## Template IPM policy statement

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.

### Goals

Through our IPM program, pests will be managed to

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

### Staff Affected by the IPM Policy

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. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is the staff contact for the IPM program. In addition, each site or Asset Management Property (AMP) will designate an IPM Coordinator to manage the site activities concerning the IPM program. IPM Coordinators will be responsible for the activities including, but not limited to, maintaining records and analyzing to improve the program, ensuring pesticides are applied by a licensed professional with approved products, educating staff and residents about pests and pest management, and facilitating cooperation among all individuals who have a role in pest management (the “IPM team”). The site IPM Coordinator must approve pesticides before any application.

### Definitions

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.

Application: The actual act of using a pesticide or other technique for the purpose of pest control.

Conducive conditions: An attribute of a given location that can lead to pest presence; structural conditions that contribute to an infestation.

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.

Harborage:The nesting and hiding areas of insects, rodents, and other pests. Debris and clutter often provide harborage sites.

Inspection:A systematic searching for pests, damage, stains, hair, cast skins, or other evidence to identify a pest problem and its extent.

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).

Mechanical controls: Traps, including mechanical, sticky, and light, and other tools besides pesticides that can be used to control pests.

Pest: A living organism (animal, plant, or microorganism) that interferes with human purposes for the property.

Pesticide: Any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest (U.S. EPA).

Pest Management Professional (PMP): A company licensed to provide commercial pest management services.

Sanitation: Cleaning up food, water, and clutter that attract pests and allow them to survive. Another description of sanitation is “good housekeeping.”

Treatment: Employment of procedures, application of materials, or the use of resources designed to alleviate pest problems.

### Pests

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.   
  
Common pests in this area include *(select all that apply; cross out species not found in the area):*

* Ants (Acrobat, Argentine, Carpenter, Crazy, Ghost, Imported fire ants [Red, Black, Hybrid], Little Black, Little Thief, Odorous House, Pavement, or Pharaoh)
* Cimex spp. (Bed Bugs, Bat Bugs, Tropical Bed Bug, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)
* Bees/Wasps/Hornets (Bald-faced, Honey, Eastern Cicada Killer, European Paper, Yellowjacket)
* Beetles (Cabinet/Warehouse, Cadelle, Cigarette, Confused Flour, Drugstore, Khapra, Merchant Grain, Red Flour, Sawtoothed Grain, Weevils [Granary, Rice], Yellow Mealworm)
* Birds (European Starling, Pigeon/ Rock Dove, Gull)
* Cat Fleas
* Cockroaches (American, Asian, Australian, Brown-banded, German, Oriental, Smoky Brown)
* Earwigs
* Flies (Blow/Bottle, Cheese Skipper, Cluster, Deer, Drain/Moth/Filter/Sewage Gnat, Fruit/Vinegar, Fungus Gnats, Horse, House, Phorid, Sphaerocerid, or Stable)
* House Centipedes
* Mice (House, Deer/White-footed)
* Millipedes
* Mosquitoes
* Moths (Angoumois Grain, Indian Meal)
* Pillbugs and Sowbugs
* Rats (Norway, Roof/Black)
* Silverfish and Firebrats
* Spiders (Black Widow, Brown Widow, Brown Recluse)
* Termites (Drywood, Eastern Subterranean, Formosan Subterranean)
* Ticks (Lone Star, Blacklegged/Deer, American Dog, Brown Dog)
* Wildlife: Feral Cats, Bats (Little Brown, Big Brown), \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Other \_\_\_\_\_\_\_\_\_\_\_\_\_

### Pest Management

Pest management strategies must be included in an approved IPM Plan for each site. The IPM Plan will be developed with assistance from a qualified IPM expert who is certified by QualityPro (offering the GreenPro Service), GreenShield, EcoWise, or similar program. 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.

### Integrated Pest Management Procedures

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.

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.

1. 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.
2. For each pest species at each site, set an action threshold—the pest population level at which control actions must be employed.
3. Consider a range of potential treatments for each pest problem. Employ nonpesticidal 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.
4. Determine the most effective treatment time, based on pest biology and other variables, such as weather, resident schedule, seasonal changes in wildlife use, and local conditions.
5. Design and construct indoor and outdoor areas to reduce and eliminate pest habitats.
6. Modify management practices, including watering, mulching, waste management, and food storage.
7. Modify pest ecosystems to reduce food and living space.
8. Use physical controls such as hand-weeding, traps, and barriers.
9. Use biological controls (introducing or enhancing pests' natural enemies).
10. 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. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents. When it is determined that a pesticide must be used to prevent pest levels from exceeding action thresholds, choose the least-hazardous material(s). Least toxic pesticides are those labeled with the signal word “CAUTION.” 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. 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.
11. Conduct ongoing educational programs:
12. Acquaint administrative personnel, staff, pest managers, and residents with pest biologies, the IPM approach, and procedures used to achieve the IPM program goals.
13. Inform the public of our attempt to reduce pesticide use and respond to questions from the public about our pest management practices.
14. Monitor treatment to evaluate effectiveness. Keep monitoring records and include them in the IPM log book for at each site.

### Record Keeping

Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments. 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 the target pest, name and quantity of pesticide used, site of application, date of application, time of application, name of the applicator, the application equipment used, conditions present that contribute to pest infestation, and prevention or nonchemical methods of control used. Forms should be unit/area-specific in order to identify trends over time. Records will be kept on site in an IPM log along with

* Product labels
* Material Safety Data Sheets (MSDSs)
* Proof of registrations/licensing/insurance
* The pest control contract (or pest control crew scope of work)
* Service schedule
* Service log/tickets
* Sample preparation instructions
* Educational materials for staff and residents

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.

### Notification

We take the responsibility to notify residents and the site staff of upcoming treatments that will involve a pesticide application. 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. 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.

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.

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

### Pest Management Professionals (PMPs)

PMPs must be educated and trained in the principles and practices of IPM. Evidence of training include years of experience along with continuing education at conferences, seminars, or e-learning classes. PMPs must follow regulations and label precautions including those pertaining to notification and recordkeeping. Applicators must be certified by the state, comply with this IPM Policy, and fulfill the site IPM Plan. Certification and regulations also apply to maintenance or renovation contractors who may encounter pests during their work. Under no circumstances should PMPs sell, share, or make available any pesticide products to any non-licensed residents or staff.

#### For properties with in-house pest control programs

Pesticide purchases will be limited to the amount authorized for use during the year. Pesticides will be stored and disposed of in accordance with the EPA registered label directions and State or Local regulations. Pesticides must be stored in an appropriate, secure site not accessible to residents or unauthorized personnel. A cabinet in a secure area with a locked and labeled door is advised. The door label should include skull and crossbones, Mr. Ugh, or other visual signals for non-English-reading adults or children.

#### For properties that contract for pest control services

The contractor shall not store or dispose of any pesticide product on our property. **Sources**

EcoWise IPM Contracting Tool Kit

<http://www.ecowisecertified.org/toolkit/>

Establishing IPM Policies and Programs: A Guide for Public Agencies

<http://ucanr.org/freepubs/docs/8093.pdf>

GreenPro Certified: understanding and complying with the green service standard

<http://www.npmagreenpro.org/download2.asp?FileName=GPC_Standards.pdf>

Illinois Department of Public Health

<http://www.idph.state.il.us/envhealth/ipm/Sample_Policy_Statement.pdf>

IPM: A Guide for Managers and Owners of Affordable Housing

[http://www.bphc.org/hpfhi/SiteCollectionDocuments/English Documents/IPM Guide for Owners and Managers.pdf](http://www.bphc.org/hpfhi/SiteCollectionDocuments/English%20Documents/IPM%20Guide%20for%20Owners%20and%20Managers.pdf)

San Francisco Environment Code

<http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances11/o0007-11.pdf>

StopPests in Housing Program

[http://www.stoppests.org/what-is-ipm/using-ipm/ - policy](http://www.stoppests.org/what-is-ipm/using-ipm/#policy)

UFL Integrated Pest Management Policy and Treatment Options for University Housing <http://ipm.ifas.ufl.edu/pdf/ipm_housing_guides.pdf>