

Integrated Pest Management (IPM) Policy

Knox County Housing Authority
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Article I. Purpose / Scope of the Policy

Section 1.01 The Knox County Housing Authority is committed to managing pests using Integrated Pest Management (IPM). IPM includes early detection of new infestations through regular inspection and monitoring, preventing pests by exclusion, design and good sanitation and taking appropriate control actions when necessary. IPM principles are implemented by the most economical means and with the least possible hazard to people, property and the environment.

Section 1.02 Structural and landscape pests pose significant problems to people, property, and the environment; however, pesticides applied to solve these problems pose risks as well. It is therefore our policy to use an integrated pest management (IPM) program to control structural and landscape pests in and around all buildings in our portfolio.

Section 1.03 Understanding pest survival needs is essential to implementing IPM effectively. Pests seek habitats that provide basic needs such as food, water, and shelter. Pest populations can be prevented or controlled by creating conditions that are not conducive to their survival. This can be accomplished through the removal of pests' basic needs or by simply blocking their access into buildings. Chemical controls are used as a last resort.

Section 1.04 The IPM Plan will contain both general procedures and specific action plans for each pest selected above. Each action plan will include inspection and monitoring guidelines, an action threshold, acceptable management strategies, and criteria for selecting management strategies. The IPM Plan and pest-specific action plans are to be updated at least annually by site staff and more frequently if necessary.

Section 1.05 Through our IPM program, pests will be managed to:

- (a) reduce any potential human health hazard or to protect against a significant threat to public safety;
- (b) prevent loss or damage to housing resources, structures or property;
- (c) prevent pests from spreading in the community or beyond the property; and
- (d) provide a safe and decent place to live and work for residents, staff, and others.

Section 1.06 All our staff (including procurement) and residents, along with any contractors hired to perform pest management or structural repairs, will be subject to this policy. Property Managers or their designee will act as IPM Coordinator to manage the site activities concerning the IPM program. IPM Coordinators will be responsible for the activities including, but not limited to:

- (a) maintaining records and analyzing to improve the program;
- (b) ensuring pesticides are applied by a licensed professional with approved products;
- (c) educating staff and residents about pests and pest management, and;
- (d) facilitating cooperation among all individuals who have a role in pest management.

Section 1.07 Definitions

- (a) **Action threshold:** The maximum pest population that can be tolerated at a particular time and place without posing a hazard to people, property, and the environment.
- (b) **Application:** The actual act of using a pesticide or other technique for the purpose of pest control.
- (c) **Conducive conditions:** An attribute of a given location that can lead to pest presence; structural conditions that contribute to an infestation.
- (d) **Exclusion:** Sealing cracks or openings, or repairing damage to windows, screen doors, utility conduits, and other sites where pests can enter structures or move within structures.
- (e) **Harborage:** The nesting and hiding areas of insects, rodents, and other pests. Debris and clutter often provide harborage sites.
- (f) **Inspection:** A systematic searching for pests, damage, stains, hair, cast skins, or other evidence to identify a pest problem and its extent.
- (g) **IPM:** Integrated pest management. The coordinated use of pest and environmental information with available pest control methods to prevent unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment (U.S. EPA).
- (h) **Mechanical controls:** Traps, including mechanical, sticky, and light, and other tools besides pesticides that can be used to control pests.
- (i) **Pest:** A living organism (animal, plant, or microorganism) that interferes with human purposes for the property.
- (j) **Pesticide:** Any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest (U.S. EPA).
- (k) **Pest Management Professional (PMP):** A company licensed to provide commercial pest management services.
- (l) **Sanitation:** Cleaning up food, water, and clutter that attract pests and allow them to survive. Another description of sanitation is “good housekeeping.”
- (m) **Treatment:** Employment of procedures, application of materials, or the use of resources designed to alleviate pest problems.

Section 1.08 Strategies for maintaining pest populations. Pests include arthropods, wood-infesting organisms, nuisance birds, and any other undesirable organisms in, on, or under structures, excluding bacteria and other microorganisms on or in humans or other living animals. Strategies for managing pest populations will be influenced by the pest species and the degree to which that population poses a threat to people, property, or the environment. Pests found in this jurisdiction include:

- (a) Ants
- (b) Bed Bugs
- (c) Bees/Wasps/Hornets

- (d) Beetles
- (e) Birds
- (f) Fleas
- (g) Cockroaches
- (h) Earwigs
- (i) Flies
- (j) House Centipedes
- (k) Mice
- (l) Millipedes
- (m) Mosquitoes
- (n) Moths
- (o) Pillbugs and Sowbugs
- (p) Rats
- (q) Silverfish and Firebrats
- (r) Spiders
- (s) Termites
- (t) Ticks
- (u) Wildlife: Feral Cats, Bats

Section 1.09 This Integrated Pest Management policy meets the definitions of the Illinois Structural Pest Control Act (225 ILCS 235/3.24)

Section 1.10 This Integrated Pest Management (IPM) policy is applicable and in effect for all programs and properties owned and operated by the Knox County Housing Authority.

Article II. Pest Management Professionals (PMPs)

Section 2.01 PMPs must be educated and trained in the principles and practices of IPM.

Section 2.02 Evidence of training include years of experience along with continuing education at conferences, seminars, or e-learning classes.

Section 2.03 PMPs must follow regulations and label precautions including those pertaining to notification and recordkeeping.

Section 2.04 Applicators must be certified by the state, comply with this IPM Policy, and fulfill the site IPM Plan.

Section 2.05 Certification and regulations also apply to maintenance or renovation contractors who may encounter pests during their work.

Section 2.06 Under no circumstances should PMPs sell, share, or make available any pesticide products to any non-licensed residents or staff.

Article III. Integrated Pest Management (IPM) Procedures

Section 3.01 IPM procedures, as detailed in the IPM Plan, will determine when to control pests and what control methods to employ. Applying IPM principles prevents unacceptable levels of pest activity and damage. These principles are implemented by the most economical means and with the least possible hazard to people, property, and the environment. Our sites shall follow the IPM approach outlined below and detailed in the IPM Plan.

- (a) Monitor each pest to determine pest population, size, occurrence, and natural enemy population (if present), using visual inspection and monitoring devices. Monitor in every unit and common area at least once per year. Based on inspection and monitoring, identify decisions and practices that could affect pest populations. Keep records of all inspections and monitoring.
- (b) For each pest species at each site, set an action threshold—the pest population level at which control actions must be employed.
- (c) Consider a range of potential treatments for each pest problem. Employ non-pesticidal tactics first. Consider the use of chemicals only as a last resort and select and use chemicals approved by the IPM coordinator and in accordance with the provisions of this policy.
- (d) Determine the most effective treatment time, based on pest biology and other variables, such as weather, resident schedule, seasonal changes in wildlife patterns, and local conditions.
- (e) Design and construct indoor and outdoor areas to reduce and eliminate pest habitats.
- (f) Modify management practices, including watering, mulching, waste management, and food storage.
- (g) Modify pest ecosystems to reduce food and living space.
- (h) Use physical controls such as hand-weeding, traps, and barriers.
- (i) Use biological controls (introducing or enhancing pests' natural enemies).
- (j) Use of chemical treatment options.
 - (i) Although the goal of this IPM program is to reduce and ultimately eliminate use of toxic chemicals, toxic chemicals may become necessary in certain situations.
 - (ii) Cost or staffing considerations alone will not be adequate justification for use of chemical control agents.
 - (iii) When it is determined that a pesticide must be used to prevent pest levels from exceeding action thresholds, the KCHA shall employ the least-hazardous material(s). Least toxic pesticides are those labeled with the signal word "CAUTION."
 - (iv) The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), Environmental Protection Agency regulations in 40 CFR, Occupational Safety and Health Administration regulations, and state and local regulations.
 - (v) If it becomes necessary to use pesticides, they will be applied during appropriate times and in such a way to maximize their efficacy and minimize the possibility of human exposure.

- (k) Conduct ongoing educational programs:
 - (i) Acquaint administrative personnel, staff, pest managers, and residents with pest biologies, the IPM approach, and procedures used to achieve the IPM program goals.
 - (ii) Inform the public of our attempt to reduce pesticide use and respond to questions from the public about our pest management practices.
- (l) Monitor treatment to evaluate effectiveness. Keep monitoring records and include them in the IPM log book for at each site.

Section 3.02 Annually, according to a pre-arranged schedule, or as required, pest management professionals and a representative of the KCHA will enter each residence to complete tasks related to the control of vermin. Common pests (i.e. spiders, ants, bees, mosquitos) not related to a large scale infestation shall be handed as part of a residents upkeep of the unit. 24 CFR 903.7(e)(2); Notice PIH 2012-17.

Article IV. Bed Bug Infestations

Section 4.01 In order to successfully eradicate a bed bug infestation, it is essential that all people involved work together. The Knox County Housing Authority assumes the following about bed bug control:

- (a) Although bed bugs are not known to transmit blood borne diseases, they cause a lot of stress to people and can be the cause of skin infections and allergic reactions. The Centers for Disease Control and Prevention (CDC) and the Environmental Protection Agency (EPA) classify bed bugs as a pest of public health significance.
- (b) Regardless of how the infestation started, it was certainly unintentional and if there is no cooperation everyone loses. There should be no shame associated with having bed bugs in an apartment. Although clutter makes it more difficult to eradicate bed bugs, cleanliness cannot prevent the problem from occurring. Denial, shame and blame only make the situation worse. Once an infestation has been identified, the most important thing is to take steps to eliminate it and prevent spread.
- (c) Early detection and intervention is the goal of the IPM program.
 - (i) To reach this goal, the Knox County Housing Authority will conduct a building-wide inspection and monitoring for all pests of all rooms periodically in buildings with known infestations and once quarterly in buildings without infestation.
 - (ii) This inspection and monitoring will consist of questioning residents and staff, visual inspection, monitor placement and other methods as determined to be necessary.
- (d) Once a bed bug infestation has been identified, it takes considerable work to get rid of it.
 - (i) Effective treatment requires the cooperation of at least three parties working together: resident, KCHA staff and the pest management professional (PMP). Without the participation of all three, it will be nearly impossible to eliminate an infestation.
 - (ii) If a resident cannot prepare for treatment, the KCHA may need to reach out to family or local support groups.
- (e) Many people are uninformed about bed bugs and they don't understand what must be done to eradicate this pest. If you feel that a resident, contractor or property manager is not handling the situation properly, suggest that they read through this document and view the suggested resources.

Section 4.02 Bed Bug Prevention Strategies

- (a) The KCHA will make the following available to residents:
 - (i) Monitors such as glue boards or other monitoring devices that becomes available;
 - (ii) Rip resistant mattress and box spring encasements, as needed;
 - (iii) Plastic bags for furniture removal.
- (b) Internal Outreach Efforts. Knox County Housing Authority educates our KCHA community about bed bugs. To ensure material is science-based and correct, KCHA consults with PMP. Information includes pictures of bed bugs, where they like to hide, how to avoid bringing bed bugs home and what residents should do if they find a bed bug in their unit. The following are used to deliver the information:
 - (i) Flyers delivered to residents;
 - (ii) Provide informational pamphlets, posters, and other collateral to residents and in common areas;
 - (iii) Training sessions conducted by KCHA or PMP for staff and residents;
 - (iv) Local mass media.
- (c) External Outreach Efforts. An infestation of bed bugs can begin from any number of sources. In multifamily housing, common sources may include used furniture and items from unknown sources, friends and family who are visiting or hosting residents, visiting professionals such as cleaning contractors and home health aides.
 - (i) Flyers delivered to residents;
 - (ii) Provide informational pamphlets, posters, and other collateral to residents and in common areas;
 - (iii) Training sessions conducted by KCHA or PMP for staff and residents;
 - (iv) Local mass media.
- (d) To get at these various sources of bed bugs Knox County Housing Authority educates people in our community associated with these sources on how to avoid spreading bed bugs. The following are used to deliver the information:
 - (i) Flyers delivered to agencies, residents, and visitors;
 - (ii) Provide informational pamphlets to residents and in common areas. Training sessions conducted by PMP for staff and residents to which professionals outside the KCHA are invited;
 - (iii) Local mass media.
- (e) Unit turnover and move- in procedures.
 - (i) Staff and contractors working in vacant units inspect for bed bugs on items left by the former resident, around the unit and behind fixtures such as baseboards.

- (ii) Admission staff asks new residents about any previous exposure to bed bugs and provides information on how to limit the chance of bringing bed bugs to the property.
 - (iii) Housing is not to be denied because of previous bed bug exposure, but the KCHA works with the resident and a PMP to ensure belongings are moved into the new home without bed bugs.
 - (iv) Bed bug monitors are offered to the resident at move in.
 - (v) KCHA maintenance staff will take all measures deemed necessary to prevent future infestation of adjacent units. These measures include sealing potential paths of migration between units and other spaces.
 - (vi) Home visit: The KCHA reserves the right to conduct a home visit / inspection of a current applicant to determine if there are any infestation problems. KCHA may require as condition of occupancy certification be provided from PMP that the infestation has been eradicated prior to lease-up.
- (f) Unit Transfers
- (i) When existing resident applies for transfer the KCHA shall perform an inspection of their current unit to determine if there is any type of infestation.
 - (ii) KCHA shall also review all records on the unit to determine if any previous infestation has occurred and treatments have been performed and the bed bugs have been eradicated. Such findings will be reported and may be considered as part of the selection criteria
- (g) Disposal of Large Items
- (i) Only items specified by the PMP servicing the unit should be disposed of.
 - (ii) Residents are to wrap infested items in plastic before moving them out of the unit and to destroy the items once they are outside to prevent others from retrieving infested items and bringing them home. Plastic wrapping material is available from the KCHA office, or KCHA staff may assist in wrapping the infested items.
 - (iii) Any infested large item left outside for trash pick-up is considered to be abandoned and will be promptly removed from the property. KCHA staff shall damage disposed items to prevent reuse by others.
- (h) Preventing Spread by KCHA Staff
- (i) When possible, KCHA staff shall meet with residents in common areas where plastic or metal furniture is available.
 - (ii) If office staff must meet with a resident in a unit, staff only brings essential items into the unit and will not sit or set items on upholstered furniture.
 - (iii) If maintenance staff must move infested items in a unit, they must wear booties and a disposable suit. They must remove and dispose of the protective clothing immediately upon completing work in the unit. Work done in a unit without wearing this protective equipment will be done at the maintenance technician's own risk.

Section 4.03 Early Detection

- (a) Residents, staff, and contractors must immediately report any bed bugs or evidence of bed bugs anywhere on the property.
- (b) Common areas such as laundry facilities, lobbies and community rooms are visually inspected by KCHA and PMP as part of the regular service. A minimum of one property-wide inspection per year is recommended.
- (c) Monitors can detect bed bugs on individual pieces of furniture by capturing bed bugs trying to get to or from the item. They work best if the legs of the piece of furniture are the only way for a crawling insect to get on and off the item. Residents may request monitors from the office.
- (d) Mattress/Box Spring Encasements
 - (i) Proper fitting fabric mattress encasements on both the mattress and box spring protect the mattress and keep bed bugs out of the interior of box springs which is very hard to inspect and treat.
 - (ii) Encasements will be made available for each resident.
 - (iii) If the resident has a bed frame, he or she should pad sharp edges that might tear the encasement. Once installed on the mattress, residents should use duct tape to tape over the zipper pull to ensure that it remains fully closed.
 - (iv) Beds should be made into "islands" to the extent that the room and furniture permit. This entails keeping the area under the bed free of clutter and pulling the bed or mattress at least 10 inches away from all walls and bedside furniture.
 - (v) Although not required, using light colored bedding makes detection easier.

Article V. Extermination Procedures

Section 5.01 Bed Bug Extermination Procedures

- (a) Notification: When notification is made by a resident / family member / manager or maintenance staff a work order is placed for treatment / inspection, which will be scheduled for the following Wednesday after written notification is provided to the resident the Friday prior to treatment.
- (b) Inspection: Is conducted by KCHA/ PMP within 24 hours of receipt of a complaint when a complaint of infestation is made, based upon staff availability.
- (c) Identification: Residents are encouraged to provide evidence by catching a sample in a baggie, jar or piece of tape for KCHA review to help identify the type of infestation. Monitors will be strategically placed in areas of the unit.
- (d) Treatment: Treatment is conducted by a PMP. Typically three treatments will occur within a period of six weeks. Additional treatments and inspection will occur based upon the level and frequency of activity during the initial process.
- (e) Extermination Notification: Residents are notified in writing with as much advanced notice as possible prior to treatment, but not less than 48 hours. An extermination notice is placed under the resident's door with preparation instructions and contact information for any questions. During the process adjacent units will also be notified for inspection and may be treated as a preventive measure.
- (f) Unit Treatment Preparation:
 - (i) Preparation requires the resident to strip the bedding on the morning of the extermination. Resident must place all linens in a trash bag to be laundered and dried with high heat. The bags are required to be disposed of directly into the dumpster and not to be re-used. Bags will be provided by KCHA.
 - (ii) During the first treatment residents will be provided mattress covers to protect beds and prevent infestation or the need for treatment. A charge for additional covers will be implemented if the original covers are removed or damaged.
 - (iii) Clear all items off the top of furniture and move items approximately one foot from the wall. They will also need to remove items off the floor in each closet.
 - (iv) Clothing, boxes, books, magazines and other items prone to infestation may be required to be disposed or placed inside plastic storage containers or plastic bags during the treatment period.
 - (v) Treatment may consist of inspecting furniture and disassembling beds and frames. Inspection of the inside of furniture including drawers, tops and bottom of tables, lamps, book cases and other items may be necessary.
 - (vi) As a precaution all children's items should be placed out of the areas scheduled to be treated and placed in protective containers or bags.
 - (vii) Pets such as dogs, cats, birds, turtles and fish need to be removed from the area of treatment for at least 4 hours thereafter.

(g) The Treatment Process:

- (i) KCHA staff will prepare areas by vacuuming and sometimes steaming items which can be difficult to visually inspect or treat thoroughly.
- (ii) Treatment will also consist of dusting outlets, drilling and treating wall voids, spraying walls along the floor and sealing cracks, crevices and holes.
- (iii) Other means of protecting furniture and other small household items are to place them inside plastic containers or bags during the process.
- (iv) Excessive storage and congestion will prevent a detailed inspection and treatment. By disposing of bags, cardboard boxes and other unnecessary items you can prevent possible nesting areas.
- (v) Residents should not remove items from the unit until the item has been approved by KCHA staff. Infested items need to be wrapped or placed in plastic bags to prevent transfer of activity. This needs to be coordinated with KCHA so others will not remove items from the dumpster or trash room area.
- (vi) Prior approval should be given by KCHA before acquiring new or used furniture to ensure the infestation in the apartment has been adequately eradicated. Residents need to know where the items are coming from and ask if there are or have been any infestation concerns.

(h) Post-Treatment Prevention:

- (i) The KCHA should be notified immediately when activity reoccurs.
- (ii) Residents should advise anyone such as family, healthcare workers, homemakers, or service agencies who may be entering their unit that there has been an infestation problem and to use caution to prevent any transfer.
- (iii) Residents should not use or apply any type of pesticides during or after treatment. Cleaning and vacuuming areas of concern are helpful. Cleaning tools should be washed with hot water and lightly treated with alcohol. Vacuum bags should be placed in another plastic bag and disposed of directly into the trash.
- (iv) Lightly spraying alcohol on insect activity or items that have been used to clean infested areas is acceptable. This should be done upon properly ventilating the area and ensuring that there is no open flame or electrical items in operation. Anyone with medical or breathing conditions needs to take extra pre-caution.
- (v) Residents should refrain from having guests during the infestation and treatment period to prevent transfer. Residents should also perform self-inspections of their apartment, furnishings and clothes to prevent any transfer when traveling to other homes, businesses etc.
- (vi) Items used on a daily basis such as pocketbooks, bags, or clothing should be placed away from areas of infestation or inside protective bags or plastic containers.
- (vii) Residents should not take any items from unknown sources or give any personal belongings away to any agency or person. When acquiring furniture and other items each should be thoroughly inspected and residents should ask if there is or have been any infestation issues with the item.

- (viii) When traveling or staying elsewhere inspect all items and wash them to prevent possible transfer.
- (ix) Continuous inspections after treatment by KCHA and the resident will assist in prevention and eradication of the infestation. This will require immediate notification to KCHA if there are signs of activity.
- (x) Determining the initial possible cause of infestation is very helpful in the prevention and eradication process.

Section 5.02 Rodent/Insect Extermination Procedures

- (a) Notification: When notification is made by a resident / family member / manager or maintenance staff a work order is placed for treatment / inspection, which will be scheduled as soon as possible after written notification is provided to the resident. Residents are notified in writing with as much advanced notice as possible prior to treatment, but not less than 48 hours.
- (b) Inspection: Is conducted by KCHA / PMP when complaints of infestation have been made and it is treated as needed.
- (c) Identification: Residents are encouraged to catch a sample in a baggie, jar or piece of tape for our review to help identify the type of infestation. Monitors will be strategically placed in areas of the unit. Treatment and preparation will vary by the type of infestation.
- (d) Treatment: Treatment is conducted by a PMP. Typically three treatments will occur within a period of one month. Additional treatments and inspection will occur based upon the level and frequency of activity during the initial process.
- (e) Extermination Notification: Residents are notified in writing with as much advanced notice as possible prior to treatment, but not less than 48 hours. An extermination notice is placed in their door with preparation instructions and contact information for any questions. During the process adjacent units may also be notified, inspected and treated as a preventive measure depending on the type of infestation.
- (f) Preparation:
 - (i) Residents are required to empty and clean the kitchen cabinets, below the bathroom sink and other areas where there are signs of activity or infestation.
 - (ii) Clearing and cleaning off the tops of the refrigerator, stove and other appliances is required for a more detailed inspection and treatment.
 - (iii) If an adjacent unit is being inspected and a preventive treatment is being conducted at minimum they will need to clear below the kitchen and bathroom sink.
 - (iv) After treatment, monitors will be placed in areas for further review and inspection. When an access or travel point has been determined these areas will be sealed by KCHA to prevent additional infestation and nesting.
 - (v) Residents with activity must also clean areas free of grease, food debris, water, and excessive storage, remove items such as bags and cardboard boxes which become nesting areas.
- (g) Upon the removal of dead insects, rodents and their debris the area MUST be thoroughly cleaned and sanitized.

- (h) Residents are encouraged not to use any sprays, powders, foggers, pesticides, or other “over-the-counter” treatments since they can counteract with the safer products used by the licensed exterminator. Cleaning, sanitizing, removing congestion and vacuuming are most effective with the eradication of insect and rodent activity.
- (i) In some cases of infestation such as meal moths, fruit flies and drain flies these insects are generally eradicated without treatment by determining the source and cleaning the areas affected.

Article VI. Record Keeping

Section 6.01 Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments.

Section 6.02 To meet the requirements of the state regulatory agency, use specific forms to record inspection and monitoring results, control efforts, and details of any pesticide application. Details include:

- (a) The target pest;
- (b) name and quantity of pesticide used;
- (c) site of application;
- (d) date of application;
- (e) time of application;
- (f) name of the applicator;
- (g) the application equipment used;
- (h) conditions present that contribute to pest infestation, and;
- (i) prevention or nonchemical methods of control used.

Section 6.03 Records will be kept on site in an IPM log along with:

- (a) Product labels
- (b) Material Safety Data Sheets (MSDSs)
- (c) Proof of registrations/licensing/insurance
- (d) The pest control contract (or pest control crew scope of work)
- (e) Service schedule
- (f) Service log/tickets
- (g) Sample preparation instructions
- (h) Educational materials for staff and residents

Section 6.04 Records must be current and accurate if IPM is to work. The objective is to create records from which programs and practices can be evaluated in order to update the IPM Plan and pest control procedures, improving the system and eliminating ineffective and unnecessary treatments.

Article VII. Tenant Notification

Section 7.01 The Knox County Housing Authority assumes the responsibility to notify residents and the site staff of upcoming treatments that will involve a pesticide application.

Section 7.02 Residents will be informed of the IPM program at the time of move-in. Move-in orientation should include a brief introduction to IPM and the resident's responsibilities in the IPM program.

Section 7.03 Unless more strict state regulations apply, notices will be posted in designated areas in the offices and delivered to residents at least 48 hours in advance of treatment and are to remain posted in accordance with instructions on the pesticide product's label.

Section 7.04 For some treatments, we will also deliver preparation instructions. Preparation instructions will be outlined in the pest action plan, but will depend on the level of infestation in the unit and the abilities of the head of the household. The head of the household is responsible for ensuring the pest management professional has access to the unit and for completing the necessary preparations, as detailed in the preparation instructions.

Section 7.05 Staff must adapt notifications or present information verbally if language or literacy limitations exist.

Article VIII. Pesticides

Section 8.01 Pesticide purchases will be limited to the amount authorized for use during the year.

Section 8.02 Pesticides will be stored and disposed of in accordance with the EPA registered label directions and State or Local regulations.

Section 8.03 Pesticides must be stored in an appropriate, secure site not accessible to residents or unauthorized personnel.

Section 8.04 A cabinet in a secure area will be utilized to store pesticides on-site. The door label should include visual signals for non-English-reading adults or children.

Section 8.05 The contractor shall not store or dispose of any pesticide product on our property.

Article IX. Resident Reporting/Preparation Compliance

Section 9.01 Pest infestations can be stopped quickly and with minimal financial consequences if all members of the IPM team (housing, residents and the PMPs) are involved early-on in the infestation.

Section 9.02 To promote resident compliance with inspecting units and reporting infestations, the Knox County Housing Authority will not charge a resident for pest control or ask him/her to discard belongings unless it is absolutely necessary for effective treatment.

Section 9.03 Management will work closely with residents that are physically unable to comply with the necessary preparation to ensure effective treatment. Documentation may be required to demonstrate inability to comply with reasonable items on the checklist.

Section 9.04 Resident compliance with preparation of their dwelling unit to be treated by either KCHA staff or a PMP is critical to the success of any given treatment.

- (a) At the onset of a reported infestation, residents will be provided instructions for preparing their unit for treatment. It is the resident's responsibility to ready the unit, or make arrangements for the unit to be prepared for treatment. A sample Bed Bug Preparation Checklist is included with this policy.
- (b) KCHA staff will conduct inspections of the unit prior to treatment to ensure the preparation requirements are being met.
- (c) If property staff determine the checklist is not being adhered to, the KCHA reserves the right to enter the unit, with proper notice, for the purpose of preparing the unit for treatment. This may include various uncluttering, bagging of personal items, removal of infested items, etc.
- (d) If a resident does not comply with the KCHA's or the PMP's preparation instructions resulting in the PMP not being able to treat the unit, the resident will be considered to be in violation of the lease.
- (e) If a resident does not comply with preparation instructions, and KCHA staff must enter the unit to assist in making the unit ready for effective treatment, the resident may be assessed a maintenance charge for the work done in the unit by KCHA staff.
- (f) Failure to prepare or allow access constitutes a serious health and safety violation for the residents of the property. In the event a resident refuses to comply with treatment protocol, thus allowing an infestation to linger and possibly spread, additional adverse action will be taken, up to and including termination of the lease.



BED BUG UNIT TREATMENT PREPARATION CHECKLIST

In order to properly treat your apartment the following items may need to be completed prior to our arrival on your scheduled date.

- Remove items on top of dressers, head boards and night stands to allow inspection and proper treatment.
- Remove all clothing, linens, comforters, and cloth items from areas being treated, wash items in hot water, dry and store in new sealed plastic trash bags.
- Remove all children's toys from area place in plastic containers or bags.
- Remove all pets from area and place in a cage or in another room not being treated, including fish, hamsters, birds etc.
- Remove all small area rugs and wash and store in sealed clean plastic trash bags.
- After or during treatment mattresses will be covered. Do not remove plastic coverings and repair any tears or holes with duct tape.
- Remove bedding on the morning of treatment and place in plastic trash bags until they are washed in hot water. Dispose of used plastic bags into dumpster and place inside new bags after cleaning.
- After treatment launder bedding weekly.
- Do not wash areas of floors where treatment was conducted to ensure prolonged activeness.
- Vacuum any areas being treated or monitored including tucks and folds of cloth coverings, cracks and crevices, inside drawers, edges of floors. Dispose of vacuum bag after each use directly in the trash dumpster.
- Do not remove infested items from your apartment to prevent further infestation. All items need to be treated and wrapped in plastic and disposed of directly into the dumpster to prevent re-use. This includes cardboard boxes, beds, furniture, books and other cloth, paper or wood items.