



SUMMIT PROPERTIES : MODIFIED OPERATIONS POLICY
NOVEL CORONAVIRUS / COVID-19 PROTOCOLS
UPDATED: 04/03/2020

Purpose: In response to public health situations/emergencies such as COVID-19, our community operations practices shall be amended to reflect infection control safety protocols. The purpose of this Modified Operations Policy is to provide guidance to reduce the transmission of COVID-19.

Policy: Summit is committed to providing a home-like environment while prioritizing our residents' safety and welfare. Due to the very serious impact of COVID-19, we have altered our operations and visitation policies, modified activities to lessen exposure, added protocol for entering the community for staff/essential visitors, and established alternative communication methods in lieu of face-to-face visits. **This policy is being updated on a daily basis and is applicable to Summit's residential apartments and independent senior living communities only.**

Protocols:

1. **COMMUNICATION OF POLICIES AND PROTOCOLS**

- a. The Community Manager, or designee, will notify all residents and resident representatives of the provisions contained within the Modified Operations Policy.
- b. The Community Manager, or designee, will post clear signage at all entrances to ensure that all essential visitors and community staff follow the visitor policy, adhere to handwashing provisions, and are free from respiratory symptoms and fever, and will enforce these provisions during open office hours (which may be altered to respond to this emergency as necessary).
 - i. **Document: CDC Fact Sheet – What to Do If You Are Sick**
 - ii. **Document: CDC Fact Sheet – What You Need to Know About Covid 19**
 - iii. **Document: Summit Visitors Entrance Signs**
 - iv. **Document: Coronavirus Prevention Signs**
 - v. **Document: Wash Hands Sign**



vi. Document: Coronavirus Screening Questionnaire

- c. The Community Manager, or designee, will notify all residents and resident representatives of modifications to community rules and policies

i. Document: Coronavirus Resident Update #1 (3/10/2020)

ii. Document: Coronavirus Resident Update #2 (3/13/2020)

iii. Document: Coronavirus Resident Update #3 (3/18/2020)

iv. Document: Coronavirus Resident Update #4 (3/21/2020)

v. Document: Coronavirus Resident Update #5 (3/30/2020)

- vi. NOTE: Please check resident mailboxes to be sure they have picked up all notices. For all notices that have not been picked up by the resident within 48 hours please have maintenance staff slide the notice under the resident's door.

- d. The Manager, or designee, will notify all residents and resident representatives of their remote communication options (including phone calls and skype conversations).

2. VISITATION POLICY

Until further notice the Community will limit entry to only individuals who need entry ("Essential Visitors") and **greatly discourage all other visitors**. This policy will be revised in response to guidance from local, state, and federal health officials (Note that at the current time this is not a total ban on all visitors. The circumstances for the reasons for entry need to be taken into consideration. This is subject to change at any time. **Summit does not operate any senior care communities, which operate under greater latitude to implement full visitor bans**):

- a. **Entrances:** All visitors and vendors shall use the main entrance to the community. Signs shall be posted at each entrance informing visitors or vendors that they may be banned from further community access if they access from other entrances. This is necessary to ensure that non-essential visitors are not entering the community and to minimize the number of "touch" areas so that Summit's enhanced cleaning protocols are effective.

i. Document: Visitors Must Use Main Entrance Sign 03/17/2020

- b. **Definition of Essential Visitors:**

i. Visitation is limited to individuals needed to keep operations running and assure residents' needs are met; typically, this would include employees, health care and supportive service providers, physicians and nurse practitioners, contractors for essential work, healthcare consultants,



government regulators or other government officials, resident's immediate family/friends who need to visit for critical or time sensitive reasons. This includes immediate family visitors for residents with health conditions for whom these visits are a significant aspect of their treatment plan.

- ii. Routine social visits by family/friends **is greatly discouraged/curtailed until further notice.**
- iii. Example - Children on site with relatives or grandparents during school closures: Guidance at our independent senior communities at the current time is that this should be **strongly discouraged** due to the vulnerable nature of our senior residents. Please note that this may become mandatory in the near future so residents should be advised to look for alternate means of childcare.

c. **Entry Screening Required for Entry of Any Essential Visitors:** Of those individuals meeting the definition of Essential Visitors (including ALL vendors, visitors, and service providers) they must also pass the following screening questionnaire (verbal or written) confirming:

- i. they are free of respiratory symptoms, such as fever, sore throat, cough, new shortness of breath.
- ii. Not have a history within the last 14 days of travel to areas where a COVID-19 outbreak has been confirmed, including US communities where community spread has been documented.
- iii. Not been in contact with a novel coronavirus/COVID-19 infected person.
- iv. Not been to a health care facility where people with known novel coronavirus / COVID-19 patients have been treated.
- v. Have taken their temperature that day and confirmed it is less than 100 degrees.
- vi. NOTE: For communities without on-site management please post a notice informing visitors to postpone their visit if it is non-essential or if they answer yes to any of the screening questions and post screening questionnaires to be filled out by each visitor.

vii. Document: Coronavirus Screening Questionnaire

d. **Exception to Screening Protocol for Essential Healthcare and Service Providers:** If an Essential Visitor **responds yes to any screening questions, they should not enter the community unless they confirm:**

1. They are providing an essential service to the resident;
2. They have spoken to the resident and there is no other reasonable means of providing the resident with their essential service;
3. They will limit their visit to provision of the essential service and minimize other contacts while at the community;



4. They are symptom free and have confirmed they have taken their temperature that day and it registered less than 100 degrees;
5. The primary purpose of this exception is to allow residents to obtain critical support from health care or other works who may have risk factors but there is no other way to provide the resident with the support they require.

e. **Mandatory Procedures for All Visitors Granted Entry:**

- i. All visitors at the community (including staff and employees) are **required to wash their hands/utilize alcohol-based hand gel** upon entry to the property and frequently wash their hands/utilize alcohol based hand gel while in the building. Please follow CDC guidelines posted at your community.

- f. **Deliveries:** All deliveries must be left at the front entrance to the community unless exceptions are made for individuals with mobility issues or who otherwise require the delivery as part of their personal care plan

3. SOCIAL DISTANCING MEASURES

In accordance with CDC and other government guidance, Summit is enacting a number of social distancing measures applicable to all individuals at each community.

- a. **Eliminate Face to Face Interactions to the Greatest Extent Possible:** Per CDC guidance, Summit strongly encourages minimizing and eliminating all face to face interactions.
- b. **Necessary Face to Face Discussions should take place no closer than 6 feet apart:** This is in accordance with social distancing guidelines posted at each community.
- c. **Masks shall be recommended for everyone entering community:** Based on guidance from the CDC as of 4/3/2020, everyone entering the community should wear a mask (NOT an N95 mask which should be reserved for health care workers).
- d. **Office Hours:** All communications with staff and residents or vendors should take place via phone, skype, zoom, face time or other remote communication means to the greatest extent possible. In person resident office hours shall be eliminated until further notice.



- e. **Deliveries:** All deliveries to the community (other than resident deliveries) should be left outside the office door.

- f. **Community Event and Gatherings Policy:** Until further notice all group activities and events are be cancelled (this would include both Summit sponsored and resident sponsored events). This would include resident sponsored gatherings such as bingo nights, etc.
 - i. **Note on Enforcement:** Management will take steps to eliminate all gatherings of residents that violate social distancing guidelines, even where such gatherings are completely resident led (i.e. resident coffee hours). Managers should:
 1. Start by putting out notices to community and phone blasts and removing eliminating access to items that promote congregating (i.e. community puzzles, pool cues, common coffee pots, etc)
 2. Follow up phone calls / direct conversations with individuals who continue to violate social distancing recommendations.
 3. If necessary remove as many chairs, couches, benches necessary to minimize options for gatherings that do not follow social distancing.

- g. **Community Puzzles and Other Items:** All community puzzles and other items used by multiple residents shall be put away until further notice (i.e. community remote controls, other games etc.).

- h. **Meal Policy:** Any community with meal service shall only provide such service in “to go” containers. All common items such as salt/pepper shakers, water pitchers and other common dining room items shall be removed.

- i. **Common Areas:** Each community shall take steps to close down as much common area as reasonably possible, while maintaining a small amount of space for residents to utilize. Exercise rooms may be required to shut down at any time if necessary. The specific details of each common area closing (including whether areas are roped off or have furniture removed) shall be determined on a site by site basis in consultation with regional management. This is necessary to ensure that full cleaning and sanitizing can take place for all surfaces being accessed by residents and others.



- j. **Leasing and Showings Shall All Be Performed Virtually:** Effective immediately, all unit showings, tours, and other leasing activity shall be performed over phone and/or video. Plan to take photos or videos of your communities/apartments that can be shared with prospects over email. If you need to show an occupied unit, please work with the resident of that unit to see if they can take pictures of the unit and send them to you .

- k. **Lease signings, Unit Turnovers, Move Outs Shall Minimize Face to Face Interactions:** All move-in, move-out related activities shall minimize interactions, including move in and move out inspections shall take place via photographs and independent walk arounds of the apartment by residents. For step by step detail on

Document: Expanded Turnover Protocol dated 3/26/2020

- l. **Essential Housekeeping Services:** We have received questions on whether housekeeping providers are permitted to enter the community as “essential” services. Summit requests that until further notice housekeeping services only continue if they are part of the resident’s care plan or are otherwise necessary for the resident to maintain their apartment in a safe and sanitary condition.

4. STEPS TO REDUCE ISOLATION

Summit is establishing and encouraging community management to take steps, including use of electronic means of communications for residents, families, visitors to minimize any feelings of isolation/loneliness, including Skype, Zoom, FaceTime, etc. Summit regional management will work with Community Managers to provide the following:

- a. **Resident Happiness Committee:** Summit has implemented a committee to ensure each community is taking steps to help residents stay connected during this time. Steps thus far include:
 - i. **Resident Survey:** Surveys sent to all residents requesting input on ways Summit can help during this crisis. **See Resident Survey dated 3/23/2020**

 - ii. **Resident Phone Calls:** Each resident at Summit’s independent senior communities will receive a phone call from member of happiness committee checking in to chat and make sure they know Summit is here for them.



- iii. **Weekly Game and Activity Newsletter:** Committee will send out weekly newsletter with games, activities, and updates (through Golden Carers)
- iv. **“Unsocial” Visits:** Look for creative ways to promote a sense of community without face-to-face interactions. Some ideas include: Hire musicians to play music in the courtyard that people can listen to from their windows; Host a “live-stream” with music or talk on a subject of interest to residents; overall please be creative and collaborative and share your ideas with all of our communities!
- v. Resources for residents to learn how to conduct video chats (face time, skype, zoom, etc.). Some residents are already using these communication tools, and some are not. Residents who do not have a computer or smart phone can use the common computers where available and should be provided instructions for using these tools with proper sanitization in place.
- vi. Circulate ideas for residents such as getting outside along the walking paths, holding virtual cocktail hours, etc.

5. ENHANCED CLEANING PROTOCOL

Summit has implemented enhanced cleaning protocols at all communities with the goal of cleaning and disinfecting common areas and eliminating the spread of Covid 19 as set forth below.

- a. **HappyCo “COVID 19 Common Area Cleaning Tasks” Inspection template:**
 - i. This new inspection template has been added to each Community’s HappyCo template (Summit’s preventative maintenance software). The inspection template details the updated cleaning and disinfection scope of work at each community. **Each site’s Maintenance Supervisor shall confirm with Summit’s regional management team that this increased scope is underway.**
 - ii. Effective March 16, 2020, all maintenance staff at each site shall be responsible for completing the Covid 19 Common Area Cleaning Tasks **a minimum of 5 days per week** (and more if feasible based on vendor availability and other site-specific factors such as amount of common space) in one of two ways: 1) Vendor performs the cleaning tasks; or 2)



Maintenance staff is completing common area cleaning on the days that the cleaning vendors are not onsite.

1. On the days that the vendors are onsite please verify and fill out the first questions: “Vendor Completed Common Area Cleaning.”
 2. On the days that our maintenance staff completes the common area cleaning, each cleaning items on the list needs to be check off as completed once it has been cleaned.
- iii. The following items are on the inspection template:
1. Public Restroom Cleaning and disinfection, including wipe down of toilet grab bars and other touch areas;
 2. Clean and disinfect door hardware and light switches
 3. Elevator: Wipe down buttons of elevator panel, buttons outside the elevator and any handrails at the elevator;
 4. Front Main Entrance, Lobby and Mail Room
 - a. Wipe down all entry door hardware
 - b. Wipe down the entry intercom keypad
 - c. Wipe down any hard surface chair, bench etc. at the entry vestibule
 - d. Wipe down the mailbox door faces and the mail room countertops
 - e. Wipe down any lamp switches and light switches
 5. Management and reception office: Wipe down entry door hardware and any light switches and hand touch hard surfaces of desks and chairs.
 6. Common area “high touch” areas including common computers, exercise rooms, etc.

6. OPERATIONAL CONTINUITY MEASURES

In order to ensure that each community can continue to provide essential services in the event of employee sickness Summit has implemented an Interim Emergency Infectious Disease Continuity and Human Resources Plan. Please see the Plan for further details.

7. NEED FOR FLEXIBILITY WITH RESIDENTS SUFFERING ECONOMIC HARDSHIP

There is simply no way to predict the short or long term impact this pandemic will have on our tenants’ income or ability to meet their other financial obligations. There may be payment assistance available for residents who suffer income loss or other hardship, but it is likely that



some tenants will begin to have trouble making timely or complete rental payments. Please implement the following procedures in addressing tenant payment concerns:

- a. **Put all existing eviction proceedings on hold except those necessary for safety concerns:** Any evictions proceedings that are in process should be put on hold effective immediately and through May 31 at a minimum, and until further notice, with the exception of evictions pertaining to negligent or criminal behavior that jeopardizes the life, health, or safety of other residents.
- b. **Offer payment plans:** Summit typically offers payment plans on a case by case basis. If residents indicate an inability to pay rent, please offer payment plans with repayment periods up to 180 days. Please communicate with regional management before executing such plans and be sure that they are all in writing
- c. **Waive Late Fees:** Late fees for late payment of rent and other services shall be waived for a minimum of the next 60 days.

8. MAINTENANCE WORK ORDER AND PREVENTATIVE MAINTENANCE POLICY

- a. **All non-essential work orders postponed until further notice:** At this time our maintenance teams may only perform essential or emergency work, or other work that does not involve resident interaction. Summit will resume non-emergency work orders as soon as reasonably possible. Utilize the same guidelines as currently used by Summit for determining “emergency” work orders.
- b. **Procedure for essential work orders:** For all essential work orders, maintenance personnel shall follow the following procedures
 - i. **Questionnaire Before Entering the Apartment:** Each resident must respond to the 4 questions set forth above prior to Summit staff entering their apartment
 - ii. **6’ minimum distance between employees and residents should be maintained at all times in the apartment.**
 - iii. **Wear gloves and masks during the visit. Throw away gloves after visit.**



iv. **Always wash your hands when you are done**

- c. **Reduced Preventative Maintenance Scope of Work:** Effective immediately HappyCO has now been modified to only show essential PM work. Non-essential items are suspended until further notice (i.e. cleaning light lenses, etc.)

9. SELF-QUARANTINE AND POTENTIAL EXPOSURE RESPONSE

- a. **RESIDENT PRIVACY AND HIPAA:** Summit's senior communities are all independent senior living communities and do not operate under the same regulatory framework as nursing homes and other communities that provide healthcare. As such, Summit does not have the same authority to restrict visitors and does not have access to any healthcare information of our residents. The same is true at our family rental apartments. This means that Summit is not privy to any information pertaining to potential self-quarantines or other health related information at our communities and does not have any role in our residents' care plans. To the extent residents or their families inquire as to whether anyone at our communities is under self-quarantine or otherwise experiencing health concerns **please inform them that:**

- i. Summit does not have access to such information;
- ii. Would not be permitted to share such information;
- iii. Is not permitted to take any role in the monitoring or care of its residents; and
- iv. Summit is following available guidance from the CDC and our state and local health officials

- b. **Residents Who Inform Summit They Are Under Recommended Self-Quarantine:** To the extent residents inform Summit staff that they are under recommended self-quarantine (i.e. those who have recently traveled to areas with widespread, ongoing community spread) they should be advised to follow CDC guidelines including staying home for 14 days, taking recommended steps to monitor their health, and practicing social distancing. **Summit staff should not disclose this information to anyone other than employees who need to know as part of their job responsibilities.** Residents or family members who reach out for self-quarantine guidance should be directed to CDC guidance and to call their health professionals. For Summit's senior communities, if such residents have an option to self-quarantine away from the community, they should be encouraged to do so given the at-risk nature of the senior communities. However, under no circumstances should a resident be told that they are not permitted to return to their apartment or otherwise advised that they must quarantine off-site.



Such instructions and recommendations would only come from government officials.

- i. **Residents who request assistance with maintaining their self-quarantine:** Summit has offered residents help with minimizing their community contacts during self-quarantine, including vendor trash pickups from their doors so that they do not have to use the common laundry, meal deliveries, laundry service so that they do not have to use common laundry.

Document: Resident Update #5

- c. **Residents with Presumptive Covid-19 Case:** In the event that Summit becomes aware of a presumptive positive case of Covid-19 at one of our communities we will immediately reach out to our local, state and federal health officials for guidance, beginning with the CDC and applicable state health department. Summit's Continuity Plan would go into effect immediately.
 - i. Summit will inform the community and its partners as soon as possible after learning of a positive case at any community.
 - ii. If it is necessary to discuss an employee or resident's medical condition with certain individuals, conduct the conversation in private so it will not be overheard and limit the conversation to those that need to know.