



**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

SPECIAL ATTENTION OF:

Regional Directors; State and Area Coordinators; Public Housing Hub Directors; Program Center Coordinators; Troubled Agency Recovery Center Directors; Special Applications Center Director; Administrators, Offices of Native American Programs; Public Housing Agencies; Housing Choice Voucher/Section 8 Public Housing Agencies; Tribally Designated Housing Entities; Indian Tribes; Resident Management Corporations.

NOTICE PIH 2007-12 (HA)

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24 CFR 903.7(e)(2)

**This Notice Supersedes Notice
PIH-2006-11 (HA)**

Subject: Guidance on Integrated Pest Management

1. **PURPOSE:** The purpose of this Notice is to inform public housing agencies (PHAs) and Tribally Designated Housing Entities (TDHEs) to reference materials on Integrated Pest Management (IPM) located in Maintenance Guidebook Seven: Termite, Insect and Rodent Control and reference material located at paragraph 7 of this notice. PHAs and TDHEs (HAs) may choose to share this information with families and property owners participating in their programs.
2. **APPLICABILITY:** The information in this Notice may be of interest to HAs, property owners, property managers, and family program participants when they review their pest control efforts. The decision to reflect IPM processes in their ongoing pest control efforts rests solely on local management. The use of this material is voluntary for the HAs; however, HUD promotes the use of IPM for pest control.
3. **BACKGROUND:** The goal of IPM (per the Environmental Protection Agency) is to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. To undertake IPM, property managers should be committed to ongoing or continuous monitoring and record keeping, education of residents and staff, and good communication between residents and building managers. IPM methods involve restricted access to food/water, sanitation and waste management, mechanical control, natural control agents, physical barriers, structural maintenance, and, where necessary, conservative application of pesticides.

HUD has supported IPM for more than two decades and published and distributed Maintenance Guidebook Seven: Termite, Insect, and Rodent Control, to all PHAs in 1995. Some HAs use the IPM approach to pest management and have seen it dramatically reduce both pest populations and pesticide use. IPM programs have also positively engaged residents through the outreach and education needed to prepare them for their role in implementing IPM.

4. DEFINITION: IPM efforts involve HA staff, contractors, and residents, and include:
- a. Communicating the HA's IPM policies and procedures to all building occupants, administrative staff, maintenance personnel, and contractors.
 - b. Identifying (1) pests and (2) environmental conditions that limit the spread of pests, including the presence of pests' natural enemies.
 - c. Establishing an ongoing monitoring and record keeping system for regular sampling and assessment of pests, surveillance techniques, and remedial actions taken, including establishing the assessment criteria for program effectiveness.
 - d. Determining, with involvement of residents, the pest population levels – by species – that will be tolerated, and setting action thresholds at which pest populations warrant action.
 - e. Improving sanitation, waste management, mechanical pest management methods, and/or natural control agents that have been carefully selected as appropriate in light of allergies or cultural preferences of staff or residents.
 - f. Monitoring and maintaining structures and grounds (e.g., sealing cracks, eliminating moisture intrusion/accumulation) and adding physical barriers to pest entry and movement.
 - g. Developing an outreach/educational program and ensuring that leases reflect residents' responsibilities for: (1) proper housekeeping, (2) reporting presence of pests, leaks, and mold, and (3) cooperating with specific IPM requirements such as obtaining permission of HA management before purchasing or applying any pesticides.
 - h. Enforcing lease provisions regarding resident responsibilities such as housekeeping, sanitation, and trash removal and storage.
 - i. Using pesticides only when necessary, with preference for products that, while producing the desired level of effectiveness, pose the least harm to human health and the environment, and, as appropriate, notifying PHA management before application.
 - j. Providing and posting 'Pesticide Use Notification' signs or other warnings.
5. HEALTH AND COST CONCERNS: Pests may adversely impact health and contribute to worsening some diseases, such as allergies and asthma. Therefore, pest control methods are targeted to protecting the health of residents and staff. Even though applying pesticides may be effective in eliminating pest populations, many of these chemicals may be associated with health and/or environmental risks, and their use should be minimized if alternative methods exist. IPM frequently has proven to be more effective in reducing pest populations than depending solely on broadcasting pesticides. Therefore, IPM offers the potential of ensuring efficacy of pest elimination while protecting the health of residents and staff.

Most of the effective methods of pest elimination, including ongoing repairs, erection of barriers, and monitoring, will extend the useful life of the property and, thereby, generate significant savings that offset costs of the pest control operations. Many of these non-application methods, including structural maintenance, especially inspecting for and repairing leaking pipes and cracks in roofs, walls, and windows are effective in preventing moisture intrusion and accumulation. Additionally, IPM-conscious HAs assess the need to install physical barriers to both pest entry and pest movement within every structure.

6. IMPLEMENTATION: The choice of pest control strategies is the decision of HAs' property owners and managers. HAs may choose to implement IPM. This may be done to the extent, and in the manner, they determine best, at their discretion. If a HA uses an outside contractor for pest control, the HA's pest control/IPM policies and procedures should be incorporated into the specifications or statement of work for the pest management contract. The HA may also consider training for maintenance staff and education for residents as well as for HA administrative staff who oversee housing developments or administer occupancy and rental duties such as unit housekeeping inspections. If the HA uses its own maintenance staff for pest management, proper training in the HA's IPM procedures is essential. The contract administrator for any pest management contract should also be trained. Successful results rely upon proper implementation; training is therefore of the utmost importance. Not only must maintenance staff be trained, but also residents and their elected leaders. Successful IPM requires resident participation through proper housekeeping, reporting of pest infestations, and trash removal. Residents can monitor pest populations and assist in identifying how to eliminate access to food and water for pests. HUD encourages HAs to partner with local pest management organizations.
7. REFERENCE MATERIALS FOR IMPLEMENTING IPM:
- a. PIH Maintenance Guidebook Seven – Termite, Insect & Rodent Control (September, 1995): http://hudclips.org/sub_nonhud/cgi/pdfforms/HUDGB7.pdf
 - b. PIH Notice 95-66: http://www.hudclips.org/sub_nonhud/cgi/pdfforms/HUDGB1N.pdf
 - c. General Services Administration
 - i. GSA Guidelines For Structural Pest Control Operations: http://schoolipm.ifas.ufl.edu/doc/bus_prac.html
 - ii. Integrated Pest Management Program - Contract Guide Specification (1999) <http://schoolipm.ifas.ufl.edu/doc/contract.pdf>
 - d. U.S. Environmental Protection Agency
 - i. General IPM information (for schools, but generally applicable to such other large buildings as multifamily housing): <http://www.epa.gov/pesticides/ipm>
 - ii. EPA staff contacts: <http://www.epa.gov/pesticides/about/contacts.htm#ipm>
 - iii. List of EPA IPM publications and instructions for ordering documents <http://www.epa.gov/oppfead1/Publications/catalog/subpage3.htm>
 - e. U.S. Department of Defense - Armed Forces Pest Management Board Technical Guide No. 29 Integrated Pest Management (IPM) In And Around Buildings <http://www.afpmb.org/pubs/tims/tg29/tg29.htm>
 - f. Massachusetts Department Of Food And Agriculture Pesticide Bureau - Integrated Pest Management Kit For Building Managers: <http://www.pestinfo.ca/documents/IPMkitforbuildingmanagers.pdf>
 - g. Alliance for Healthy Homes http://www.afhh.org/dah/dah_pesticides.htm
 - h. Canada
 - i. University of Toronto, Integrated Pest Management in Housing, <http://www.utoronto.ca/forest/termite/IPMH.html>
 - ii. IPM Institute of North America - IPM Standards for Schools:
 - i. <http://www.ipminstitute.org/school.htm>
 - ii. http://www.ipminstitute.org/IPM_Star/ipmstar_profiles_monroe_county_in.htm
 - j. PHA RESOURCE
 - ii. HUD-funded "Healthy Public Housing Project" conducted by Harvard School of Public Health in Boston public housing <http://www.hsph.harvard.edu/hphi>

k. PHA Case Studies

iii. CUYAHOGA HOUSING AUTHORITY:

http://www.ehw.org/Asthma/ASTH_EPA_IPM_CaseStudy.pdf

iv. Boston Housing Authority:

<http://www.astharegionalcouncil.org/about/documents/IPMinMultifamilyHousing7.25.06.doc>

The above list of IPM practices does not constitute a HUD endorsement of any specific practice, but provides IPM ideas and practices that have reportedly been used to improve pest management while reducing unnecessary dependence on pesticides. HUD encourages PHAs/TDHEs to share their policies, procedures, resident leases, and written case studies so that these may be published on the HUD web for others to read.

For further information about this Notice, contact the nearest HUD Office of Public Housing within your state. Tribes and TDHE's should contact the nearest HUD Office of Native American Programs. Locations of these offices are available on HUD's website at <http://www.hud.gov>

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Orlando J. Cabrera, Assistant Secretary for
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