Mold and Water Intrusion Prevention Plan Outline for Building Owners and Property Managers

Risk Control Guidance
This outline for a Mold and Water Intrusion Prevention Plan gives you guidance on key elements and factors that should be addressed by building owners and property managers.

Use this information to develop your firm’s company-specific management plan and programs that are tailored to your properties. A comprehensive written document, sometimes referred to as a Mold Operations & Maintenance (O&M) Plan or a Water Intrusion Response Plan, should provide the basis for employee training, proactive programs, and appropriate responses to incidents.

I. Statement of Management Policy

This statement should highlight the significant program elements that a company has in place to address water intrusion and mold prevention. It should outline the purpose and applicability of the plan and tie together various prevention, risk transfer, training, and response protocols for mold and water intrusion. Company policy should be to take reasonable steps to prevent water intrusion events, to respond to events in a timely manner, and minimize the potential for mold growth, property damage and personal injury.

II. Roles and Responsibilities

The organizational structure should be defined, and include key in-house staff (and if appropriate, contractors) responsible for prevention of water intrusion and mold. Responsibilities must be clearly delineated and an internal hierarchy of communication should be established. At a minimum key staff would include:

- Program Coordinator - responsible for the overall implementation and effectiveness of the water intrusion and mold prevention program
- Property Managers - responsible for implementation and maintenance of programs
- Contractors – company expectations and roles of contractor personnel must be defined with regards to water intrusion, mold prevention, and response (this includes all third party managers, consultants and other subcontractors)

III. Procedures

Procedures must be put in place that define actions to be taken to control water intrusion and mold.

Construction/Renovation Procedures

- Pre-qualification of contractors should include a review of water intrusion and mold prevention programs and insurance coverages associated with design and construction phases.
- Building materials and spaces must be kept dry during construction and renovation activities.
- Inspection of building materials and routine inspection of the premises should be conducted throughout the life of a construction/renovation project.
- HVAC systems should be routinely operated to control temperature and humidity.
Preventative Maintenance
- A proactive program designed to prevent water intrusion and maintain the integrity of the building structure (roof, windows, doors, and other openings) and external drainage features is critical.
- Maintenance and cleaning protocols should be established for heating, ventilation, and air conditioning (HVAC) systems, plumbing systems, and general maintenance/housekeeping of building interior and exteriors.
- It is recommended that indoor spaces be maintained at a constant temperature above 65°F with relative humidity between 45% to 55%.
- A written preventative maintenance program should be in place to address key responsibilities, maintenance tasks, management systems and documentation.

Water/Mold Inspection
- Documented inspections should be conducted on a regular basis (quarterly at a minimum) so that the building is reviewed during various seasonal and operational conditions.
- Procedures for inspection protocols following severe weather events (thunderstorms, windstorms, ice storms, etc.) or power outages should be specified.
- During inspections, at a minimum the building interior and exterior should be examined for signs of water intrusion and mold growth. Crawl spaces, basements, and attics are common areas for water intrusion and mold.
- Unusual odors in indoor spaces may also be a sign of developing problems.
- HVAC and plumbing systems should be visually inspected for signs of damage, leaks or other problems.
- Inspection forms should be developed and utilized.

Response Protocols
- Mold abatement can typically be performed by trained in-house staff for areas involving less than 10 square feet, but professional vendors should be utilized when this is exceeded. Protocols for action should be specific as to when, and what type of action is required.
- A qualified contractor network should be established and available to correct the source of water intrusion immediately. Pre-qualified mold remediation firms should be utilized.
- Professional firms employing Certified Industrial Hygienists should be relied on to prepare an abatement and testing proposal.
- Generally, mold testing (air or wipe samples) does not need to be conducted until after abatement is completed.

Documented inspections should be conducted on a regular basis and after severe weather events

IV. Documentation of Complaints
- A Water Intrusion Event Form and a Mold Incident Report Form should be created to document tenant complaints, building impacts and corrective actions associated with each individual event.
- Reports should outline decision making and actions associated with water intrusion or mold events.

V. Responding to Claims
- If a tenant complaint or claim has been received or mold is discovered during inspections, a building owner should take appropriate actions to correct water intrusion problems or remediate mold as described in the plan and protocol.
- Notification must be made to insurance companies before undertaking work and accruing expenses associated with mold claims; however, emergency response actions necessary to prevent further property damage or bodily injury should be taken immediately.
- Insurance company claim reporting requirements should be clearly specified in the response protocols.

VI. Signing/Renewing Lease Agreements
- Building owners should work with legal counsel to incorporate standard language into lease agreements that address water intrusion and mold events.
- Lease agreements should outline tenant responsibilities and liability for maintaining temperature and humidity controls, performing visual inspections of the leased space, and reporting any problems throughout the lease term (including extended vacancies).
- Contract language should be monitored to avoid accepting liability for third party acts or omissions leading to mold problems.
Building owners may choose to address leasing issues and standard forms in plan sections on Roles and Responsibilities and/or Tenant Education and Communications.

VII. Tenant Education and Communication

In addition to lease language, supplemental educational materials are recommended for distribution to tenants at the time of signing the lease. Such materials should clearly delineate responsibilities for maintaining the tenant’s premises and immediately notifying building management of water or mold problems.

- Complaint and response protocols should include a standardized Tenant Notification Letter that acknowledges the water intrusion or mold event was investigated and appropriate corrective actions were taken.
- Mold prevention procedures and advice should be made available to tenants.

VIII. Staff Training and Annual Program Review

Internal staff training on water intrusion prevention and mold awareness should be completed to assure competent and qualified decisions.

- Training should be tailored to address the specific responsibilities, actions, and management protocols outlined in the O&M Plan.
- It is recommended that training for key management personnel be conducted annually, with a focus on lessons learned and what is or is not working.
- Training programs may also be expanded to third party property managers and other subcontractors.
- Annually, the Program Coordinator should update the O&M Plan and conduct a critical review of the implementation and adequacy of controls in-place.

IX. Remedial Action

- Basic procedures (including personnel protection and safety protocols) should be specified for in-house containment and initial clean-up of water intrusion or mold events.
- Clear delineation of remedial actions requiring outside expertise is also important.
- Response within 24 to 48 hours of water intrusion events is key to minimizing damage and preventing mold growth.

X. References and Resources

It is advisable to have sources on-hand as reference materials for response and management personnel. Materials could include contact information, sources of materials, pre-approved contractors, emergency response personnel, handbooks for response and cleanup, etc.

The XL Group companies provide this outline and information to help with development of your firm’s company-specific Mold and Water Intrusion Prevention Plan. This information should be reviewed in its entirety and tailored as appropriate to each company’s needs and operations.