



To: All FRVTA Members

From: Lance Wilson, Executive Director
Marc Dunbar, General Counsel

In an effort to clarify what seems to be the most commonly asked questions, the following guidance is being offered to assist FRVTA members.

First, the terms “essential business” and “essential industry” flow from generic guidance issued by the federal Department of Homeland Security and are intended to serve as guidance to federal, state and local officials as they deal with emergencies of all kinds. As it relates to the current health emergency, these terms are more refined by state and local officials via their emergency orders to deal with the practicalities of this pandemic.

Second as it relates to the generic “RV Industry,” the short answer is “No,” it is not an officially declared “essential industry.” However, the DHS guidance memos on what are “essential businesses” include several components of the RV industry which are guiding state and local officials in the drafting of their emergency orders.

As it relates to Florida, there is no state clearinghouse or application process presently through which you can receive determination or certification as an “essential business”. As there is no statewide “Shelter in Place” order or other executive order that broadly impacts RV businesses and their operations specifically, the local orders currently are governing these determinations.

Local governments, so far, are following the federal guidance and for the most part are holding the RV industry harmless in their orders. It is critical however that each business monitors and reviews their local government orders. **Once an order is issued curtailing the behavior of any public facing business, you should review the orders with the ownership and management team and consider consulting local counsel to guide your business on how the operations should be modified or curtailed to comply with the local order.**

While the FRVTA can provide general guidance, the actual application of these orders must be done on a business by business basis due to the simple fact that every operation is unique and so are the services delivered to the public. A campground, RV dealership and mobile service operation so far have fallen under different categories of emergency order “essential business” declarations by local governments. This trend is expected to continue.

The FRVTA team is doing its best to monitor the orders from the state and local officials and will provide updates to this guidance as it practically becomes available and necessary.

This information will also be placed on the FRVTA home page www.frvta.org