



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

SPECIAL ATTENTION OF:

NOTICE: PIH-2012-17

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;

Issued: February 28, 2012

Expired: This Notice remains in effect until amended, superseded, or rescinded

Housing; Housing Choice Voucher/Section 8; Tribally Designated Housing Entities; Indian Tribes; Resident Management Corporations

Cross References:

SUBJECT: Guidelines on Bedbug Control and Prevention in Public Housing

I. Purpose

Bedbug infestations have become a serious problem in housing throughout the country. Public Housing properties are not immune to infestations. This Notice provides information and references to best practices regarding the prevention and control of bedbug infestations. It also provides guidance on the rights and responsibilities of HUD, Public Housing Agencies (PHAs) and tenants with regard to bedbug infestations.

II. Background

After a long absence, bedbug infestations are a growing problem in the United States today. According to the United States Environmental Protection Agency (EPA), bedbug populations have increased dramatically. Bedbugs are considered a pest of significant public health importance by the EPA and the 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 bedbugs may also contribute to 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 bedbugs, changes in pesticide availability and technology, and increased resistance of bedbugs to available pesticides. Bedbugs are not an indicator of poor sanitation, but excess clutter can provide them more places to hide, making early detection and targeted control

difficult.

HUD has received numerous reports of bedbug infestations in Public Housing properties in various regions. HUD is working closely with other federal agencies to develop and share best practices for preventing and controlling bedbugs.

III. Applicability

This notice applies to PHAs administering the public housing and project based Section 8 program. It may also be of interest to Indian tribes/TDHEs as well as owners/agents providing assisted housing through the Housing Choice Voucher (HCV) Program.

IV. Prevention of Bedbug Infestations

The best approach to bedbug management is to prevent an infestation from occurring in the first place. Federal agencies, such as EPA and HUD, are working in tandem to develop and share recommendations to prevent bedbug infestations.

PHAs are strongly encouraged to develop an Integrated Pest Management (IPM) Plan. Such plans describe the ongoing efforts the property management will take to prevent and respond to pests. For more details on IPM, please see the online guide at <http://www.stoppests.org>. According to the EPA, principles of IPM for bedbugs include:

- Raising awareness through education on prevention of bedbugs;
- Inspecting infested areas, plus surrounding living spaces;
- Checking for bedbugs in luggage and clothes when returning home from a trip;
- Looking for bedbugs or signs of infestation on secondhand items before bringing the items home;
- Correctly identifying the pest;
- Keeping records – including dates and locations where pests are found;
- Cleaning all items within a bedbug infested living area;
- Reducing clutter where bedbugs can hide;
- Eliminating bedbug habitats;
- Physically removing bedbugs through cleaning;
- Using pesticides carefully according to the label directions; and,
- Following up on inspections and possible treatments.

In addition or as part of an IPM plan, PHAs are strongly encouraged to take the following preventive steps:

- Provide training for staff to identify bedbugs, and to perform ongoing prevention actions as outlined in the IPM. When a community is at high risk for bedbugs (for example, if the community has experienced prior infestations), periodic building inspections are recommended.

- Actively engage residents in efforts to prevent bedbugs. Education and involvement of tenants is a critical component of IPM for bedbugs. Bedbugs may often go undetected and unreported and because they are active at night tenants may not be aware of their presence. PHAs may wish to hold workshops for tenants to learn to identify bedbugs, to create unfriendly environments for pests, and to report suspicions of bedbugs as soon as possible.
- Provide orientation for new tenants and staff, and post signs and handouts regarding bedbug prevention.

More information on bedbug prevention may be found by accessing the following websites:¹

- **Healthy Homes Training:** *What's Working for Bedbug 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 Bedbug 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.bedbugbmps.org>
- **Environmental Protection Agency:**
<http://www.epa.gov/pesticides/bedbugs/>
- **Public Housing Environmental Conservation Clearinghouse (PHECC)**
<http://www.hud.gov/offices/pih/programs/ph/phecc/pestmang.cfm>

V. Addressing Infestations

The PHA should respond with urgency to any tenant report of bedbugs. Within 24 hours of the tenant report, the PHA should make contact with the tenant, provide the tenant with information about control and prevention of bedbugs and discuss measures the tenant may be able to take in the unit before the inspection is performed. However, a bedbug inspection and, if necessary, treatment, may take time to schedule. The PHA should endeavor to take appropriate action within a reasonable time period using the guidelines provided below.

¹ An additional resource for interested parties is the *Bedbug Handbook*. L.J. Pinto, R. Cooper, and S.K. Kraft, *Bedbug Handbook: The Complete Guide to Bedbugs and Their Control* (Mechanicsville, MD: S.K. Pinto & Associates, 2007).

Following a report of bedbugs, the PHA or a qualified third party trained in bedbug detection should inspect the dwelling unit to determine if bedbugs are present. It is critical that inspections be conducted by trained staff or third party professionals. Low level inspections may escape visual detection. For this reason, multiple detection tools are recommended. Recent research indicates that “active” bedbug monitors containing attractants can be effective tools for detecting early infestations. Some licensed pest control applicators use canine detection to verify the presence of bedbugs. The inspection should cover the unit reporting the infestation and no less than surrounding apartments consisting of the units above, below, left and right, and should be completed within three business days of a tenant complaint if possible. If reputable, licensed pest control companies are unattainable within three calendar days, the PHA is required to retain documentation of the efforts to obtain qualified services. If an infestation is suspected but cannot be verified using the methods described above, the PHA should re-inspect the unit(s) periodically over the next several months.

When an infestation is identified, the unit and surrounding units should be treated for bedbugs according to the IPM Plan. Chemical treatments are necessary, but not reliable. Therefore, encasement, interception devices, vacuuming, steaming, freezing and commodity or building heat treatments may be utilized as part of the bedbug 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 residents.

VI. Additional Considerations

PHAs may offer protective tools to residents to help safeguard properties from infestation and recurrences. For example, the PHA may offer residents bed covers, climb-up interceptors, or other detection or protection devices that may become available. PHAs may voluntarily offer to inspect tenants’ furniture before move-in. PHAs may also offer tenants a service of non-chemical treatment of household items upon tenant move-in, non-chemical treatment or inspection of used furniture and/or non-chemical treatment of luggage before it is unpacked when a tenant returns from a trip. Tenants may voluntarily use such services, but PHAs may not require tenants to do so. These services or products are to be offered at the PHAs expense.

A PHA may not deny tenancy to a potential resident on the basis of the tenant having experienced a prior bedbug infestation, nor may give residential preference to any tenant based on a response to a question regarding prior exposure to bedbugs. A PHA may not charge a tenant to cover the cost of bedbug treatment; such costs should be covered by the PHA. HUD reserves the right to approve Lease Addenda. Lease Addenda may not conflict with this Notice.

VII. Tenant Rights and Responsibilities

Tenants are strongly encouraged to immediately report the suspicion of possible bedbugs 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 bedbug infestations and should be encouraged to create living environments that deter bedbugs. This includes reducing unreasonable amounts of clutter that create hiding places for bedbugs, and regular checking of beds and laundering of linens.

Bedbug infestations can cause health concerns, including physical discomfort and may contribute to stress and anxiety on the part of the residents. Tenants should be advised of the following:

- A PHA may not deny tenancy to a potential resident on the basis of the tenant having experienced a prior bedbug infestation, nor may an owner give residential preference to any tenant based on a response to a question regarding prior exposure to bedbugs.
- A tenant reporting bedbugs may expect expeditious response and attention by the PHA, but should be advised that inspection and, if necessary, treatment of bedbugs may take time to schedule. The inspections should occur within three calendar days of the tenant report when possible.
- Following a report of bedbugs, the PHA or a qualified third party trained in bedbug detection should inspect the dwelling unit to determine if bedbugs are present. It is critical that inspections be conducted by trained staff or third party professionals. The PHA may enter the unit to perform these activities, in accordance with the lease.
- If bedbug infestation is found in the unit, the tenant may expect treatment to begin within five 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 heat treatment of clothing and furniture 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 bedbugs and to prevent spreading of infestations.
- Management may make staff available to help with moving and cleaning of furniture to accomplish the treatment effort.
- The tenant will not be expected to contribute to the cost of the treatment effort.

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

VIII. REAC Inspections

Bedbugs should be addressed when reported by staff, tenants or the Real Estate Assessment Center (REAC), regardless of the score of the REAC physical inspection. Inspectors ask the PHA to identify any units and/or buildings that are infested before the inspection begins. When bedbugs are reported or observed, the inspector will record the units and/or buildings affected in the comment section of the Physical Inspection report, noting that bedbugs were reported. The inspector will then select an alternate unit to inspect to replace any unit with observed or reported bedbugs.

REAC sends a “Bedbugs Reported” email to the local PIH field office with a copy to the PIH Regional director when bedbugs are noted in the comments section of a Physical Inspection Report. The PHA will see the information about bedbugs in the comment section of the Physical Inspection Report which provides PHAs with the necessary information to address the situation.

/s/

Sandra B. Henriquez, Assistant Secretary for
Public and Indian Housing

Attachment