

Chapter 17

BED BUGS COMPLIANCE REQUIREMENTS

INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered the PHA's Bed Bug Plan. The PHA's Bed Bug Plan is incorporated into the ACOP as an attachment 17-1.

17-I.A. OVERVIEW

Our property is committed to managing pests using integrated pest management (IPM). IPM includes early detection of new infestations through regular inspection and monitoring, preventing pests by exclusion, design, and good sanitation, and taking appropriate control actions when necessary. Control actions may include cleaning and removing pests with a vacuum or trap. IPM principles are implemented by the most economical means and with the least possible hazard to people, property, and the environment.

To successfully eradicate bed bugs, we need to work together. We understand the following about property-wide bed bug control:

- Although bed bugs are not known to transmit blood-borne diseases, they stress people and can cause skin infections and allergic reactions. The Centers for Disease Control and Prevention (CDC) and the Environmental Protection Agency (EPA) classify bed bugs as a pest of public health significance.
- There should be no shame associated with having bed bugs in an apartment. Although clutter makes it more difficult to eradicate bed bugs, cleanliness cannot prevent the problem from occurring. Once an infestation has been identified, we will take steps to eliminate it and prevent it from spreading.
- Early detection and intervention is the goal of the IPM program. To reach this goal, the Housing Authority will inspect adjacent apartments with known infestations and monitor for pests in all rooms periodically during the year. In apartments without infestations, we will inspect them once a year. This process will involve asking residents and staff questions, visually inspecting, placing monitors, and possibly using other bed bug-detecting methods.
- Effective treatment requires the cooperation of residents and property staff. We will work to offer a minimal prep approach to bed bugs. If tenants cannot prepare for treatment, we may need to reach out to family or local support groups.
- Many people don't understand what must be done to eradicate bed bugs. If you feel that a resident, contractor, or property manager isn't handling the situation properly, suggest that they read PHA Bed Bug Plan and view the suggested resources.
- Management will make the following available for residents:
 - ClimbUp Insect Interceptors (or other monitoring devices)

- Bed Bug resistant mattress encasements
- Plastic bags for transporting clothing to and from laundry mats

17-I.B. NON-COMPLIANCE

The bed bug policy and treatment plan can only be successful when IPM team members (staff and residents) cooperate fully to eliminate bed bugs from the housing sites. When residents fail to cooperate or are determined to be non-compliant with the Bed Bug Policy or treatment plan they will be issued a warning letter on the first occurrence that explains that continued non-compliance will result in termination of the resident's lease. Non-compliance includes, but is not limited to, the following:

- Failure to be present at the apartment the day of treatment
- Failure to be ready on the day of treatment
- Failure to follow all instructions on drying clothes
- Improperly disposing of furniture prior to treatment
- Removing furniture prior to treatment and returning same furniture after treatment
- Removing or tampering with bed bug mattress encasements
- Using the bed bug mattress encasement as a bed sheet
- Tearing or destroying the mattress encasement
- Removing or tampering with bed bug interceptors or monitoring traps
- Failing to report bed bug infestations

If after the first non-compliance, the tenant is non-compliant for the second time the resident's lease will be terminated.

If at any time, an IPM team member (staff and residents), feels a staff member is non-compliant with the Bed Bug Policy or treatment plan they should report this immediately to the Executive Director. The Executive Director will investigate the claim and if found to be valid will take appropriate action with the accused staff member. The action may include a verbal or written reprimand, suspension or termination of employment.

EXHIBIT 17-1: HOUSING AUTHORITY BED BUG PLAN

Housing Authority Bed Bug Plan

Last Updated: May 13, 2016

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- Effective treatment requires the cooperation of residents and property staff. We will work to offer a minimal prep approach to bed bugs. If tenants cannot prepare for treatment, we may need to reach out to family or local support groups.
- Many people don't understand what must be done to eradicate bed bugs. If you feel that a resident, contractor, or property manager isn't handling the situation properly, suggest that they read through this document and view the suggested resources.
- Management will make the following available for residents:
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 - Bed Bug resistant mattress encasements
 - Plastic bags for transporting clothing to and from laundry mats

For bed bugs, the Housing Authority follows the IPM plan detailed below.

PREVENTION

- **Internal outreach efforts:** The Housing Authority will educate our housing community about bed bugs. Information includes pictures of bed bugs, where they like to hide, how to avoid bringing bed bugs home, and what residents should do if they find a bed bug. The following may be used to deliver the information:
 - Articles in the newsletter
 - Information on IPM shared during move-in and at annual re-sign
 - Flyers delivered to residents
 - Posters in common areas
 - Training sessions for staff and residents

- **External outreach efforts:** An infestation of bed bugs can begin from any number of sources. In public housing, common sources may include:
 - used furniture,
 - friends and family who are visiting or hosting residents; and
 - visiting professionals, such as home health aides.

To reach these various sources of bed bugs, the Housing Authority educates people in our community associated with these sources on how to avoid spreading bed bugs. The following may be used to deliver the information:

- Flyers delivered to agencies, residents, and visitors
 - Training sessions conducted by Housing Authority staff at resident meetings
- **Unit turnover and move-in procedures:** Staff and contractors working in vacant units inspect for bed bugs on items left by the former resident, around the unit, and behind fixtures, such as baseboards. Admission staff asks new residents about any previous exposure to bed bugs and provides information on how to limit the chance of bringing bed bugs to the property. Housing is not to be denied because of previous bed bug exposure, but management works with the resident to ensure belongings are moved into the new home without bed bugs. Bed bug monitors are offered to the resident at move-in. An inspection is scheduled within 90 days of move-in to inspect housekeeping and pest monitors.
 - **Disposing of large items:** Only items specified by the housing staff servicing the unit should be discarded. **In most cases, disposal of furniture is NOT recommended.** Residents should wrap infested items in plastic before moving them out of the unit and should destroy the items once they are outside, to prevent others from retrieving infested items and bringing them home. Any large item left outside for trash pick up is considered infested and will be promptly removed from the property. Property staff will destroy items on the curb using a utility knife or other means.

- **Reducing the likelihood of bed bugs in common areas:** It is difficult (but not impossible) for bed bugs to climb smooth surfaces like plastic and metal. Monitors are installed where possible and checked during routine pest inspections. Remember that everyone is at risk for getting bed bugs.
- **Preventing spread by property staff:** If office staff must meet with a resident in a unit, staff brings only essential items into the unit and will not sit on, or set items on, upholstered furniture. If maintenance staff must move infested items in a unit, they may wear booties and a disposable suit. They should remove and dispose of the protective clothing immediately upon completing work in the unit. When staff has completed the treatment of a unit, they will be required to leave work so they may change their clothes and take a shower prior to reporting back to work. The staff will be paid for this time. Any Housing Authority member who reports a bed bug infestation at their home residence can request a bed bug treatment by Housing Authority staff according to this IPM, free of charge.

EARLY DETECTION

- **Reporting bed bug evidence:** Residents, staff, and contractors must immediately report any bed bugs or evidence of bed bugs anywhere on the property to the Housing Authority maintenance secretary or the Project Manager.
- **Bed bug inspections:** Common areas such as lobbies and community rooms are visually inspected by Housing Authority staff as part of the regular weekly office cleaning. The staff visually inspects bedrooms as part of the routine annual physical inspections. At a minimum, Housing Authority staff member will inspect each unit and check the monitoring devices installed.
- **Bed bug monitoring:** ClimbUp Insect Interceptors are placed under each leg of beds and upholstered furniture in units with previous bed bug infestations. They capture bed bugs trying to get to or from the item. If no bed frame is present, Bed Bug ALERT monitors will be placed between the mattress and the box springs. Residents will be asked to consider purchasing bed frames to reduce the brooding grounds for bed bugs and allow the resident the opportunity to make their bed into an island. Residents may obtain ClimbUp Insect Interceptors or Bed Bug ALERT monitors from the office.
- **Making inspection easier by using mattress encasements:** A snug fitting fabric mattress encasement on the mattress protects the mattress. Residents may obtain encasements at the main office. If the resident has a bed frame, he or she should pad sharp edges that might tear the encasement. Mattress sheets should be used over the encasements to reduce the likelihood of tearing the encasement. Once installed on the mattress, residents should use duct tape to tape over the zipper pull to ensure that it remains fully closed. Beds must be “made into islands” to the extent that the room and furniture permit: keep the area under the bed free of clutter and pull the bed or mattress at least 10 inches away from all walls and bedside furniture. Bed skirts are discouraged. Although not required, light-colored bedding will make inspection easier.
- **Encouraging compliance with reporting pests:** A bed bug infestation can be stopped quickly and with minimal burden if all members of the IPM team (housing and residents) are involved early in the infestation. To promote resident compliance with inspecting

units and reporting infestations, we will not charge a resident for bed bug treatments or ask him/her to discard belongings unless it is absolutely necessary for effective treatment. If a resident does not comply with the staff's preparation instructions resulting in the staff not being able to treat the unit, the resident's lease may be terminated.

DOCUMENTATION

- **Identifying trends:** To better track the spread of bed bugs throughout our community, plan bed bug treatments, and gauge the success of our bed bug management program, bed-bug-specific records will include inspection findings, education efforts, and treatment details. The records are kept in the work order system and analyzed by the property manager at least two times a year to identify building-specific patterns of infestation.

TREATMENT

- **Confirming infestation:** Before any treatment is scheduled, live bed bugs or evidence of bed bugs must be found and identified by trained staff. Many pests can be mistaken for bed bugs. If no evidence of bed bugs is found, staff may, at their discretion, apply a preventive application of EcoRaider and install ClimbUp Interceptors and/or Bed Bug Alert Monitors.
- **Involving Staff:** Once an infestation is confirmed, a work order is written to treat the infested unit and inspect all adjacent units within three working days. Property staff works with resident and the resident's family or support service provider to ensure that everyone involved understands the preparation instructions (if any), any of the resident's medical issues that may impact the treatment plan and how to prevent future infestations. All expenses for the staff's work are paid for by management.
- **Planning the treatment:** After inspecting the infested unit and (when an active infestation is found) all adjacent units, the staff proposes a treatment plan, including heat treatment and pesticide product choice (if needed) to the property manager for approval. Treatment plans are approved after considering the burden on the resident, cost of service, and risk to people, property, and the environment.
Bed bug treatments: A bed bug treatment always requires at least three visits: the first is to inspect, plan treatment, and possibly do some pre-treatment; the second is to perform the main bed bug treatment; and the third is to follow up, kill emerged nymphs, or confirm bed bug control. More often, treatment requires four or more visits and may take months. The less team members cooperate, the longer the treatment will take. Control is defined as seeing no live bed bugs and the resident not reporting any new bites or sightings. Elimination is considered to be a 30-day period of control.
Discouraging use of store-bought pesticides: Insecticide "bombs", total release foggers, camphor, kerosene, diesel, gasoline, alcohol or other similar products are NOT effective for bed bug control. These products can cause serious health problems. They are dangerous if misused and can cause fires and explosions. These products are not appropriate for bed bug management.

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