August 25, 2016

Lourdes Castro Ramirez
Principal Deputy Assistant Secretary for Public and Indian Housing
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

Dear Principal Deputy Assistant Secretary Castro Ramirez:

The National Association of Housing and Redevelopment Officials (NAHRO) represents more than 3,100 agencies and over 20,000 individual members and associates. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire inventory. NAHRO works to support policies that promote regulatory and administrative relief to housing authorities so that they may best meet the needs of their communities. As mentioned in an earlier conversation that you shared with John Bohm, Acting CEO of NAHRO, many of our members are currently facing financial strains resulting from their efforts to successfully eradicate bed bugs from their housing units. As you know, bed bugs are a serious concern for public housing agencies (PHAs) across the country, from rural towns to big cities, and their extermination can be quite challenging, time-intensive, and costly. NAHRO would like to take this opportunity to shed more insight into the financial concerns our members face when confronted with bed bugs in their properties and units.

Bed bugs are extremely difficult to exterminate. They are small, flat, and adept at hiding in small spaces that often go unnoticed, including behind loose wallpaper or under electrical switch plates. To successfully eradicate a bed bug infestation, each and every bed bug must be located and exterminated as they multiply quickly. Only a few bed bugs are needed to create an infestation. Furthermore, bed bugs can quickly spread between housing units, exacerbating an already challenging problem.

The most common method for eradicating bed bugs is through heat. This is a much more complex and expensive process than standard extermination methods used to eradicate other pests. Eradicating bed bugs through heat requires heating the interior of a home or unit to a temperature that bed bugs cannot survive in, typically 140 degrees Fahrenheit. This type of treatment is preferable as exterminators are not required to locate bed bug nests to eradicate them as the heat is consistent throughout the home. The use of heat to exterminate bed bugs takes time, must be monitored, and can be costly. If not carefully watched, bed bugs may survive what was thought to be a lethal amount of heat. Due to the extreme heat, residents are not able to access their homes while they are being treated. Furthermore, if they were allowed to access their homes, bed bugs could attach themselves to...
the resident and escape only to re-infest the unit. As such, PHAs must find locations for residents to wait while they are unable to access their homes. PHAs can perform this heat eradication method on their own, however the cost for the heating unit can be financially prohibitive, and most PHAs hire professionals to perform this method. This comes as a great expense to the PHA, which often must pay for multiple units to be heated.

Units with bed bugs must also go through a thorough cleaning as well. This should include the following:

- Cleaning bedding, linens, curtains, and clothing in hot water and drying them on the highest dryer setting. Placing stuffed animals, shoes, and other items that can't be washed in the dryer and running on high for 30 minutes.
- Using a stiff brush to scrub mattress seams to remove bed bugs and their eggs before vacuuming.
- Vacuuming beds and the surrounding area frequently. After vacuuming, immediately placing the vacuum cleaner bag in a plastic bag and placing the bag in an outdoor garbage can.
- Encasing mattresses and box springs with a tightly woven, zippered cover to keep bed bugs from entering or escaping for at least a year to make sure all bed bugs in the mattress are dead.
- Repairing cracks in plaster and gluing down peeling wallpaper to get rid of places bed bugs can hide.
- Removing clutter from around the bed.

It is often recommended to purchase a new mattress once all bed bugs are removed from a home.

After cleaning, it is then recommended to use chemical treatments to ensure the eradication of any bed bugs that were missed. As treating beds and bedrooms with insecticides can be harmful, treatment of bed bugs requires products that are safe for humans, which are often more costly than other forms of chemicals used to eradicate pests.

In light of the additional effort required to eradicate bed bugs from housing units and properties, bed bug infestations place substantial financial burdens on PHAs. This financial strain can be even greater for small PHAs compared to their larger counterparts as they have fewer resources to utilize. NAHRO has heard concerns from our members across the country that their PHAs are unable to bear the cost of bed bug eradication, especially in light of the draconian cuts they have seen to their programs over the past years. Our members also note that the risks of bed bugs increases with exposure to visitors, staff, inspectors, and so on. Bed bug infestations occur quickly across multiple units and properties, substantially increasing eradication costs.

Bed bugs affect more than just the tenants in an impacted unit. Often maintenance personnel and other staff become impacted as well. Maintenance staff that enter units to either complete a repair or to clean the unit can become in contact with bed bugs, and then take the bed bugs back to their homes inadvertently. As a result, the staff member must then have his home treated for bed bugs as well. Our members note that this results in additional costs for housing authorities who become responsible for covering the costs for pest extermination for their staff. Although PHAs have not yet been required to fall back on insurance to cover these costs, it will be problematic when they are ultimately required to do so. If increased insurance claims are filed to mitigate the additional costs of
treating the homes of maintenance staff for bed bugs, insurance premiums will most likely rise. Again, in these times of significant funding shortfalls, any additional cost increase for PHAs will easily lead to financial strains, especially for smaller PHAs.

NAHRO looks forward to continuing to work with HUD regarding this issue to ensure that PHAs can remain financially secure while also ensuring their tenants have access to safe, secure housing free of bed bugs. We thank you for the opportunity to discuss this matter with you and look forward to working toward solutions in the future through either changes to HUD regulations that would allow the Department to treat bed bug infestations differently than normal infestations or through additional funding from Congress.

Please feel free to contact me at 202-580-7213 if you have any questions or would like to discuss this further. Thank you for your time and consideration on this important matter.

[Signature]

Eric Oberdorfer
Policy Advisor, Public and Affordable Housing