



U.S. Department of Housing and Urban Development
Chicago Regional Office, Region V
Office of Multifamily Housing
77 W. Jackson Boulevard
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March 15, 2011

MEMORANDUM FOR: Owners and Agents

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FROM: Edward J. Hinsberger, Director, Chicago Multifamily Hub, 5AHMLA

SUBJECT: The Reemergence of Bed Bug Infestation within Our Communities

This memorandum is being issued by the Chicago Multifamily Hub in response to the noticeable return of bed bug infestations within our communities. There is a lot of available information regarding bed bugs that is easily obtainable from the internet and other sources. In fact, there is so much information that it may sometimes be a bit overwhelming. For that reason, the basic intent of this memo is to offer fundamental information and provide links to effective informational sources pertaining to the identification, prevention and eradication of this apparent problem. Additionally, we will attempt to offer suggestions and/or recommendations, which may be utilized as you begin to develop, modify, and implement your respective policies and procedures to address this most urgent issue.

Bed Bug Basics

The existence of bed bugs within the U. S. declined to near extinction several decades ago. However, the ban of several unsafe insecticides coupled with the increase of global travel have aided in their reappearance. The proper course of action for you to take at your respective properties may be unclear as many myths about bed bugs persist. Consequently, George Gilmore of my staff, in consultation with representatives from federal and local government agencies, resident and community organizations, housing and industry partners, non-profit and pest control entities, etc. has assemble some basic facts that can assist owners in navigating through the seemingly endless mounds of information concerning bed bugs.

The common bed bug (*Cimex lectularius* Linnaeus) is a parasite which lives on the outside of the body of the host. Bed bugs will feed only on the blood of warm-blooded hosts. They can conceal themselves in tight cracks and crevices and are often found in bed parts, such as mattresses and box springs. They can also hide behind baseboards, folded areas of beds, bedding, adjacent furniture, electrical switch plates, picture frames, wallpaper and nearly anywhere inside a home, car, train, airplane, bus, or shelter, etc. Unlike cockroaches, bed bugs travel by hitchhiking, commonly taking a ride on a human host from one place to another in a suitcase, briefcase and on clothing, etc. Bed bugs usually feed at night but can take a blood meal during the day, especially in heavily-infested areas. They usually require 5-10 minutes to engorge with the host blood. After feeding, they move to a secluded place and hide for 5-10 days. During this time, they do not feed but instead digest their meal, mate, and lay eggs.

Bed bugs are excellent hitchhikers and can be transported to your home or place of business, etc. from literally any place and by anyone that has been in contact with the pest. For example, bed bugs can be introduced to a property by simply hitchhiking on the clothing or belongings of residents or visitors. Additionally, bed bugs could conceivably be introduced to a property by the owner, agent, on-site personnel, contractors, vendors, government representatives, etc. In effect anyone who has or had access to a property. Simply stated, no one is immune from transporting these pests from one location to another. For that reason, it is very important to understand that it is virtually impossible to prove fault with regard to who may have created the bed bug infestation within a property. Consequently, I wish to impress upon you that residents should not bare the sole burden regarding the introduction of bed bugs to a property. Additionally, I want to encourage owners/agents, residents, the community, etc. to collaborate with HUD and other government agencies to facilitate the immediate eradication of bed bug infestation. Lastly, although the facts indicate that bed bugs are not linked to poor sanitation/house keeping, the overt stigma still remains. This could be attributed to the inadequate information and/or knowledge that individuals and/or organizations may have pertaining to the bed bug issue. Accordingly, I want to encourage you to offer as much information as you can to educate yourself, your staff, your residents and your communities and to work cooperatively with all interested parties when dealing with bed bug control and/or eradication.

Suggestions Regarding Prevention and Education: Before Bed Bugs are in the Unit

The education of all property stakeholders including on-site staff and residents is as important to eradicating bed bugs as having a top notch qualified pest control professional treat the affected unit(s). Like crime, the problem can and will not be eliminated unless owner/agents work in partnership with the residents. The fostering of a spirit of cooperation with a clear and common sense dialogue is as essential as engaging a qualified pest control professional.

Our office wishes to encourage owners to:

1. Develop and implement a pest management policy that promotes education and awareness, management and control, prevention and early detection for the owner/agent, on-site staff, residents, etc. The policy should be designed to utilize the integrated pest management (IPM) approach, which is briefly discussed later in this memo;
2. Routinely post flyers that provide factual information regarding bed bugs. Owners/agents should be aware that having bed bugs can 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;
3. Ensure residents report a problem when discovered. Encourage and support those who immediately report bed bug infestations. Again, flyers, notices, etc. should emphasize making residents feel comfortable to report infestations to the management agent;
4. Regularly provide information during move-in inspections. Attached to this memorandum are examples of informational flyers that can be given to residents at move-in and recertification, etc. The flyers offer information regarding what a bed bug looks like and suggestions concerning the actions they should or should not take if they discover bed bugs within their unit;

5. Routinely provide information during annual recertification;
6. Inquire about bed bugs during periodic inspections and/or completion of work orders;
7. Offer the appropriate assistance during the unit preparation, which occurs prior to the implementation of the extermination process;
8. 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.;
9. 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; and
10. Consider that bed bug and other pest infestations may be circumvented at properties whose residents are fully informed, fully engaged, are on the look out for pests and will take immediate action when they observe the first sign of pest/bed bugs infestation.

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 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. These steps include but are not limited to:

- a. 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;
- b. Optimally, encase mattresses and box springs in identified units;
- c. Explain to the residents the importance of vacuuming, cleaning and getting rid of clutter to eliminate places for bed bugs to hide;
- d. Notify all residents and applicants that bed bugs have been found in the building;
- e. Contact the HUD project manager for the development, who may be able to provide additional information and help troubleshoot throughout the treatment process; and
- f. Inspect and treat if necessary not only the affected unit, but also all units surrounding that unit (a 360 degree inspection or “cloverleaf inspection”).

Treatment

Our office suggests that owners/agents establish an integrated pest management (IPM) approach toward eradicating bed bugs. IPM includes 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. Web site links pertaining to more information on IPM can be found on the last page of this memo.

Management staff should be able to detect bed bug activity during routine inspections or in response to work orders, etc. Our office encourages owners/agents to ensure that both maintenance and management staffs receive proper training on detecting bed bug infestation,

how to choose a proper servicer that is licensed and has experience in treating for bed bugs. Local agencies that offer training opportunities can also be found on the last page of this memo.

We also recommend the following:

1. Timing of Notice of Treatment. Unit preparation is a significant component regarding the treatment process of a unit. In addition, please consider that depending on the type of treatment that an owner/agent uses, the preparation of the unit can not only be onerous, it can also be very stressful. In view of these particulars, we wish to impress upon you that residents should be given ample notice regarding the scheduling of treatment(s). Having sufficient time to prepare a unit is essential to the success of the treatment.

Please remember that the infestation of pests (bed bug or otherwise) is not normally considered an emergency. Therefore, in accordance with the City of Chicago Residential Landlord and Tenant Ordinance, residents should receive at least a “two day notice” prior to an owner/agent’s entry into a unit. Properties, which are located in other areas of the state, should follow the applicable local ordinance regarding this matter. Please note that a notice as short as 48 hours may not give residents sufficient time to properly prepare their unit for chemically-based treatments.

Owners/agents should attempt to work with residents to establish a date for treatment that will allow adequate time for the preparation of the unit. Owners/agents should also attempt to confirm with the residents that the notice is sufficient and will allow the household to properly prepare their unit for treatment. Our office encourages you to include in the notice that the owner/agent (if practicable) will provide reasonable assistance for senior residents or residents with disabilities, etc. regarding the preparation of a unit. Additionally, residents who may have physical problems with the bed bug treatment or difficulty preparing their units for the treatment may request (orally or in writing) a reasonable accommodation from management. For that reason, owners/agents should be prepared to assist residents who may need help with unit preparation. Likewise, management should be prepared to make alternative arrangements for residents who may have health sensitivities too chemically- based treatment(s);

2. Content of the Notice of Treatment. The notice should include the date and time of the proposed treatment, practical instructions regarding the preparation of the unit and a telephone number to call with questions. We recommend that you also include a disclosure statement concerning the types of chemicals that will be used as a part of the treatment. Additionally, we suggest that a statement informing residents of their right to seek a reasonable accommodation if, due to a disability, residents have difficulty preparing their unit for treatment or are likely to suffer health effects as a result of the particular treatment used;
3. Resources for Residents during Treatment. The most important suggestion that we can offer is to encouraged owner/agents to keep residents informed by offering informational materials, conducting periodic meetings, explaining the treatment process, etc. Also, we encourage owners/agents to provide the tools needed to prepare units for treatment such

as mattress encasements, plastic bags for laundered clothing, sealable/disposable vacuum bags, etc.

4. Furniture. Only in certain circumstances, and on the advice of a qualified pest control professional, should management consider notifying residents that they should dispose of their furnishings. Such notification should be made only as a last resort. We do not recommend that owners/agents consider terminating the tenancy of residents who refuses to dispose of their furnishings;
5. Methods of treatment Our recommendations in this regard are: (1) Engage a qualified pest control professional that has demonstrated experience in eradicating bed bugs. (2) In consultation with a pest control professional, attempt to determine the best method(s) of treatment. As mentioned earlier, our office strongly encourages the utilization of the Integrated Pest Management approach, which includes using the best, most cost effective and least hazardous methods available. (3) Periodically inspect units for signs of bed bug infestation, speak to residents concerning any noticeable clutter, caulk or seal any obvious cracks and crevices, etc. Also, as mentioned earlier, you should always consider implementing a 360 degree or cloverleaf inspection and/or treatment; and
6. Education Continuously providing residents with the necessary information and tools that can assist you in preventing and/or eradicating bed bug infestation is highly recommended. In fact, it could very well be the key component to the success of any approach that owners/agents may implement. Our office suggest that owners/agents inform residents that simple yet cost effective steps such as (1) minimizing clutter; (2) laundering bedding/clothing in hot water of at least 120 degrees; (3) drying with a hot setting for at least fifteen minutes; (4) encasing mattresses/box springs in sealed plastic covers; (5) routinely vacuuming of the entire unit; etc. are all very effective and highly recommended by our office.

Responsibilities:

Obviously, owners/agents have a responsibility to protect their respective assets, to provide safe, decent and sanitary housing, to enforce the provisions of the executed lease and to comply with HUD regulations and/or guidelines, etc. Although it is the right of an owner to develop policies and protocols relating to infestation, our office strongly encourages owners/agents to rely upon the covenants in the lease if enforcement action becomes necessary. 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

Of course residents also have a responsibility to comply with HUD requirements, the covenants of the lease and the appropriate house rules, etc. There is no silver bullet regarding the eradication of bed bugs. For that reason, our office recognizes that the responsibility to eradicate bed bugs lies not only with the owner or the resident but also with HUD and any other interested party.

Possible Resources

Our office appreciates the fact that bed bug treatment(s) can be more costly than the treatments regarding other pests. Moreover, we understand that bed bug infestation can be reoccurring, thus, creating a greater cost burden upon an asset. For that reason, if project funds are not sufficient, our office will consider (**on a case by case basis**) an owner/agent's request to utilize residual receipts and/or reserve for replacement funds as a means to pay for treatment(s) to eradicate bed bug infestation. Additionally, our office may consider granting budget based rental increase request that will exhibit specific increases, which will be exclusively earmarked for bed bug control and/or eradication. However, we may require an owner/agent to execute detailed measures and/or implement specific procedures prior to an approval regarding the utilization of one or more of the aforementioned. For more detailed information regarding this matter, please contact the appropriate staff member with jurisdiction of the property.

Links to Obtain More Information:

Integrated Pest Management websites

EPA: <http://www.epa.gov/pesticides/factsheets/ipm.htm>

University of Illinois at Chicago: http://www.uic.edu/sph/glakes/harts/HARTS_library/Ipm.txt

Safer Pest Control: <http://spcpweb.org/residential/>;

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

How to pick out 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-control-company>;

Available training for staff (\$):

Chicagoland Apartment Association will be doing sessions quarterly - www.caapts.org;

NAA (National Apartment Association) hosts regular online Bed Bug training –

<http://www.naahq.org/education/onlinelearning/Pages/default.aspx> ;

Bed Bug Solutions (DVD) http://bedbugsolutions.com/training_dvd.php;

Other sources of bed bug information available from industry partners:

Illinois Department of Public Health: <http://www.idph.state.il.us/envhealth/pcbedbugs.htm>

Apartment checklist for apartment owners and managers from Safer Pest Control:

<http://www.cityofchicago.org/content/dam/city/depts/bacp/bedbugs/landlordschecklist.pdf>

Metropolitan Tenants Organization (MTO): <http://www.tenants-rights.org/bed-bugs-faq/>

MTO can also provide presentations in the Chicago area for tenants on bed bugs upon request.

Cook County Health Department

http://www.cookcountypublichealth.org/files/pdf/CCDPH%20Bedbugs_Factsheet.pdf

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

Dini Miller, PhD Virginia Tech: <http://web.ento.vt/ento/personalPage.jsp?uuid=1162415>

Guidelines for Prevention and Management of Bed Bugs in Shelters and Group Living Facilities:

<http://www.nysipm.cornell.edu>

I want to express my sincere gratitude to all of you who have contributed so much to the issuance of this memo and to thank you for your participation in this process. Also, I want to say a special thank you to George Gilmore of my staff and to Mary Mauney of the National Housing Compliance. Their invaluable input and leadership has made the whole process of offering this memorandum much more manageable. If you have any questions, please contact George Gilmore at 312-913-8141.

Attachment