



# Resuming Management and Occupancy Reviews (MORs)

## Inspection Protocols following COVID-19

The following proposed guidelines were created for Management and Occupancy Reviews (MORs) in Owner/Agent offices and at property sites to reduce exposure to the SARS-CoV-2 virus which causes COVID-19. The goal is to reduce exposure for WHEDA staff, Owner/Agents, and residents, to the extent possible. These protocols were created in conjunction with available resources from a variety of sources, including the CDC, Wisconsin State and Local governments, the National Council of State Housing Agencies, and other trusted sources.

**At this time, WHEDA is not performing MORs due to high COVID-19 concentration in Wisconsin.** MORs will resume once approved by WHEDA leadership and in congruence with other WHEDA Policies and Guidelines regarding COVID-19. Once approved, MORs will proceed unless WHEDA staff receives instruction to discontinue based on state-wide outbreaks, local hotspots, or other issues that may arise. WHEDA staff will continuously review the risks associated with MORs and, with leadership approval, postpone any MORs deemed unsafe.

### **Prior to Arriving at the Site:**

- MORs in high COVID-19 concentration areas (hotspots) will not be conducted. In addition, if the Owner/Agent indicates there is a high concentration or outbreak occurring at the site or WHEDA staff determines the review cannot be conducted safely, the review may require postponement.
- WHEDA staff and Owner/Agent staff with fever (temperature of at least 100.0), cough, shortness of breath, or flu-like symptoms will not participate in the MOR. In order to ensure this, if you are a WHEDA staff member or Owner/Agent participating in a review, prior to leaving home that morning you must:
  - 1) Take your temperature. If it is above 100.0 degrees, you may not participate in the MOR.
  - 2) Answer a series of COVID related questions. See attached Health Self-Check Form. If you answer “yes” to any of these questions, you may not participate in the MOR.
- WHEDA staff and Owner/Agent staff who have been exposed to someone who has the above symptoms or been diagnosed with COVID-19 in the past 14 days will not participate in the review.
- Owner/Agent staff will update WHEDA on any known health risks at the property as information becomes available, including any known information related to COVID-19 cases.
- Review of Training Materials listed below.

**Owner/Agent Requirements:**

- File reviews will be conducted in a space not shared by residents that has been sanitized with CDC approved cleaning agents. The Owner/Agent is responsible for locating, securing, and cleaning this space prior to the WHEDA staff arrival. This may require closing the space to residents the day prior and throughout the day of the review.
- Owner/Agent staff participating in the review and interacting with WHEDA staff will be limited to no more than two staff members for the entire day.
- Owner/Agent staff members are required to wear masks and keep six feet social distanced apart throughout the review. Time with the Owner/Agent will be limited to the extent possible.
- The Owner/Agent will be responsible for reviewing, understanding, and distributing the Resident Questionnaire as outlined in the “Physical Follow-up/Resident Questionnaire” section below.

**NOTE:** If the Owner/Agent does not comply with any of the above or WHEDA staff is required to reschedule due to the Owner/Agent being unprepared to comply, an Unsatisfactory Rating will be entered for the property and the development will be out of compliance.

**WHEDA Staff Requirements:**

- To protect the safety of WHEDA staff, Owner/Agents, and residents, below is the minimum Personal Protective Equipment (PPE) which WHEDA staff will wear while interacting with anyone on-site performing a review:
  - N95 face masks
  - Face shields or goggles
  - Disposable gloves changed or sanitized frequently OR
  - Frequent use of hand sanitizer or hand washing
- In addition to the above, WHEDA staff will have the following PPE available that may be used:
  - Gown/head/pants clothing covers
  - Foot covers
  - Disinfectant wipes
  - Microban spray
  - Strapped bag to carry and safely dispose of supplies during inspection
- WHEDA staff will receive training on proper fit, use, and cleaning of PPE equipment.



## WHEDA

- If the Owner/Agent has requirements that exceed the above, these must be communicated to WHEDA staff at least 7 days before the review date. The Owner/Agent will be responsible for supplying any additional PPE required.
- During the physical inspection, WHEDA will limit the areas that are touched. Disinfectant wipes will be used to clean surfaces that are touched and equipment that is used to touch surfaces in the common areas.
- WHEDA staff will maintain a 6-foot distance from residents and on-site staff, to the extent possible.
- WHEDA staff will not have contact with residents, to the extent possible. Residents who have concerns may address those with on-site staff or our Tenant Concern Hotline at 800-943-9430 or email at [TenantConcerns@WHEDA.com](mailto:TenantConcerns@WHEDA.com).
- Any WHEDA equipment, such as tester sticks, will not be shared with on-site staff.
- If gloves are used, they will be disposed immediately following the review.
- WHEDA staff will wash hands thoroughly or sanitize following the review.
- Entrance and Exit conferences will still be conducted; however, alternate locations such as an outdoor space or electronic conferencing methods may be used at the discretion of WHEDA and on-site staff members.
- WHEDA staff will take and dispose of any PPE they use during the MOR.
- Use hand sanitizer prior to entering vehicle. Use wipes to wipe down steering wheel, shifter, seatbelts and door handle.
- Spray/Wipe surfaces, clothing, etc. to disinfect, such as Microban Spray and/or disinfectant wipes.
- Bag or wash clothing worn during review daily.
- Dispose or thoroughly sanitize all PPE daily.
- Shower immediately, when able.

### Physical Inspection:

A physical “walk-through” will occur, focusing on a general assessment of each building and grounds of the property. Please see below for more detail.

- All common areas, mechanical spaces and exterior structure(s).
- All vacant units will be inspected, up to the required number of units.
- Occupied individual resident unit inspections **will not** be conducted.



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**Physical Follow-up/Resident Questionnaire:**

- For HUD-specific MORs, REAC Emergency Health and Safety (EH&S) follow-up will be accomplished by having the agent submit a copy of all work orders related to EH&S items identified in the most recent REAC report. In addition, HUD allows PBCA's to utilize direct calls to the residents to verify REAC follow up, if necessary.
- Verifying occupied units are in a decent, safe, and sanitary condition will be accomplished by a WHEDA-provided Resident Questionnaire that the Owner/Agent will distribute to tenants.
- The Owner/Agent will be required to send a current copy of the Rent Roll upon receipt of the Confirmation Letter for WHEDA Financed only developments. It will not be necessary for Tax Credit developments to send a Rent Roll in advance.
- Following receipt of the Rent Roll, if required, WHEDA will send a list of selected units to the Owner/Agent to distribute the Resident Questionnaires.
  - NOTE: The units selected for the Resident Questionnaire may not be the same as those selected for the file review.
- The Owner/Agent will distribute the questionnaire to the residents in the manner they are currently using to communicate with residents, which may include paper or email correspondence.
  - Collection of the returned forms will be in a manner acceptable to the Owner/Agent.
  - Residents will be required to return the questionnaire to the Owner/Agent no later than the day prior to the scheduled MOR.
  - The Owner/Agent is responsible for follow-up and collection of all questionnaires.
- The Owner/Agent will certify that they distributed the questionnaire to the residents and followed up for the return of the document.
- The Owner/Agent will complete a form to indicate the last time an annual inspection was conducted, when the next annual inspection will occur, and a brief summary of the current inspection and repair policy due to the COVID-19 pandemic.