



March 22, 2020

Mr. Christopher C. Krebs

Director

Cybersecurity and Infrastructure Security Agency (CISA)

U.S. Department of Homeland Security Cybersecurity & Infrastructure Security Agency

Washington, DC 20528

Dear Mr. Krebs,

On behalf of the more than 80,000 combined members of the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA), we write to urge you to update the CISA's "Essential Critical Infrastructure Workers" guidance document to identify the critical roles played by residential property management staff and residential construction teams. CISA rightly acknowledges that apartment communities are part of our nation's critical infrastructure. Yet we believe that in times of crisis, such as the COVID-19 outbreak, there is need for more clarity around operational needs and roles to ensure continuity across the multifamily industry. In particular, residential property management staff and residential construction teams both play an important role in supporting the millions of residents who are sheltering in place during the COVID-19 pandemic and their ability to live in well maintained multifamily properties during this crisis while also helping our nation recover from this crisis and our continued housing affordability challenges.

Rental housing operators provide homes for 40 million Americans and take seriously the responsibility to ensure our residents are safe and secure. As millions of individuals and families self-quarantine or shelter in place, it is crucial that front-line property management staff can maintain service in these communities, while carrying out those services or that work in compliance with CDC and state and local health authorities' Social Distancing Requirements. The presence of property management staff is critical during this crisis to ensure that residents who live in high-density apartment communities are protected from further spread of COVID-19 through sanitization of work areas, public places and commonly touched elements (door handles, elevator buttons, etc.) among other critical functions. For that reason, we urge CISA to designate that such operations and staff who conduct them will be deemed necessary to the operations and maintenance of "Essential Infrastructure," by the federal government.

In addition, CISA should also designate that workers that are involved in housing construction are critical infrastructure workers. There is a general consensus that our nation has an affordable housing crisis – both with respect to single family homes and rental housing. Our nation needs to build an average of 328,000 new apartment units annually through 2030 to meet demand from household growth and losses to the existing stock. We've only hit that mark three times since 1989. This crisis is only likely to be exacerbated by the COVID-19 emergency, as housing demand is as strong as ever

and continued construction is essential to addressing that shortage. Construction workers are essential to continue efforts to build housing units. If such workers are not appropriately excluded from shelter-in-place requirements, the production of affordable housing will grind to a halt and the affordable housing crisis would worsen. There have been several successful models of local ordinances that CISA may look to for guidance in allowing construction workers to be excluded from shelter-in-place requirements, such as the California State Public Health Officer's [guide to essential critical infrastructure workers](#) which specifically acknowledges the important role of those involved with housing construction.

Again, we urge CISA to confirm that multifamily operations and the staff needed to ensure continued access to the homes where millions of Americans are sheltering in place are deemed "Essential Infrastructure," by the federal government. This would also include construction, operation and management of housing.

The enormity of the challenge we face is evolving on a daily, or even hourly basis. As the problems mount, and as our nation continues to prepare for and respond to the COVID-19 outbreak, NMHC and NAA, representing our 80,000 members and the 40 million residents who call an apartment home, stand ready to assist our government in its work to protect American families.

Sincerely,



Douglas M. Bibby
President
National Multifamily Housing Council



Robert Pinnegar
President & CEO
National Apartment Association