



# **BUILDING A FRAMEWORK FOR HEALTHY HOUSING**

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## **IPM Policy for Rental Housing**

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# Overarching Issues/Opportunities

- Property owner ignorance of pesticides' costs and IPM benefits
- Demonstrable progress reducing use:
  - Schools/Workplaces
  - Outdoors
  - Agricultural – protecting food supply
- Publicly owned property = ready model



# Principles of IPM Housing Policy

- Stop unhealthy practice: do no harm
- Protect occupants from exposure to
  - Pests – current laws: “extermination”
  - Pesticides – via product “registration” and licensed/certified personnel
- Sustainable, universal



# Key Policy Levers

- Codes: sanitary, housing, health codes regulate buildings; many prohibit pests
- Regulators: require pesticide applicators use IPM; restrict broadcast applications
- Pesticide registration policies can limit availability of toxics in liquefied form
- State/federal standards; guidance; funds



# Federal-Level Policy/Practice

- HUD:
  - PHA Guidance: “consider” IPM to control pest
  - Housing Quality Standards (HQS)- rules for federally assisted homes – basic provision
- EPA:
  - regulate pesticides via pesticide-labeling
  - authorize states to oversee pesticides and pesticide application
  - promote effective IPM practice
- ~~USDA: cooperative extension work~~



# Federal Insecticide, Fungicide and Rodenticide Act - FIFRA

*“Federal agencies shall use Integrated Pest Management techniques in carrying out pest management activities and shall promote Integrated Pest Management through procurement and regulatory policies, and other activities.” 7 USC 136r-1*



# Federal-Level Recommendations

HUD: comply with FIFRA

- specify IPM in subsidized housing via HQS

- HQS specify IPM to control pest infestations in issue standards/guidance (including privately owned)

EPA and USDA: promote IPM in housing sector

Congress:

- Direct EPA to advance effective IPM in housing

- Restrict indoor use/sale of foggers/ bombs/sprays

- Authorize incentive grants



# Powers of State Pesticide Programs

- Authority to “register” pesticides
  - Limit sales/use
  - Permit localities to limit pesticides’ sales/use
- Control over who uses toxic pesticides
  - Oversight via certification of operators/ applicators
  - Separate certs: residential, child-occupied facility
- Power to require advance notification,  
postings, other communications



# Basic IPM Policies for State Pesticide Programs

- Advance notice/disclosure
  - Occupants of residential buildings
  - Notify neighbors of exterior pesticide use
- Create address registry of pesticide-sensitive persons, require PCO notify of adjacent use
- Maintain approved list of service providers (MA)
- Require IPM training for pesticide applicators
- Use pesticide registration fees for IPM grants



# Comprehensive **State** IPM Policy: Maine Board of Pesticides Control

Pesticide applicators must:

- Provide advance written notice of plan to use in occupied buildings; application prohibited if a tenant objects
- IPM-first: minimize exposure, human risk
- Identify specific pests and conducive conditions, provide evaluation with specific recommendations for practical non-pesticide control measures.



# Basic IPM Policies from Other **State** Agencies

- Mandate IPM in state-owned property including higher education and correctional facilities (MN)
- State housing, sanitary, health codes
  - MA Sanitary Code § 410.550
  - VT rental housing health code § IV
  - Property maintenance code like NJ



# State Housing Finance Agencies: Criteria for Tax Credits, Loans

## Requirements for Development

- Asthma-safe building standards (CT)
- Green building and/or Energy Star standards:

forestall air leaks, moisture problems  
prevent pest intrusion

## Extra Points, Green Communities \$\$

- Green building design



# Recommendations for States:

1. certified pesticide applicators - adopt IPM as standard of care in occupied building.
2. prohibit use, sale of toxics in liquid and granular indoors: bombs, foggers
3. rental property owners - use IPM
4. state-supported housing development - meet green, asthma-safe building criteria
5. publicly owned property – IPM, specs



# Local Codes' Relevance

- Construction Codes - structure
  - Building, residential, existing building
  - Enforced: permit, final inspection
- Housing Codes” - condition, habitable
  - Property maintenance, rental housing codes, sanitary, health codes
  - Enforced: turnover, periodic inspection, complaint



# How Codes Assign Responsibility

- rental property owner - any infestation **ever**
- occupant of single family dwelling or infested dwelling in multifamily prop.
- rental property owner - infestation caused by failed maintenance; in more than one unit; common areas
- both owner and tenant



# Common Code Provisions Require Some IPM

- Pest entry, habitat:
  - Cover exterior openings within 4 feet of ground, reachable by pipes, wires, stairs, roofs, trees, vines
  - Maintain screens in good repair
  - Construct sewers, pipes, drains, conduits to prevent ingress or egress of rats
  - Neatly store materials outside the building away from the exterior walls of the structure



# How to Improve Codes for IPM

- Treat both infestation and toxic pesticide use as serious code violations
- Require IPM of rental property owners:
  - Maintain property in good physical condition
  - Perform visual inspection: vacancy, periodic
  - Notify tenants of IPM plan, pesticide use
  - Request that tenants report infestation
  - Permit targeted use of toxic pesticide (C&C), prohibit indoor use of liquid, granular form



# Locally Owned Buildings

- NYC Pesticide Reduction Law: City agencies (including housing authority), contractors to phase out use of toxic pesticides:
  - toxic or known/suspected to cause cancer/developmental disorders
  - emphasizes safer alternatives throughout city-owned real estate
- Similar policy enacted in San Francisco in 1996
- Other localities in WA, CA, NY developing policies for property management.



# Local Public Housing Authorities

- Boston's public housing authority IPM initiative builds capacity and resident awareness:
  - community health advocates
  - train housing authority managers in IPM
- NYC has trained pest control operators, others
  - HEPA vacuums to remove allergen, pest harborage
  - steam machines to remove cockroach waste, eggs
  - handheld ultraviolet lights for inspections
  - exterior oxygen-voiding trash compactors
- NYC added IPM to kitchen upgrades



# Recommendations for Localities

1. Health and housing codes to require rental property owners prevent and eliminate infestations using approved IPM strategies
2. Publicly owned property (including public housing) - use IPM and model IPM contract spec
3. Housing-related funding (block grants, other resources): prioritize IPM, target



# Recommendations for Health Payers

- To protect individual patients from pesticide and pest exposure:
  - Health care agencies: name infestation and pesticide use as vectors of asthma
  - Public and private payers: factor IPM benefits in reducing asthma/respiratory
  - Education/env. assessment programs: offer basic pest management supplies



# Reasonable Accommodation ?

- Private market: Tenants sensitized to pesticides in properties with 4+ units can seek IPM as reasonable accommodation of a disability under the Fair Housing Act  
(if successful, tenant may have to *pay* cost)
- Public housing tenants can request IPM under ADA, Rehabilitation Acts





# BUILDING A FRAMEWORK FOR HEALTHY HOUSING

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**Thanks!**

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# BUILDING A FRAMEWORK FOR HEALTHY HOUSING

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## Implementing IPM in Low- Income Rental Housing



Steve Pincuspy  
Senior Program Associate  
Safer Pest Control Project

# Safer Pest Control Project

- Non-profit dedicated to reducing health impacts and environmental effects of pesticides in Illinois
- Public housing, schools, daycares and yards/parks
- Promote safer alternatives - i.e. IPM - through training and education
- 1998 IL Governor's Pollution Prevention Award
- Moving forward: IPM education in low-income housing city-wide



# Rental Housing in Chicago

- Significant number of rental units aged or in deteriorating condition
- NY Survey – due to a variety of socio-economic conditions the likelihood of pest infestation (and subsequent pesticide use) are correlated to income and race
- Pest problems are real in Chicago
  - 22% of rental units in the city occupied by households with incomes below the poverty level
  - Sub-standard housing
  - Greater likelihood of pest infestations & pesticides
- Point: Widespread use of pesticides not resolving pest problems
- Point: Renters are generally unaware of alternatives to pesticides



# Health Implications of Pesticide Use

- Landlords and residents disproportionately rely on pesticides as primary pest control method
- Pesticides exacerbate urban health problems
  - Asthma, poisonings, chronic disease
- Pesticides do not address root causes – temporary fix at best



# IPM – Effective Pest Control

- Pest infestations result of structural and behavioral practices
- IPM is more effective at controlling pests and reducing pesticides (Meek & Miller, SPCP, Greene & Briesch)
- IPM saves money (Wang & Bennett, Mount Sinai Environmental Health Center)
- Education/training is necessary to encourage IPM adoption



## 3 Outreach Models for IPM Adoption

- Proxy – work with institutional staff via Housing Choice Voucher program
- Direct – bring outreach directly to community residents
- Train-the-trainer – enlist community organizations to present message



# Proxy – Housing Choice Voucher

- CHA's Plan for Transformation
  - Rehab aging buildings and shift public housing participants to private sector
  - 13,000 units lost in transition
- Dispersed population
  - Increases training challenges
- Train staff administering HCV program



# Proxy

- Pros
  - Institutional: staff can reach larger audience
  - Access to residents via mandatory and voluntary resident/tenant meetings
  - Increase general IPM awareness
- Cons
  - Minimal oversight of staff and subsequent promotion of IPM principles
  - Inability to control attendance
  - Reduced contact/training time



# Direct

- Workshops conducted in community locations
- Held in conjunction with local organizations covering health and tenants' rights
- Use additional incentives to help drive participation



# Direct - Tradeoffs

- Pros
  - Some control - participation/attendance
  - Local organizations add credibility
  - Longer workshops
- Cons
  - Competing priorities
  - Uneven attendance
  - Fatigue



# Train-the-trainer

- Train community groups to present our materials
- Workshop formats include both structured and unstructured
- Trainings can occur in multiple languages
- Still under development



# Train-the-trainer

- Pros
  - Potential to reach city-wide audience
  - Alleviate planning and resource burden
  - Increase cost-effectiveness
- Cons
  - Locating and training presenters
  - Scheduling and incentives
  - Trainer oversight and QA/QC



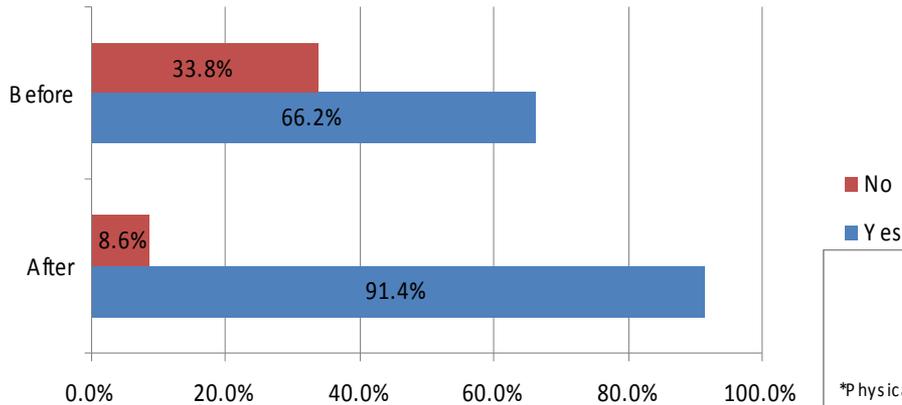
# Outreach Results (Two Years)

- 235 agency staff trained: 1 hour presentations with surveys
- 265 residents: 15 to 20 min. presentations
- 77 residents: 1+ hour presentations with surveys
- 14 landlords: 45 to 60 minute presentations
- 13 landlords: 2 hour presentations with surveys



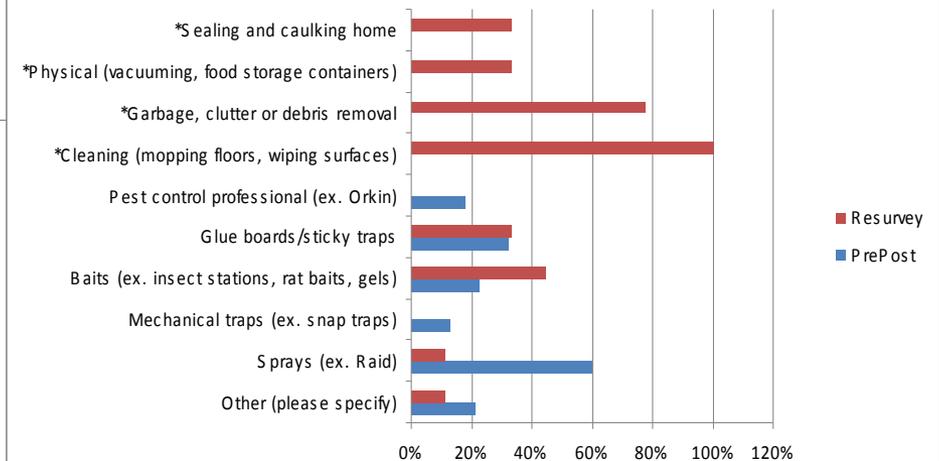
# Survey Results (Past Year)

## Concerned About Pesticides?



## Residents

### Controlling Pest Problems



**Landlords –  
insufficient data**



# Conclusions

- Local agencies will allow greater public contact, but less time for education
- Direct outreach is difficult without local support... and challenging even with it
- Train-the-trainer has tremendous potential, but requires supervision
- Most successful strategy will employ a combination of all three approaches
- Policy level changes need to speed IPM adoption – building codes, tenants' rights, city agencies





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## **Innovative Partnerships for Implementing Residential IPM**

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Mike Boeck  
IPM in Health Care Facilities Project  
Maryland Pesticide Network-Beyond Pesticides

# IPM in Health Care Facilities Project

- Initiated in 2005 by Maryland Pesticide Network and Beyond Pesticides
- Enables IPM implementation/transition through pilot partnerships with a select group of Maryland health care facilities
- Establishing a model for IPM transition at health care facilities
- Establishing a model for cooperative IPM outreach to adjoining communities



# Why Health Care Facilities?

- Developmental, geriatric, and other health concerns of vulnerable populations:
  - newborns, infants, and children
  - the elderly
  - patients/residents with compromised immune, nervous, and respiratory systems
  - patients/residents with allergies or sensitivity to chemicals
  - patients/residents subject to cross-reaction with medications



# Pest Management at Health Care Facilities

- Healthy Hospitals Report (2003) found pervasive “first-line” use of chemical pesticides at hospitals and health care facilities in the US.
- Survey of Maryland health care facilities found that vendors at the majority of facilities give priority to chemical methods for pest control. [Respondents: 32 hospitals and 11 elder care facilities]



# IPM in Health Care Facilities

## Project Partners

- Fourteen IPM pilot partner facilities include:
  - Medical and psychiatric hospitals
  - Geriatric health and elder care residential facilities
- Several hospital partners border on underserved communities in Baltimore City
  
- Collaborators include:
  - Maryland Chapter of Hospitals for a Healthy Environment (“Green” Hospital Networking)
  - IPM Institute of North America (Technical Expertise)
  - Morgan State University School of Community Health and Policy (Outreach and Education)



# IPM Pilot Process for Health Care Facility Partners

- Two-Step Assessment – Survey and Walk-Through Inspection
- Vendor Contract and IPM Plan Review
- Assessment Report and Recommendations
- IPM Policy Development and Adoption
- Staff Training on IPM



# Delivering on Residential IPM

- Elder Care Pilot Facilities
  - Long-term residential and assisted living
- Information for discharged patients -- “IPM As Part of Your Aftercare”
- Staff training on IPM includes “Take Home” message
- Community IPM Outreach in Baltimore City



# Patient Brochure

## Protect Your Health

Make IPM Part of Your Aftercare



(Facility Logo)

### How [facility name] practices safe pest management

[facility name] practices safe pest management by reducing the need for pesticides. We keep pests from entering our facility by keeping our facility clean and in good repair so that ants, rats, mice, roaches and flies cannot enter, find food, or find a place to breed. We always look for signs of pests, and use non-chemical methods to manage them whenever possible. If pests are still a problem after taking these steps, we only use least-toxic pesticides as a last resort.

### Why should safe pest management be part of my post-hospital care plan?

While everyone benefits from safe pest management, babies, children, the elderly and those with existing illnesses or recovering from surgery and other hospital treatments are at greater risk to the health effects of pesticides and diseases carried by pests.

### How can I practice safe pest management at home to protect me and my family?

- ❑ **Don't feed pests...prevent them!**
  - Put away food items and clean up crumbs
  - Wash dishes or put them in dishwasher as soon as possible
- Store all food in well-sealed containers in the refrigerator or cabinets
- Keep pet food in a container overnight or high off the floor
- Fix leaky pipes
- ❑ **Seal them out**
  - Insects and spiders can squeeze through gaps of that are only 1/16 inch. Mice can squeeze through a hole the size of a dime and rats can squeeze through holes the size of a quarter! Keep them out and save on energy costs:
    - Put door strips on all outside doors
    - Seal baseboards with caulk,
    - Caulk cracks around windows and doors
    - Plug holes with caulk or steel wool (use gloves!)
    - Fix gaps and tears in window and door screens
    - Fill gaps around pipes under sinks and stoves

### ❑ Store trash in clean garbage cans with lids.

❑ **Use sticky traps, spring traps or live-capture traps for rats and mice.**  
Buy non-chemical pest control products. They are available at health food stores, some supermarkets and home improvement stores.

### ❑ Natural land care

- Use a simple soil test, sold at home improvement stores or online, to find out what your soil needs for a healthy weed-free yard.
- Aerate your lawn – this will let water, air and nutrients reach the roots of the grass. Home improvement stores sell tools for aerating
- Feed lawns and plants with compost or a natural organic fertilizer.
- Set your lawn mower to 3" as longer grass crowds out weeds.
- Rake out thick layers of grass to prevent pests.

If you use a pest control company, make sure they practice IPM, and only use least-toxic pesticides as a last resort. If you use a lawn care company, you can ask for organic lawn care that does not use pesticides. Ask for the Material Safety Data

Sheet for any pesticide a company uses which tells you about some of the health risks linked to the product.

### Are there other ways to reduce my exposure to pesticides?

#### ❑ Buy safer products

Pesticides are in cleaning and cosmetic products, flea and tick treatments and lice shampoos. Healthier choices are available at health food stores and some supermarkets.

#### ❑ Eat more organic

Eating just a few organic foods a week helps reduce the pesticides in your body. Foods with the highest levels of pesticides are: peaches, strawberries, apples, spinach, nectarines, celery, pears, cherries, potatoes, bell peppers, raspberries and grapes.

#### ❑ Avoid sprayed areas

Stay away from recently sprayed athletic fields, golf courses and other treated grounds. Don't sit, lie or play on areas recently sprayed. In Maryland, companies must put up yellow signs saying the area was recently treated with pesticides.



Store all food in well-sealed containers



Seal baseboards with caulk



Feed plants with compost or a natural fertilizer



Buy organic foods



# Community IPM Project

- Partnership with Morgan State University for outreach and education to underserved communities adjoining health care pilot facilities on the health risks of pesticides and safer IPM alternatives
- Outreach through neighborhood associations, community events, and collaboration with healthy home partners



# Community Outreach in Baltimore

- Providing both direct IPM training and train-the-trainer
- Survey questionnaire on residential pest management included in IPM training, with follow-up survey to measure change
- Exploring expansion through outreach to public and charter schools



# Community IPM Brochure



Pests and Pesticides In Your Community

## Keep Pests and Dangerous Pesticides Out of Your Home!

A Healthy Home Guide from the IPM Community Outreach Project



MPN  
MARYLAND PESTICIDE  
NETWORK



## Keep Pests Away without Dangerous Pesticides



### Did you know?

Mice can squeeze through a hole the size of a dime, and rats can squeeze through a hole the size of a quarter.



### How to keep rodents and bugs out of your home

- Wash dishes or put them in the dishwasher as soon as possible.
- Clean up all food and crumbs right away.
- Put food in the refrigerator or kitchen cabinets in sealed containers.
- Put garbage outside for pickup in heavy duty trash bins with lids tightly covered.
- Store trash cans away from doors.



### Keep bugs out and save money on your energy bill:

- Install or fix door strips and sweeps on all outside doors.
- Seal baseboards with caulk, especially in the kitchen.
- Plug holes with caulk or steel wool.
- Fix gaps and tears in window and door screens.
- Caulk cracks around windows and doors.



### After you have done it all, if bugs or rodents still get into your home:

- Buy pest control products without dangerous chemicals. These products are found in home improvement stores and health food stores.
- Ask your local stores to carry non-toxic pest control products if they don't already do so.
- Buy and use spring traps for rats and mice.

If you see trash on your street, be sure to call the Baltimore City Service Hotline at 311 (443-263-2220 outside the city).



### Pesticides are also in:

- Lice shampoos
- Antibacterial products
- Flea and tick products for pets

Safer, non-toxic products for treating lice, fleas, and ticks on pets are available. Ask your local stores to carry these safer products.

For more information on keeping pests and dangerous pesticides out of your home, contact the IPM Community Outreach Project at 410.605.0095, ext 5.



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FOR HEALTHY HOUSING

# Outreach Results (One Year)

- IPM training delivered to core group of 20 residents representing Oliver, Collington Square, and Boyd-Booth Community Associations
- Initial batch of 23 household surveys completed, with followup surveys this fall
- Other outreach through events sponsored by ACORN and the Coalition to End Childhood Lead Poisoning (Asthma Summits)



# Findings

- Residential IPM presents a much steeper challenge than institutional
- Access to safer alternatives to chemical pesticides severely limited in urban areas
- “Self-selecting” direct outreach participants tend to already understand IPM concepts
- “Pest pressures” in urban settings largely out of residents’ control
- Partnering with health care facilities can provide resources and public health expertise

