



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, NW
Washington, DC 20240

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May 4, 2020

Memorandum

To: Regional Directors
From: Acting Associate Director, Park, Planning, Facilities, and Lands
Subject: Minimizing Risk of COVID-19 Exposure in Shared Housing

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In consultation with the National Park Service (NPS) Office of Public Health (OPH) and the Commercial Services Program, the Park Planning, Facilities and Lands (PPFL) Directorate developed the attached guidance *Minimizing Risk of COVID-19 Exposure in Shared Housing*. The guidance provides information to parks and concessioners to make informed decisions – in consultation with the NPS OPH and local/state jurisdictions and health departments – about the prevention of, response to, and mitigation of COVID-19 outbreaks in arrangements where two or more unrelated persons share a bedroom, bathroom, or a kitchen.

The Department of the Interior has issued guidance to ensure that tenant rent is not increased by the need to implement these guidelines. The WASO Housing Program will work with the regional housing points-of-contact to provide further information on rent and other housing program strategies consistent with current policies and procedures.

The guidance in this document will remain in effect until the end of the 2020 calendar year or until the state/local authorities in the jurisdiction of a park announce that the area is entering Phase III of the White House's [Opening Up America Again Guidance](#).

The attached guidance supersedes the following:

- *Minimizing Risk of COVID-19 Exposure in Concessioner Congregate Housing*, April 27, 2020
- Memorandum from the Director, Office of Public Health to the Deputy Director, Operations, on Public Health Recommendations Related to COVID-19, April 3, 2020

If you have any questions on the overall content of this memo or guidance please contact Jennifer Madello, Chief, Park Facility Management Division at 202-309-2379 or at jennifer_madello@nps.gov. Questions on how to implement this guidance within Housing Program policies should be directed to Jeremy Buzzell at 202-513-7027 or jeremy_buzzell@nps.gov.

Attachment

Cc: Chief, Park Facility Management Division
Regional Chiefs of Facility Management
Regional Housing Coordinators



Minimizing Risk of COVID-19 Exposure in Shared Housing

May 4, 2020

The National Park Service (NPS) recognizes that shared housingⁱ increases the risk of exposure to COVID-19. The health, safety, and well-being of employees, concessioners, volunteers, and partners is a top priority. We must protect our health so that we are able to care for our visitors.

A park’s ability to protect their employees in shared housing depends upon a number of risk factors. As a park’s exposure to the risk factors vary, decisions on how to safely use shared housing will be made at the local level. Though strategies may differ across parks, decisions at the park-level must be consistent between all tenants: employees, concessioners, volunteers, and partners. Moreover, parks should constantly monitor risk levels and mitigation strategies (e.g., if confirmed COVID-19 cases increase, the park must decrease operations).

To better understand the risk factors, all parks should consult their [Risk Assessment Tool](#).ⁱⁱ Additionally, this document provides activities parks can implement to prevent and respond to COVID-19 outbreaks (Table 1). Lastly, this document outlines a number of shared housing scenarios (Table 2) and the specific prevention strategies for each scenario (Table 3).

The NPS recognizes that reducing the risk of COVID-19 exposure requires limiting shared housing situations for the 2020 summer and fall operating seasons. Fewer tenants in shared housing means a reduction in the number of employees, volunteers, and concessioners. Reduced staffing levels will impact operations.

Prevention and Response/Mitigation Activities

All parks must follow guidance from the Centers for Disease Control and Prevention (CDC), the NPS Office of Public Health, and local/state jurisdictions and health departments. In deciding the level of risk to assume in using shared housing, parks, in consultation with the regional and Washington offices, will consider the activities in Table 1.ⁱⁱⁱ

Table 1: COVID-19 Prevention and Response/Mitigation Considerations for Shared Housing

Prevention Activities	Response/Mitigation Activities
<ul style="list-style-type: none"> • Prioritize housing for staff that support critical park needs • Provide alternate housing options for tenants who self-identify as high-risk • Use onboarding guidance to assess travel history and symptoms of COVID-19 prior to admitting new tenants into housing • Assign cohort style housing based on shared-risk categories (e.g., shared job duties and work crews assigned to the same housing unit) • Educate tenants on precautions they should take and ask them to abide by CDC guidelines (e.g., wash hands, maintain distances, avoid sharing items, disinfect surfaces, wear face coverings) • Educate tenants and staff to recognize the symptoms of COVID-19 	<ul style="list-style-type: none"> • Direct staff to stay home if they are sick • Conduct contact investigation (i.e., identify NPS and concessioner facilities where COVID-19 suspected or confirmed individuals worked and with whom they interacted) • Follow documented plan to support any tenant who must be quarantined or isolated • Provide food, supplies, and other supportive care for isolated or quarantined individuals • Transport infected individuals to a healthcare facility, if necessary

Shared Housing at a Glance

- 186 parks with shared housing
- 914 NPS staff residing in shared housing (as of April 8)
- At full occupancy, shared housing can accommodate more than 5,500 NPS staff
- Approximately 1,500 concessioners residing in shared housing (year-round)
- 16,000 concessioners reside in shared housing during peak season (80% of all concessioners)



Prevention Activities	Response/Mitigation Activities
<ul style="list-style-type: none"> • Provide personal protective equipment (PPE) and cleaning supplies for custodial staff • Provide cleaning supplies for tenant use • Use other available housing (concessions lodging or private market) • Establish a plan for quarantine and isolation facilities and how to service those facilities • Understand the capacity of the local health care system (inside or outside of park) to provide required medical treatment and hospitalization • Reassess risk on a regular basis 	

Shared Housing Occupancy Scenarios

As a park’s ability to prevent exposure and respond to and mitigate the transmission of COVID-19 in shared housing varies, park leadership must decide the level of risk to assume. The decision should be made in consultation with the regional and Washington offices.

Table 2 presents examples of housing scenarios on a continuum of increased risk. Table 3 explains the specific prevention and mitigation strategies that should be in place for a park to assume that level of risk. The more aggressive a park can be in their prevention and intervention measures, the more likely they will reduce transmission of COVID-19 in shared housing.

Table 2: COVID-19 – Shared Housing Scenarios

Housing Style	Scenario 1	Scenario 2	Scenario 3
<ul style="list-style-type: none"> • One tenant per bedroom • Multiple bedrooms share bathroom • Bathrooms are for individual use (no stalls) • Shared kitchen and common area 	Each tenant has own bedroom, bathroom, kitchen, and living room	Each tenant has own bedroom but shares a kitchen and living room. Bathroom sharing is limited	Each tenant has own bedroom but shares a kitchen and living room. Bathroom sharing is limited. There is high turnover and new tenants are frequently introduced
<ul style="list-style-type: none"> • Two or more tenants per bedroom • Multiple bedrooms share bathroom • Bathrooms have multiple stalls • No kitchen (cafeteria dining) 	Each tenant has own bedroom and bathroom	Each tenant has own bedroom. Bathroom sharing is limited	Each tenant has own bedroom but no limitations on bathroom sharing
<ul style="list-style-type: none"> • Bunkhouse style (no individual bedrooms) • Assuming running water, one shared bathroom per bunkhouse • No kitchen or common area 	One tenant per bedroom	More than one tenant per room but not full capacity, shared bathroom <i>This scenario should only be used in support of critical mission in remote area</i>	Every bed occupied, shared bathroom <i>This scenario should only be used in support of critical mission in remote area</i>



Scenario 1, in conjunction with the proper prevention and mitigation strategies, is the starting point all parks should consider when determining an approach to shared housing. Parks, at their own discretion and with strong prevention and mitigation plans in place, may elect to assume the risk associated with scenario 2. A park can only use the scenario 3 approach with prior approval from the Deputy Director, Operations or above. If a park is unsure about the level of risk for their unique housing programs, they should consult with the regional and Washington offices.

For each of the housing scenarios described above, Table 3 identifies the required prevention activities. If a park selects a scenario higher on the risk continuum, it must also implement the prevention strategies required lower on the continuum.

Table 3: COVID-19 – Shared Housing Prevention Strategies^{iv}

Prevention Type	Strategies for Scenario 1	Strategies for Scenario 2	Strategies for Scenario 3
Protection	<ul style="list-style-type: none"> - Provide gloves, face masks, and other necessary PPE to tenants and custodial staff - Promote proper coverage of cough and frequent hand washing with soap and water among tenants and staff - Increase ventilation - Provide non-touch takeout dining or deliver meals to resident’s room - Contact tenants prior to arrival to share expectations and preventative guidance - Recommend daily self-screening for fever and other symptoms and immediate isolation if they occur 	<ul style="list-style-type: none"> - Assign bathroom stalls, sinks, and showers to tenants (e.g., tenant in bedroom 1 can only use the first stall, sink, and shower) - Ask tenants to wear a face covering at all times when not in bedroom 	<ul style="list-style-type: none"> - Establish wait times between use - Evenly align use of showers, sinks and stalls amongst tenants
Distancing	<ul style="list-style-type: none"> - Eliminate visitors - Promote social distancing - Close common space 	<ul style="list-style-type: none"> - Stagger bathing schedules - Stagger use of kitchen - Rearrange work schedules to minimize mixing of individuals from different work areas 	<ul style="list-style-type: none"> - Increase spacing so beds are at least 6 feet apart - Convert common spaces to sleeping areas to spread out tenants - Arrange bunks so that individuals sleep head to foot to increase the distance between them



Prevention Type	Strategies for Scenario 1	Strategies for Scenario 2	Strategies for Scenario 3
Cleaning	<ul style="list-style-type: none"> - Increase frequency of cleanings done by park staff or contractors - Request tenants clean high touch surfaces (doors, elevators, etc.) between professional cleanings - Share CDC/EPA disinfection strategies 	<ul style="list-style-type: none"> - Ensure all tenants have adequate access to laundry facilities - Provide periodic professional cleanings per CDC guidelines - Provide cleaning products for tenant to clean and disinfect after each use 	<ul style="list-style-type: none"> - Require tenant to clean and disinfect surfaces after each use - Provide additional professional cleanings per day

Parks should continually reassess their risk tolerance for shared housing based on the rate of transmission, CDC guidance, and other factors (e.g., the release of rapid point-of-care testing, serological testing, therapeutics, or a vaccine).

ⁱ For the purposes of this document, shared housing is defined as any arrangement where two or more unrelated persons can share a bedroom, bathroom, or a kitchen. A small percentage of family units reside in shared housing.

ⁱⁱ InsideNPS.gov > NPS Coronavirus Response Information for Employees > Superintendents and Managers > Risk Assessment Tool.

ⁱⁱⁱ The considerations are based on the Quarantine and Isolation Risk Assessment sent by the NPS COVID-19 Incident Management Team to each park with an employee housing program. The results of the assessment, conducted in March, indicate that 28 percent of parks can support quarantine/isolation. Another 12 percent of parks may be able to support quarantine/isolation with some corrections and/or mitigation efforts.

^{iv} Prevention strategies taken from CDC guidance on [Cleaning and Disinfecting Your Home](#), [US Institutions of Higher Learning](#), [Retirement Communities and Independent Living Facilities](#), [Correctional and Detention Facilities](#), [Implementing Safety Practices for Critical Workers](#) and the [New York City Guidance for Congregate Settings](#).