcohol-based hand sanitizer containing at least 60% alcohol can also be used.
- Avoid touching your eyes, nose and mouth whenever possible.
- Avoid contact with others whenever possible (e.g., handshakes).
- Avoid gathering when entering and exiting the property. Employees should also only enter and exit designated areas.

### Protocols for Residents

In order to protect residents as well as our staff, we will:

- Instruct residents to avoid physically visiting the leasing office, if possible. We will also encourage residents to utilize emails, portals and other channels for all service requests and general questions.
- Ensure residents are aware of COVID-19 symptoms, particularly those that require emergency care.
- Encourage residents who live alone to seek out a "buddy" in the facility who will check on them.
- Suggest that residents keep up-to-date lists of medical conditions and medications, and periodically check to ensure they have a sufficient supply of their prescriptions and over-the-counter medications.
- Instruct residents to follow the guidance and directives on community gatherings issued by state and local officials.
- Communicate our safety protocols and why we are taking specific precautions. This will be done using signage, social media and other available communication channels.
- Encourage residents to practice social distancing when in the property. Residents will be asked to maintain at least 6 feet of distance from staff via written signage or instructions provided prior to their visit.
- Place hand sanitation stations and wipes throughout the property, and encourage residents to use them frequently. Dispensers will be touchless where possible and will be located in lobbies, elevator landings, pool areas and exercise facilities.
- Encourage residents to use masks in common areas or where maintaining social distancing precautions are difficult.
- Encourage the use of touchless payment options for rent to minimize handling cash, credit cards and reward cards.
- Increase cleaning and sanitizing of all high-touch surfaces.

- Update messaging on our websites to educate residents on operational precautions.

### Protocols Regarding Common Spaces

To protect staff and residents in common areas, will:

- Encourage residents to wear masks in common areas.
- Consider canceling all public or nonessential group activities and events that may take place on the property.
- Arrange seating of chairs and tables to be least 6 feet apart.
- Consider limiting the number of individuals in an elevator at one time and designating one-directional stairwells, if possible.
- Ensure that social distancing can be maintained in shared rooms, such as television, game or exercise rooms.
- Make sure that shared rooms in the facility have good airflow. We will also work with building maintenance staff to determine if the building ventilation system can be modified to increase ventilation rates.
- Restrict the number of people allowed in laundry rooms at one time to ensure everyone can stay at least 6 feet apart.
- Provide disposable gloves, soap for washing hands, household cleaners and disinfectants registered by the Environmental Protection Agency (EPA) for residents and staff to clean and disinfect the following items found in laundry rooms:
  - Buttons
  - Knobs
  - Laundry machine handles
  - Laundry baskets
  - Change dispensers
  - Vending machines
- Post guidelines related to doing laundry safely during the COVID-19 pandemic.
- Consider closing exercise rooms.
- Consider closing pools and hot tubs, or limiting access to pools for essential activities only.
- Implement protocols for shared bathrooms:
  - Shared bathrooms will be cleaned regularly using EPA-registered disinfectants at least twice per day.
  - Bathrooms will be continuously stocked with soap and paper towels or automated hand dryers.
  - Trash will be emptied regularly.
  - Residents will be instructed that sinks could be an infection source and to avoid placing toothbrushes directly on counter surfaces.

### Additional Safety Policies

- **[Insert COVID-19 response protocols for specific aspects of your property's operations.]**

### Sick Leave Policy

- **[Insert policies specific to your property's operations.]**

### CLEANING AND DISINFECTING PROCEDURES

- The following items will be cleaned regularly:
 

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|---|---|
| <ul style="list-style-type: none"> <li>○ Door handles and push plates</li> <li>○ Public restrooms and related items, including:               <ul style="list-style-type: none"> <li>▪ Sink handles</li> <li>▪ Soap dispenser push plates</li> <li>▪ Towel dispenser push plates</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>▪ Trash receptacle touch points</li> <li>▪ Faucets and toilet/urinal handles</li> <li>▪ Stall latches</li> <li>▪ Sanitary receptacles</li> <li>▪ Baby changing stations</li> </ul> |
|---|---|

- Handles on beverage dispensers
- Thresholds and hand railings
- Elevator buttons
- Cleaning tools
- Buckets
- Telephones
- Office spaces and related items, including:
  - Computers
  - Office cabinet handles
  - Tables, chairs and other furniture
  - Counters and other surfaces
- Vending machine buttons
- Shared work vehicles
- Floors
- Telephones
- Safety latches and peepholes
- Light switches and thermostats
- Drapery pull handles
- Gym facilities
- Pool areas
- Common areas
- Stairwells
- Carpets
- Employees responsible for cleaning will be given the appropriate protective equipment. Cleaning should be completed using CDC-recommended products, including:
  - EPA-registered household disinfectants
  - Alcohol solutions with at least 60% alcohol
  - Diluted household bleach solutions (if appropriate for the surface)
- Trash will be collected from the property regularly. Those collecting trash will be instructed to wear nitrile, latex or vinyl gloves.
- HVAC air filters will be cleaned and disinfected regularly.
- Hand sanitizer dispensers will be refilled frequently.
- When an employee has tested positive for COVID-19, deep cleaning will be triggered and will ensure areas in which the individual worked are cleaned thoroughly. In regard to deep-cleaning practices:
  - will identify an approved external company to complete a deep cleaning of the facilities. This external company will be equipped with the proper training, permits and cleaning equipment to complete the task.
  - The pandemic response team will coordinate and supervise deep-cleaning efforts to ensure:
    - There is a specific plan and strategy in place, and that plan accounts for all machinery, equipment, common areas, tools and offices.
    - Authorized individuals are the only ones allowed access to the site during the deep cleaning.
    - Employees are aware of deep-cleaning practices.
    - The company contracted to perform the deep cleaning uses the appropriate PPE during the process and disposes of potentially contaminated items properly.

## EXPOSURE SITUATIONS

has response plans in place for situations when employees exhibit symptoms of or test positive for COVID-19.

### Employee Exhibits Symptoms of COVID-19

- The employee reports their symptoms to their supervisor, who then communicates that an employee is exhibiting symptoms of COVID-19 to the relevant parties (e.g., human resources).
- The employee is given a face mask and gloves, and is sent to a designated isolation room for further evaluation by the virus prevention and protocols lead or another designated individual. This evaluation will examine an employee's symptoms in more detail, flagging employees who are experiencing the following:
  - A fever of 100.4 F or higher
  - Shortness of breath or difficulty breathing
  - A cough

- A runny nose
- Muscle pain
- Tiredness
- If COVID-19 symptoms are confirmed, employees may be asked to go home and speak with their health care provider. will ensure employees are able to get home safely before dismissing them. If, after an evaluation, the employee is not exhibiting COVID-19 symptoms, they may return to work at the discretion of the virus prevention and protocols lead.

**Self-quarantining and Return to Work**

Employees who test positive for COVID-19 or believe they have been infected will be instructed to follow the advice of a qualified medical professional and self-quarantine. When self-quarantining, employees should:

- Stay away from other people in their home as much as possible, staying in a separate room and using a separate restroom if available.
- Not allow visitors.
- Wear a face mask if they have to be around people.
- Avoid sharing household items, including drinking cups, eating utensils, towels and bedding.
- Clean high-touch surfaces daily.
- Continue monitoring their symptoms, calling their health care provider if their condition worsens.

Notably, employees who are symptomatic or who have tested positive should not return to work until the conditions outlined in the table below are met:

| Return to Work Considerations  |   |
|--|---|
| <b>Employee was tested for COVID-19 and is symptomatic, or has had COVID-19 symptoms.</b>  | <b>Employee was tested for COVID-19 but has no symptoms.</b>  |
| <p>The employee may return to work if:</p> <ul style="list-style-type: none"> <li>● At least 10* days have passed since symptoms first appeared.</li> <li>● At least 24 hours have passed with no fever, without using fever-reducing medication.</li> <li>● Symptoms have improved.</li> </ul> <p>A test-based strategy is now only recommended by the CDC in certain situations, though recommendations from a local health care provider may vary.</p> <p>*In limited cases, persons with severe symptoms are recommended to extend their duration of isolation longer than 10 days.</p> <p>For current CDC guidance, click <a href="#">here</a>.</p> | <p>The employee may return to work if:</p> <ul style="list-style-type: none"> <li>● At least 10 days have passed since symptoms first appeared.</li> </ul> <p>A test-based strategy is now only recommended by the CDC in certain situations, though recommendations from a local health care provider may vary.</p> <p>For current CDC guidance, click <a href="#">here</a>.</p> |

When an employee tests positive for COVID-19, deep-cleaning procedures will be triggered. Furthermore, employees who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

**A Resident Tests Positive for COVID-19 or Is Suspected to Have COVID-19**

Should a resident test positive for COVID-19 or is suspected to have COVID-19, will:

- Have the resident seek advice by telephone from a health care provider to determine whether a medical evaluation is needed. Please note that residents are not required to notify administrators if they think they may or have a confirmed case of COVID-19.
- Provide the ill person with information on how to care for themselves and when to seek medical attention.
- Encourage residents with COVID-19 symptoms and their roommates to self-isolate and limit their use of shared spaces as much as possible. If possible, we will designate a separate bathroom for residents with COVID-19

symptoms.

- Minimize the number of staff members who have face-to-face interactions with residents who have suspected or confirmed COVID-19.
- Encourage staff, residents, caregivers and others who visit persons with COVID-19 symptoms to follow recommended precautions to prevent the spread.
- Instruct residents to follow CDC guidance on when to stop isolation.

#### **OSHA RECORDKEEPING AND REPORTING**

will adhere to OSHA-mandated requirements as they relate to recording and reporting certain work-related injuries and illnesses.

#### **QUESTIONS**

If employees have any questions regarding the content of this action plan, they should be instructed to speak with their supervisor. Furthermore, while the strategies highlighted in this document can protect workers from COVID-19, it's important to follow CDC guidance at all times. For more information, click [here](#).