

# Integrated Pest Management (IPM) Policy

The Framingham Housing Authority will use Integrated Pest Management (IPM) strategies to prevent and address pest problems within our properties to maintain safe, healthy environments for residents and staff, and minimize harm to the environment. Our IPM approach uses pest proofing strategies, trash management, maintenance/housekeeping, and limited and targeted use of the least hazardous pesticides based on need to prevent and control pest issues. Excluding bed-bug treatments or the use of insect growth regulators, routine application of pesticide sprays, foggers or bombs, and organophosphate or chlorinated hydrocarbons pesticides are not permitted. Maintenance staff, pest professionals and resident services staff will coordinate to prevent and respond to pest problems. Pest professionals shall have IPM training or certification.

The IPM program will involve a baseline and annual inspection of units and common areas; monitoring of pest activity in interior and exterior spaces to guide responses; and development of building specific IPM plans. IPM plans will be reviewed annually with the pest professional and will describe:

- Pest focus areas and recommended treatment responses including maintenance repairs, removal of pest droppings, housekeeping needs, and selected and targeted use of the least hazardous pesticides;
- Preventative maintenance or trash management;
- Ongoing monitoring; and
- Recordkeeping to track treatments and related repairs.

At unit turnover maintenance staff shall inspect for evidence of pest activity, seal holes and cracks with pest proof materials, and report evidence of pest activity to the pest professional.

This policy emphasizes prompt, multifaceted action to identify, prevent, and treat problems. Resident awareness and support of this policy will help ensure its success. This policy may be amended by the Framingham Housing Authority to reflect new techniques, changes in OSHA, EPA or Contractual agreements as needed.

# **Please note that the following is not part of the IPM Policy it is procedural guidelines for the contractor to be used in procuring any new IPM Contracts**

**It is the current procedure of the Framingham Housing Authority to follow the following guidelines Integrated Pest Management (IPM) principles and practices to eliminate pest problems and maintain healthy, safe environments for residents and maintenance staff. IPM targets the underlying causes of pest infestations by depriving pests of food, water, shelter, and building access. Through pest proofing strategies, pest aware maintenance practices, trash management, and selected and targeted use of the least hazardous pesticides based on need, our IPM procedure puts the needs and safety of residents and property staff as the foremost priority.**

All properties will have an IPM Plan and an onsite IPM Coordinator. All pest vendors shall be IPM certified or trained. Elements of the procedure include:

- A. Baseline Pest Inspection and Inspection Report
- B. Property Specific IPM Plan
- C. Regular Inspections, Monitoring & Recordkeeping
- D. Resident Engagement
- E. Limited and Targeted Use of Pesticides
- F. Pest Specific Protocols

## **IPM Procedure Elements**

### **1. Baseline Pest Inspection and Inspection Report**

An initial baseline pest inspection of all interior and exterior areas shall be completed by our approved IPM trained pest professional. The IPM professional shall inspect all apartments, common areas, basements, utility rooms, management offices, maintenance shops and storage, and building exteriors. A member of our maintenance staff must accompany the pest contractor during the inspection.

The results of the initial inspection shall be documented in a report or included in the IPM plan described below. Results include: areas inspected; pest activity observed (type and location of pests, and level of infestation); problem areas; number and placement of monitoring traps; activities and conditions in the building which are contributing to existing and potential pest problems (i.e., pest related maintenance needs and housekeeping concerns); and any other information gathered during the inspection (including any inspection reports).

### **2. Property Specific IPM Plan and Recordkeeping**

Each property shall have a property specific written IPM plan prepared by our approved IPM trained pest professional. The pest professional will update the plan at least annually. The Maintenance Supervisor/IPM Coordinator must review the IPM Plan and approve it, or work with the pest professional to revise the plan based on site-specific needs. The pest professional will maintain the IPM Plan and all records.

The IPM plan will include:

1. Description of problem areas and focus units (i.e., active or historic pest problems), using the result of the baseline inspection.
2. Inspection schedule, with a minimum of annual inspections.
3. Monitoring strategies in areas with active infestations, pest evidence or conditions potentially leading to infestation, and new pest evidence.
4. Service schedule and pest control activities, including sealing pest entry holes/cracks; removing pests, debris, food and dust with High Efficiency Particulate Air (HEPA) vacuuming and steam cleaners or wet cleaning methods; and pesticide applications consistent with this procedure.
5. Recommended maintenance, trash management or structural repairs.
6. Resident housekeeping issues and recommended responses, including resident education.
7. Recordkeeping, including dated treatment log identifying dates of visits, record of monitoring device results, actions taken, pesticides applied, and problem apartments or locations.
8. Pest inspection procedures for maintenance staff during unit turnover.
9. Referral process between pest vendor and maintenance staff or property management (See tracking log in [Attachment C](#)).

### 3. Regular Inspections, Monitoring, Recordkeeping

1. The pest vendor shall at a minimum, visually inspect all properties (interior and exterior areas mentioned above) on an annual basis.
2. The pest vendor shall deploy pest monitoring equipment as needed, consistent with the IPM Plan. (See #6 below: Pest Specific Protocols).
3. Maintenance staff shall accompany the pest vendor on all inspections.
4. The pest vendor shall maintain an IPM treatment log specified in the IPM Plan and records to document coordination with maintenance and residence services staff. All records must be accessible to maintenance supervisors/IPM Coordinator.
5. At each unit turnover, maintenance staff shall inspect for evidence of pest activity, seal holes and cracks with pest proof materials, and report evidence of pest activity to the pest vendor.
6. Maintenance staff responding to work order requests shall look for evidence of pest activity and report such activity to the pest vendor.

### 4. Resident Engagement

#### 1. Notification

- a. Maintenance Supervisor/IPM Coordinator shall provide written notice to residents of pest vendor inspections, services or appointments, or the intent to apply to pesticides ideally 48 hours (at a minimum 24 hours), in advance.
- b. Maintenance Supervisor/IPM Coordinator shall provide residents with instructions on how to prepare their units for treatment or service.
- c. If bed bug treatment is scheduled, maintenance staff will inspect unit to confirm that the unit is ready for treatment.

#### 2. Resident Engagement

- a. Working in coordination with pest vendor, the Property Manager/IPM Coordinator will at least annually provide educational materials to residents in each unit.
- b. The Property Manager/IPM Coordinator in conjunction with any Resident Services Coordinator, will hold resident meetings in properties with ongoing pest challenges.
- c. Residents will work with the pest vendor and maintenance staff to reinforce resident housekeeping practices and reporting of pest problems.

## 5. Limited and Targeted Pesticide Use

1. The pest vendor will only apply pesticides based on need and not by schedule.
2. To minimize risk the pest vendor will use the least hazardous materials, with the most precise application technique.
3. The pest vendor will only apply pesticide products or product categories (e.g., baits, gels, or dusts for cockroaches) included in the IPM Plan and approved by the Property Manager/IPM Coordinator.
4. The pest vendor is prohibited from using foggers or bombs, organophosphate or chlorinated hydrocarbons, or broadcast or baseboard spray applications (unless it is an insect growth regulator or the pesticide is needed to address bedbug infestations).
5. If it is necessary to vary from the above procedures, the pest vendor will request written approval from the Property Manager/IPM Coordinator.

## 6. Pest Specific Control Protocols

Pest vendors shall follow pest specific protocols (insect, rodent, bed bug) described in the approved IPM plan and listed below.

### 1. Insect Control

- a. Only apply insecticides as “crack and crevice” treatments.
- b. For cockroaches, the preferred treatments are baits, gels, growth regulators, and boric acid. Roach bait gels will be odorless, non-volatile and will not produce airborne particles. They will be designed for use in sensitive areas and residents will not need to remove edibles or dishes from cabinets or vacate premises during application. Old, dried gel baits will be removed before application of fresh bait.
- c. During each service visit, special attention will be paid to kitchen and bath areas, including spaces beneath sinks, counters, appliances, etc.
- d. If use of insect growth regulators sprays are needed, the pest vendor will obtain approval from the site Maintenance Supervisor prior to any application of insecticide to an exposed surface or application of a spray treatment. Pest vendor will ensure resident and employee safety and employ necessary precautions for the containment of the pesticide to the site of application.
- e. Sticky traps will be used to monitor activity and evaluate indoor insect control efforts where necessary.

### 2. Rodent Control

- a. Traps are the first method of indoor rodent control. Traps will be out of general view and in protected areas so as not to be affected by routine cleaning and other operations. Pest vendor will check trapping devices on a schedule in the approved IPM Plan. All trapped rodents and all rodent carcasses will be disposed of in an appropriate manner.
- b. Obtain approval from the Site Maintenance Supervisor before rodenticide use. Use only when deemed essential and to supplement structural or mechanical controls. All rodenticides (regardless of packaging) shall be placed either in locations not accessible to children, pets, wildlife, and domestic animals or in EPA-approved tamper-resistant bait boxes. All such bait boxes shall be labeled with the pest vendors name and address and dated by the pest vendor at the time of installation and at each follow-up service.
  - i. All bait stations should be numbered and their location marked on a simple floor plan map. The pest professional should leave a copy of the map along with the pesticide’s label with the building manager.

- ii. Bait stations should be inspected during every service visit for monitoring purposes and to ensure stations are not providing harborage to non-target pests.

### **3. Bed Bug Control**

- a. Confirm bed bugs visually. Inspections should target mattresses, sheets, box springs, bed frames and headboards, as well as other furniture or bed bug harborage areas.
- b. Use moat style traps or interceptors to monitor activity around beds (used on bed legs) or other furniture. Failure to trap a bed bug does not always confirm lack of activity.
- c. Certified canine teams can be effective in detecting bed bugs. Visual confirmation is also required.
- d. Work with maintenance staff and management to address clutter or housekeeping.
- e. Mattress and box spring encasements are recommended.
- f. Treatments may include: vacuuming with HEPA filter to reduce heaving infestations (not sufficient by itself) used in conjunction with steam, heat (must reach 122° F), targeted insecticides, and/or diatomaceous earth (DE) around the interior perimeter of the unit (under baseboards, in wall voids, in drop ceilings, behind faceplates and other locations as necessary). Often a second treatment is needed.
- g. Monitor units abutting/surrounding focus/treated unit.
- h. Discarding furniture or bedding is generally not necessary. Wrap and removed furniture or bedding in plastic and label as bed bug infested.
- i. Re-inspect no sooner than two weeks post treatment to allow for new eggs to hatch.