

# SPECIAL CONVENTION PREVIEW

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## Is Your Disaster Program Compliant and Operationally Ready?

### Introduction

The global impact of COVID-19 has required property managers throughout the US to adapt quickly and recognize the importance of a robust disaster plan. These plans, when properly designed and implemented on a property, provide the tools necessary to empower employees and management to navigate a multi-dimensional disaster response.

Without a plan, incident responses are inconsistent, confused, and lacks continuity necessary to maintain the highest service standards. However, there is an additional complication in that it not only has to be operationally ready, it also has to be compliant to state, local, and sometimes federal, regulations. There is a strong distinction between these two, and it is worth exploring the application of both. However, a good analogy that helps to distinguish between the two is this: **the compliance plan is a decorative sword you hang over your mantle, but the operational plan is the one you take into battle.**

### Designing a Compliant Disaster Plan

The first element of a successful disaster program is ensuring that it is compliant with all appropriate laws and regulations. One of the major differences between this and the operational plan is the style. Compliance plans typically place a lot of information that are useful for regulators to know, but are unnecessary for responding staff, such as project timelines, introductory language, and regulatory compliance narratives. These elements of the program are typically outlined in long paragraphs and in an order as defined in the regulations and not based upon the immediate needs of staff in an emergency. For instance, it is possible that evacuation information and emergency activation are in two separate parts of a compliance document that could be as much as a dozen pages apart. However, in an operational document, these two sections should either be placed in juxtaposition, or merged completely. Compliance relies on more than just

filling out a form. Policy statements, procedural documentation, and map elements require meetings and coordination with local and state emergency preparedness documentation.

Property professionals who are part of a larger corporate entity have an even larger step in ensuring that site-specific information is appropriately attuned to larger umbrella policies from the corporate office. These should not be glossed over, as an even minor change to communication protocols can have a massive effect on notification, media, and resident-interactions during a disaster.

### **Designing a “Street-Ready” Disaster Plan**

Once you have a plan that masters the compliance piece of your disaster program, managers and their teams should develop a plan that can be deployed in a real emergency. Compliance plans, even well-designed ones, do not have the depth, detail, or sophistication to be deployed during a real activation. A comprehensive manufactured home disaster plan at a minimum contains three major elements: The Risk Analysis, the Emergency Response Plan, and the Business Continuity Plan. Each plan represents a separate phase in the emergency preparedness cycle.

### **Risk Analysis**

The Risk Analysis essentially asks one question: “What threats do we face?”. It should identify potential threats to your property’s operation in the categories of natural disasters (i.e.: hurricanes, COVID-19 etc.), technological disasters (i.e.: power outage, HAZMAT spill) and security emergencies (i.e.: terrorism, active shooters). While there is a temptation by experienced property

managers to simply do this by “gut” instinct or from past experiences, the Risk Analysis should be conducted by a multi-prong analysis of data from local, state, and federal sources. Neglecting to do so can miss critical threats. For instance, prior to 2020, few people had a real grasp of the potential for a crippling pandemic, even though the federal government placed pandemics in their National Planning Scenarios as early as 2003.

### **Emergency Response Plan**

The Emergency Response Plan is a comprehensive document covering every element of the initial response to an incident on property. This may be termed the “lights and sirens” phase of an emergency. It should cover evacuation, shelter-in-place, and lockdown of the property, and how to set up an emergency leadership structure. However, the plan must also address crisis communication, utilities, worker injuries, equipment, supplies and training. Most plans cover about 20% of what they really need to be effective and must be improved regularly.

### **Business Continuity Plan**

The final piece of a manufactured home disaster plan is the Business Continuity Plan (BCP), which is purely a recovery document. Any property will have multiple service processes (rent collection, service administration, common areas, etc.) that will require a comprehensive recovery examination. However, there are pieces of the BCP that should be incorporated into your Emergency Response Plan, because there are elements of recovery that also fit into a property’s initial response phase, such as recovering utilities and ensuring that generators

are set to automatically response during a blackout. **BCPs are highly technical documents and should NOT be written by laypeople.** They require technical expertise to develop operational recovery times and points that align with a metric of consequence of late recovery for both brick and mortar as well as Information Technology.

### **Conclusion**

Manufactured home management teams from small to large properties should develop and maintain a sophisticated disaster plan, which includes participation from an experienced Emergency Preparedness Specialist. This plan, if implemented properly, will provide property managers and their staff the tools to respond to any emergency they face. ■

Editor’s note: Patrick Hardy will be presenting a seminar with the same title at the WMA Virtual Convention & Sponsors’ Forum in October.

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