



U.S. Department of Housing and Urban Development
Ohio Multifamily Hub
200 North High Street
Columbus, OH 43215-2499
Telephone (614) 469-5737
Fax (614) 469-6879

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To: Ohio Multifamily Owners and Management Agents

From: William J. Graves, Director, Ohio Multifamily Hub

William J. Graves

Subject: Bed Bug Infestation Guidance

This memorandum sets forth new guidance on the rights and responsibilities of the Ohio Multifamily Hub, Ohio Owners and Management Agents, and residents in response to the resurgence of bed bug infestations within our communities.

As you know, we are responsible to ensure management policies allow you to conduct your business in an effective and professional manner that also fully protects the tenants' rights and remedies. We recognize your interest in developing policies to safeguard your property from recurrences of bed bug infestation. We also recognize residents also have a responsibility to comply with HUD requirements and the covenants of the lease. Appropriate bed bug prevention actions may be included in the property House Rules. Impacted residents are expected to cooperate with reasonable prevention and treatment efforts.

Owners/agents should also be mindful that bed bug infestation is not grounds for termination of tenancy in the same way that other pest infestation would not be grounds for termination. An owner/agent may not charge a tenant to cover the cost of bed bug extermination.

We are aware that bed bug treatment(s) can be more costly than treatments regarding other pests. In addition, we understand recurrence of bed bug infestation can increase the cost burden upon an asset. For that reason, if project funds are insufficient, we will consider **(on a case by case basis)** the use of residual receipts and/or reserve for replacement funds to eradicate bed bug infestation. Any permitted use of such funds must be consistent with the processes outlined in HUD Handbook 4350.1, Chapters 4 and 25, and the Ohio Multifamily Hub's minimum threshold policy on balances. Additionally, we **may** grant budget based rent increases earmarked for bed bug control and/or eradication. However, any request for a rent increase should be part of ongoing pest prevention and treatment program rather than a one-time expenditure for bed bug eradication. We encourage owners of properties restructuring with the Office of Affordable Housing Preservation (OAHP) to establish an escrow account for bed bug extermination. You may be required to execute detailed measures and/or implement specific procedures prior to an approval regarding the utilization of one or more of the aforementioned payment options.

Outlined below is information and references to best practices regarding the prevention and treatment of bed bug infestations. We will continue to work with you in a spirit of partnership and cooperation. If you have any questions, please contact your HUD Project Manger.

Prevention and Education

The education of all property stakeholders including on-site staff and residents is as important to eradicating bed bugs as having a qualified pest control professional treat the affected unit(s). Additionally, it is important to note that bed bug and other pest infestation cannot and will not be eliminated unless owners/agents work in partnership with residents.

Owners/agents are encouraged to:

- Develop and implement a pest management plan that promotes education and awareness, management and control, prevention and early detection for the owner/agent, on-site staff, residents, etc. Such a plan should include early detection/identification of new bed bug infestation, implementation of

appropriate abatement and or control measures, unit preparation, and proven extermination techniques using the **most economical** and **least hazardous** methods available.

- Routinely post flyers that provide factual information regarding bed bugs. Owners/agents should be aware that having bed bugs could produce an emotional reaction in residents. Bed bugs can be scary and/or embarrassing for some. For these reasons, the flyer should be prepared and delivered in a way that would not cause an alarm or discomfort.
- Encourage residents to report a problem when discovered.
- Regularly provide information during move-in inspections.
- Routinely provide information during annual re-certification.
- Inquire about bed bugs during periodic inspections and/or completion of work orders.
- Offer the appropriate assistance during the unit preparation, which occurs prior to the implementation of the extermination process.
- Collaborate with community based resident organizations, resident associations, or groups of interested residents (if no association exists) to host informational meetings regarding bed bugs and how to identify and/or detect them, etc.
- Establish and implement appropriate policies and/or procedures that are reasonable and do not penalize residents because they discovered and reported bed bugs within their unit.
- Consider that bed bug and other pest infestations may be circumvented at properties whose residents are fully informed, fully engaged, and watchful for pests and will take immediate action when they observe the first sign of pest/bed bugs infestation.
- The importance of having units inspected and treated as quickly as possible should be stressed to all residents. When residents report that they have bed bugs in their unit, owners should first inspect the unit and confirm that the pest is in fact bed bugs. If confirmed, owners should immediately begin taking the appropriate steps to treat the problem.

Suggested Procedures Subsequent to a Resident Reporting Bed Bugs

The importance of having units inspected and treated as quickly as possible should be stressed to all residents. When residents report bed bugs in their unit, owners should first inspect the unit and confirm that the pest is in fact bed bugs. If confirmed, owners should immediately begin taking the appropriate steps to treat the problem. These steps include but are not be limited to:

- Inform residents not to treat the unit for bed bugs themselves and not to discard beds, furniture or other personal items that may be contaminated;
- Optimally, encase mattresses and box springs in identified units;
- Explain to the residents the importance of vacuuming, cleaning and getting rid of clutter to eliminate places for bed bugs to hide;
- Notify all residents and applicants that bed bugs have been found in the building; and
- Inspect and treat if necessary not only the affected unit, but also all units surrounding that unit (a 360 degree inspection/clover leaf inspection).

Bed Bug Links

HUD Office of Healthy Homes: <http://www.hud.gov>

How to select a pest control company EPA:
<http://www.epa.gov/bedbugs/#hiring>

National Pest Management Association:
<http://www.pestworld.org/exterminators/tips-for-finding-a-pro>

Bed Bug Central: <http://www.bedbugcentral.com/learn/index.cfm/how-to-choose-a-pest-controlcompany;>

CDC web information: <http://www.dpd.cdc.gov/dpdx/HTML/Bedbugs.htm>

Ohio State University Fact sheet: <http://ohioline.osu.edu/hyg-fact/2000/2105.html>

OSU Housing link: <http://moritzlaw.osu.edu/shlc/docs/bed-bugs.pdf>

Central Ohio Bed Bug Task Force: <http://centralohiobedbugs.org/>