



Bed Bug Control and Prevention Policy

Charter Street Office Copy

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Bed Bug Control and Prevention Policy

Purpose

Bed bug infestations have become a serious problem in housing throughout the country. The Salem Housing Authority (SHA) is not immune to infestations. This Policy was developed using criteria following the guidelines as prescribed in Notice H 2011-20 issued by the U.S. Department of Housing and Urban Development on August 16, 2011 and provides information regarding the prevention and control of bed bug infestations. It also provides guidance on the rights and responsibilities of the SHA and its tenants with regard to bed bug infestations.

Background

Bed bug infestations are a growing problem in SHA developments. Bed bugs are considered a pest of significant public health importance by the EPA and Centers for Disease Control and Prevention (CDC). Although the insects are not known to transmit disease, bites may itch and cause an allergic reaction in some people, which may lead to secondary infections. The presence of bed bugs can also cause stress or anxiety.

Experts suspect the resurgence is associated with greater international and domestic travel, lack of knowledge regarding the complex measures needed to prevent and control bed bugs, changes in pesticide availability and technology, and increased resistance of bed bugs to available pesticides. Bed bugs are not an indicator of poor sanitation, but excess clutter or hoarding conditions can provide them more places to hide, making early detection and targeted control difficult.

Prevention of Bed Bug Infestations

In an effort to prevent bed bug infestations from occurring in the first place, the SHA's efforts are:

- Raising awareness through education on the prevention of bed bugs (i.e.: training new staff, education of tenants at initial lease signing, tenant meetings as necessary);
- Inspecting infested areas, plus surrounding living spaces and common areas;
- Correctly identifying the pest;
- Keeping records- including dates when and locations where pests are found;
- Ensuring all items within a bed bug infested living area are cleaned;
- Ensuring the reduction of clutter where bed bugs can hide;
- Encouraging the elimination of bed bug habitats;
- Using pesticides carefully according to the label directions; and
- Following up on inspections and possible treatments.

In addition, the SHA will take the following preventative steps:

- Provide training for staff to identify bed bugs, and to perform ongoing prevention actions. When an SHA development is at high risk for bed bugs (for example if the development has experienced prior infestation), periodic building inspections will be performed.
- Actively engage tenants in efforts to prevent bed bugs. As historical data will support, education and involvement of tenants is a critical component of pest management of bed bugs. Bed bugs may often go undetected and unreported, because they are active at night and tenants may not be aware of their presence.

Responding to Reports and Addressing Infestations

The SHA will respond with urgency to any report of bed bugs. As per 105 CMR 410.820 (A) (k) the SHA will make contact **within 24 hours** when possible of a tenant report of bed bugs.

The SHA will provide the tenant with information about bed bugs “**Top Ten Bed Bug Tips**” issued by the EPA in both English and in Spanish (See **Attachments 1**) and discuss measures the tenant may be able to take in the unit before the inspection is performed. However, a bed bug inspection and, if necessary, corresponding treatment, may take time to schedule.

The SHA will endeavor to take appropriate action within a reasonable time period using the guidelines below:

- Following a report of bed bugs, the SHA (with 2 maintenance personnel) or a qualified third party trained in bed bug detection will inspect the dwelling unit thoroughly including mattresses, box springs, other furniture, baseboards, and other areas to determine if bed bugs are present.
- Low level infestations may escape visual detection. For this reason, detection tools such as Verifi Bed Bug Detector® or other detection devices that may become available may be utilized.
- Canine detection may be utilized to verify the presence of bed bugs.
- The SHA will inspect the unit reporting the infestation and no less than the surrounding apartments consisting of the units above, below, left, and right. These inspections will be completed that day.
- If an infestation is identified, photos of the infestation may be taken in order to document the level of infestation.
- When an infestation is identified, the unit and surrounding units will be treated for bed bugs accordingly.
- Treatment will begin **within 7 calendar days** of the inspection, when possible, although depending upon the form of treatment (chemical, heat, fumigation, etc.) and the level of infestation, this may not be possible.
- Chemical treatments may be necessary, but are not always reliable. Therefore, encasement, interception devices, vacuuming, steaming, freezing, fumigation, and/or commodity or building heat treatments may be utilized as part of the bed bug control effort.

- Infestations are rarely controlled in one visit. Effective treatment may require two to three visits, and possibly more. The length, method, and extent of the treatment will depend on the severity and complexity of the infestation, and the level of cooperation of the tenants.
- If it is determined that in the opinion of the licensed pest control professional that personal property cannot be treated using customary extermination practices, the tenant shall sign a “**Release**” (See **Attachments 2**). This Release will allow the SHA to remove and destroy such personal property in order to accomplish the extermination. This Release will hold harmless the SHA, its respective officers, directors, employees, and agents against claims for any and all damages associated with the destruction of this personal property.

Notification and Posting

As per 333 CMR Pesticide Board 13.00 Standards for Application, Section 13.08 Commercial Application of Pesticides to Indoor Settings (3) (b):

The applicator or his/her employer shall pre-notify all occupants of residential units between seven days and 48 hours prior to any application of pesticides to areas which residents occupy or have access. Pre-notification shall be made in writing and shall contain the following information:

1. Name and phone number of the company making the application;
2. Proposed date and time of application;
3. Locations to be treated;
4. Product names, EPA Registration Numbers, and active ingredients for the pesticide products that may be used;
5. Purpose of application;
6. Preparation procedures required by the pesticide label to protect items such as food, utensils, and pets; and
7. Department-approved Consumer Information Bulletin.

And (3) (c):

Prior to commencing each application, the applicator shall post a notice, approved by the Department, on all of the entrances of areas to be treated to which residents or others may have access. The applicator must leave these notices posted after the application. Entrances to units of individuals do not require posting.

The Salem Housing Authority will pre-notify in writing all occupants of residential units between seven days and 48 hours prior to any application of pesticides. The intent is so that individuals, who wish to avoid exposure or want to avoid encountering the applicator, may make necessary arrangements.

Notification and Posting for Common Area Treatment

When common areas (lobbies, hallways, community rooms, elevators, etc.) must be treated, **all tenants of the building must be notified.**

Additionally, the following written notification will be posted on all of the entrances of areas to be treated to which residents or others may have access:

Pesticide Notice in both English and Spanish (See **Attachments 8**),

Bed Bug Extermination: Chemical Treatment- Common Areas in both English and Spanish

(See [Attachments 6](#)),

[MDAR Consumer Information Bulletin Indoor Applications](#) (See [Attachment 9](#)).

These notices will be posted between seven days and 48 hours prior to any application of pesticides and will be left posted after the application.

Maintenance Department Responsibilities

PRIOR to extermination date:

The SHA will send the following information in both English and Spanish to the affected tenant(s) by mail or by hand delivery **between 7 days and 48 hours BEFORE any pesticide application** as applicable:

- The applicable Notice with preparation instructions for the type of treatment (chemical, heat, or fumigation) or inspection (K9) with date of extermination or inspection and other pertinent information:
 - **Bed Bug Extermination: Heat Treatment** (See [Attachments 3](#))
 - **Bed Bug Extermination: Chemical Treatment** (See [Attachments 4](#))
 - **Bed Bug Extermination: Chemical Treatment- Abutters** (See [Attachments 4A](#))
 - **Bed Bug Extermination: Heat/Chemical/Fumigation Treatment** (See [Attachments 5](#))
 - **Bed Bug Extermination: Chemical Treatment- Common Areas** (See [Attachments 6](#))
 - **K9 Bed Bug Inspection** (See [Attachments 7](#))
- The Salem Housing Authority's **Pesticide Notice** (See [Attachments 8](#)) when using chemicals.
- The Commonwealth of Massachusetts Department of Agricultural Resources **Consumer Information Bulletin Indoor Applications** (See [Attachment 9](#)) when using chemicals.

If determined necessary a maintenance person will deliver plastic bags to the tenant for laundry to be sealed in.

Check unit at least **one** day before the scheduled extermination date to ensure that the tenant has complied with ALL preparation instructions. If the tenant has not complied or is refusing, report it **IMMEDIATELY** to the Maintenance Operations and Facilities Manager, who will work with the Public Housing Administrator to seek assistance from family members.

DAY OF extermination:

AVOID cross contamination and re-infestation during the extermination.

Make sure that you wear the appropriate protective equipment i.e.; coverall suit, booties, gloves, shower caps, eye protection, and respirators when in the unit.

Remove and carefully wrap and dispose of your expendable protective gear (i.e.: coverall suit, booties, gloves, shower cap, etc.) before entering any "clean" areas of the building to avoid spreading the infestation. Change protective gear (coverall suit, booties, gloves, shower caps, etc.) as often as needed.

Do **NOT** take all supplies and/or the cart that you are using into an infested unit. Take **only** what you may need into the unit to avoid cross contamination and re-infestation.

Ensure that all vacuumed refuse and vacuum bags from infested rooms are disposed of in sealed plastic bags. Bugs and eggs can be trapped in vacuum cleaner brushes and hoses and can be spread throughout the building. If a vacuum cleaner is used, it must be treated with Bedlam Plus, Tempo Dust, and diatomaceous earth as trained.

The following are maintenance department instructions for the two most common types of bed bug extermination. The fumigation method may also be utilized as an additional option. The pesticide-licensed personnel will determine the appropriate method of extermination.

<u>HEAT</u>	<u>CHEMICAL</u>
Inform the tenant that all tenants and any pets must leave the unit now and stay out for a minimum of 8 hours .	Inform the tenant that all tenants and any pets must leave the unit now and stay out for a minimum of 4 to 8 hours .
Move furniture away from the walls. Remove cushions from furniture. Stand mattresses and box springs on end.	Move furniture away from the walls. Remove cushions from furniture. Stand mattresses and box springs on end.
Wrap and safely dispose of any items that the exterminator determines are beyond treatment.	Wrap and safely dispose of any items that the exterminator determines are beyond treatment.
<u>After the treatment:</u>	<u>After the treatment:</u>
Open the windows to help cool down the room. Put furniture back together and back into place.	Put furniture back together and back into place.
IF ANY TENANT IS FOUND TAKING DISPOSED ITEMS FROM THE TRASH, STOP HIM/HER AND REPORT IT IMMEDIATELY TO YOUR SUPERVISOR.	IF ANY TENANT IS FOUND TAKING DISPOSED ITEMS FROM THE TRASH, STOP HIM/HER AND REPORT IT IMMEDIATELY TO YOUR SUPERVISOR.

Recurring Infestations

The SHA may offer protective tools to tenants to help safeguard properties from reinfestation. For example, the SHA may offer to use monitoring devices such as Verifi Bed Bug Detector® or other detection devices that may become available. The SHA may require the non-chemical treatment of furniture upon tenant move-in at the tenants' expense.

The SHA will not charge a tenant to cover the cost of bed bug treatment.

Tenants Rights and Responsibilities

Tenants are strongly encouraged to immediately report suspicion of possible bed bugs in a housing unit or other areas of the property. Early reporting allows the pests to be identified and treated before the infestation spreads. Tenants are the first line of defense against bed bug infestations and should be encouraged to create living environments that deter bed bugs. This includes reducing unreasonable amounts of clutter that create hiding places for bed bugs, and regular checking of beds and laundering of linens.

Since bed bug infestation can cause health concerns, including physical discomfort, stress, and anxiety on the part of the tenants, the SHA will advise tenants of the following:

- The SHA will not deny tenancy to a potential tenant on the basis of the tenant having experienced a prior bed bug infestation.
- A tenant reporting bed bugs may expect expeditious response and attention by the SHA, but should be advised that inspection and, if necessary, treatment of bed bugs may take time to schedule.
- Following a tenant report of bed bugs, the SHA staff trained in bed bug identification (or third party pest control representative) may inspect any unit on the property to independently verify the presence of bed bugs. For the safety of tenants the SHA may invoke the emergency access provision of the lease and may enter the unit to perform these activities.
- If bed bug infestation is found in the unit, the tenant may expect treatment to begin within **7 days** of the inspection, though depending on the form of treatment, this may not be possible. Tenants should be advised that treatment may take several weeks.
- Tenants are expected to cooperate with the treatment efforts by allowing for treatment of personal belongings and refraining from placement of infested furniture or other items in common areas such as hallways. Tenant cooperation is shown to expedite the control of bed bugs and to prevent spreading of infestations.
- Under extreme conditions management may make staff available to help with moving and cleaning of furniture to accomplish the treatment effort.
- In accordance with Article 2 of 105 CMR 410.550 a tenant will not be expected to contribute to the cost of the treatment effort.
- Generally relocation from the unit is not necessary; bed bugs may cause discomfort but are not believed to carry disease. However, if reasonable temporary relocation is necessary, the SHA may arrange for it for those days when treatment is actively occurring that may render the unit uninhabitable. Any temporary relocation must be carried out in accordance with applicable civil rights laws, including, but not limited to, Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. For example, when persons with disabilities are temporarily relocated, they must be placed in housing that provides, at a minimum, the same accessibility features as the housing in which they currently reside. Additionally the SHA must ensure the right of return for tenants who have had to be temporarily relocated while the bed bug treatment is being performed.

- A tenant will not be reimbursed for the cost of any additional expense to the household, such as purchase of new furniture, clothing or cleaning services.

Record Keeping

The Maintenance department will keep records of:

1. Reports of bed bug infestations by staff, tenants, pest management professionals or government inspectors;
2. Responses to tenant complaints;
3. Recommendations and services of pest management professionals.

Additional Resources

Additional resources on bed bugs and the extermination of them can be found at:

Healthy Homes Training: *What's Working for Bed Bug Control in Multifamily Housing?: Reconciling best practices with research and the realities of implementation.*

http://www.healthyhomestraining.org/ipm/NCHH_Bed_Bug_Control_2-12-10.pdf

National Pest Management Association Bed Bug Hub:

<http://pestworld.org/pest-world-blog/the-bed-bug-hub-one-stop-shop-for-bed-bug-information>

National Pest Management Association Best Practices Website:

http://www.bed_bugbmps.org

Environmental Protection Agency:

http://www.epa.gov/pesticides/bed_bugs/

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