



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

As Special Attention of

All Multifamily Hub Directors
All Multifamily Program Center Directors
All Multifamily Operations Officers
All Directors of Project Management
All Field Counsel

Notice H 2011-20

Issued: August 16, 2011

Expires: August 31, 2012

Cross References:

SUBJECT: Guidelines on Bed Bug Control and Prevention in HUD Insured and Assisted
Multifamily Housing

I. Purpose

Bed bug infestations have become a serious problem in housing throughout the country. HUD Insured and Assisted Multifamily properties are not immune to infestations. This Notice provides information and references to best practices regarding the prevention and control of bed bug infestations. It also provides guidance on the rights and responsibilities of HUD, Owners and Management Agents (O/As) and tenants with regard to bed bug infestations.

II. Background

After a long absence, bed bug infestations are a growing problem in the United States today. According to the United States Environmental Protection Agency (EPA), bed bug populations have increased dramatically. Bed bugs 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 bed bugs can also cause 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 bed bugs, changes in pesticide availability and technology, and increased resistance of bed bugs to available pesticides. Bed bugs 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 bed bug infestations in Multifamily properties in various regions. HUD is working closely with other federal agencies to develop and share best practices for preventing and controlling bed bugs.

III. Applicability

This Notice is applicable to all Multifamily properties with active HUD Insured, HUD-Held or Direct Loans, Section 202 or 811 Capital Advances, Project-Based Rental Assistance contracts, and/or HUD Use Agreements.

IV. Prevention of Bed Bug Infestations

The best approach to bed bug 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 bed bug infestations.

O/As 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 detail on IPM, please see the online guide at <http://www.stoppests.org>. According to the EPA, principles of IPM for bed bugs include:

- Raising awareness through education on prevention of bed bugs;
- Inspecting infested areas, plus surrounding living spaces;
- Checking for bed bugs on luggage and clothes when returning home from a trip;
- Looking for bed bugs or signs of infestation on secondhand items before bringing the items home;
- Correctly identifying the pest;
- Keeping records – including dates when and locations where pests are found;
- Cleaning all items within a bed bug infested living area;
- Reducing clutter where bed bugs can hide;
- Eliminating bed bug habitats;
- Physically removing bed bugs 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, Multifamily O/As are strongly encouraged to take the following preventive steps:

- Provide training for staff to identify bed bugs, and to perform ongoing prevention actions as outlined in the IPM. When a community is at high risk for bed bugs (for example, if the community has experienced prior infestations), periodic building inspections are recommended.
 - Actively engage residents in efforts to prevent bed bugs. Education and involvement of project residents is a critical component of IPM for bed bugs. Bed bugs may often go undetected and unreported, because they are active at night, and tenants may not be aware of their presence. O/As may wish to hold workshops for tenants to learn to identify bed bugs, to create unfriendly environments for pests, and to report suspicions of bed bugs as soon as possible.
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- Provide orientation for new tenants and staff, and post signs and handouts.

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

- **Healthy Homes Training:** *What's Working for Bed Bug 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 Bed Bug 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/>

V. Addressing Infestations

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

Following a report of bed bugs, the O/A or a qualified third party trained in bed bug detection should inspect the dwelling unit to determine if bed bugs 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” bed bug monitors containing attractants can be effective tools for detecting early infestations. Some licensed pest control applicators use canine detection to verify the presence of bed bugs. 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 3 calendar days of a tenant complaint if possible. If reputable, licensed pest control companies are unattainable within three calendar days, the O/A is required to

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

retain documentation of the efforts to obtain qualified services. If an infestation is suspected but cannot be verified using the methods described above, the O/A 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 bed bugs according to the IPM Plan. Chemical treatments may be necessary, but are not reliable. Therefore, encasement, interception devices, vacuuming, steaming, freezing and commodity or building heat treatments may be utilized as part of the bed bug 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.

An O/A may contact HUD to request financial resources for bed bug control. The Hub/PC Director may honor requests for releases from the Reserve for Replacement or Residual Receipts accounts to reimburse an Owner for bed bug treatment. The releases should follow the processes outlined in HUD Handbook 4350.1, *Multifamily Project Servicing*, Chapters 4 and 25. Owners should be encouraged to make advances (loan without interest) when no reserves are available. HUD may also consider an increased pest control line item in the project's operating budget, if the Section 8 Housing Assistance Payments (HAP) contract allows for budget-based rent setting in accordance with the *Section 8 Renewal Policy Guide*. However, any request for a rent increase should be part of an ongoing pest prevention program.

VI. Recurring Infestations

Many properties are facing recurring infestations. O/As may offer protective tools to residents to help safeguard properties from recurrences. For example, the O/A may offer residents bed covers, climb-up interceptors, or other detection or protection devices that may become available. O/As may voluntarily offer to inspect tenants' furniture before move-in. O/As may require the non-chemical treatment of furniture upon tenant move-in, and may offer, but may not require, 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. These services or products are to be offered at the Owner's expense.

An O/A may not deny tenancy to a potential resident on the basis of the tenant having experienced a prior bed bug infestation, nor may an owner give residential preference to any tenant based on a response to a question regarding prior exposure to bed bugs. An Owner may not charge a tenant to cover the cost of bed bug treatment. Such costs should be covered by the Owner or from project funds authorized by HUD as described above. 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 bed bugs 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 bed bug infestations and should be encouraged to create living environments that deter bed bugs. This includes reducing unreasonable amounts of clutter that creates hiding places for bed bugs, and regular checking of beds and laundering of linens.

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

- An O/A may not deny tenancy to a potential resident on the basis of the tenant having experienced a prior bed bug infestation, nor may an owner give residential preference to any tenant based on a response to a question regarding prior exposure to bed bugs.
 - A tenant reporting bed bugs may expect expeditious response and attention by the O/A, but should be advised that inspection and, if necessary, treatment of bed bugs may take time to schedule. The inspections should occur within three calendar days of the tenant report when possible.
 - Following a tenant report of bed bugs, the O/A staff trained in bed bug identification (or a third party pest control representative) may inspect any unit in the property to independently verify the presence of bed bugs and to treat an infestation. The O/A may enter the unit to perform these activities, in accordance with the lease.
 - If bed bug 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 bed bugs 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.
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- Generally, relocation from the unit is not necessary; bed bugs may cause discomfort but are not believed to carry disease. However, if reasonable temporary relocation is necessary, the O/A may request withdrawals from Reserve for Replacement or Residual Receipts accounts as described above for those days when treatment is actively occurring that may render the unit uninhabitable. All withdrawals of this type must be approved by the Hub/PC Director or designee. Any temporary relocation must be carried out in accordance with applicable civil rights laws, including, but not limited to, Title VI of the Civil Right Act of 1964 and Section 504 of the Rehabilitation Act of 1973. For example, when persons with disabilities are temporarily relocated, they must be placed in housing that provides, at a minimum, the same accessibility features as the housing in which they currently reside. Additionally, the O/A must ensure the right of return for tenants who have had to be temporarily relocated while the bed bug treatment is being performed.
- 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. However, the tenant may be reimbursed the cost of protective bed covers, at the Owner's discretion.

VIII. Responding to Inspection Findings

Bed bugs should be addressed when reported by staff, tenants or the Real Estate Assessment Center (REAC), or if an audit by the HUD Office of the Inspector General identifies possible infestation.

Presently, REAC inspectors will only deduct points if bed bugs are observed in an apartment or building. However, inspectors now ask the O/A to identify any units and/or buildings that are infested before the inspection begins. If bed bugs are reported, the inspector will record the units and/or buildings affected in the comment section of the Physical Inspection report.

The REAC sends a "Bed Bugs Reported" email to the Hub/Program Center Director when bed bugs are noted in the comments section of a Physical Inspection Report. The Owner will see the information on the inspection report in the comment area.

HUD staff must take the following steps upon receipt of the "Bed Bugs Reported" email from REAC, regardless of the score, or if bed bugs are cited as a deficiency within the REAC report or if bed bugs are reported by the O/A, project residents, the Performance Based Contract Administrator, or an OIG audit:

- Enter the bed bug information on the Problem Statement screen in the Integrated Real Estate Management System (iREMS).
 - If bed bugs were identified by REAC, send the attached letter to the Owner regardless of the score of the REAC Physical Inspection.
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- Advise the Owner to describe what actions were taken or will be taken to eradicate the infestation.
- Advise the Owner to inform HUD when the problem has been completely eradicated.
- Consider releasing funds from Reserve for Replacement or Residual Receipts accounts if requested.
- Continue to enter all related information into the Problem Statement screen in iREMS; and,
- Report any significant developments or problems regarding a bed bug infestation to Headquarters, Office of Asset Management.

Note: Bed bugs are a national problem, so the above action should be taken when REAC notes the presence of bed bugs in the comments section of an inspection, and/or if bed bugs are cited as a deficiency within the body of the inspection report.

If you have questions, please contact your Desk Officer in the Office of Asset Management.

/s/

Carol J. Galante
Acting Assistant Secretary for Housing –
Federal Housing Commissioner

[Attachment](#)

Property Owner
Address

SUBJECT: Bed Bugs
Property Name: _____

Dear Owner:

The [Hub Name] Multifamily Hub has received notification from the Real Estate Assessment Center (REAC) that during the physical inspection of your property performed on [Date], the inspector indicated that bedbugs were reported present at the property. The units/buildings below were identified as being infested with bedbugs:

Within 5 days of the date of this letter, please inform your Project Manager of the actions you have taken or will be taking to eradicate these bugs. This information should include the method of treatment used (or to be used), an anticipated date that the treatment will be completed, and your proposed plan for monitoring and preventing the possibility of future infestation. Finally, please inform your Project Manager when you have completely eradicated the infestation.

If you have any questions, please contact your Project Manager, [Project Manager's Name], at [Project Manager's Telephone Number] ext. [Extension]

Sincerely,

Supervisory Project Manager
Project Management Division