

## Exhibit 21

# INTEGRATED PEST MANAGEMENT (IPM) POLICY

Bastrop Housing Authority is committed to managing pests using Integrated Pest Management (IPM). IPM programs focus on preventative measures – getting at the root of the problem before infestation occurs. 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, using non-chemical methods as the first line of defense and chemicals only when determined necessary.

IPM principles are implemented by using the most economical means and with the least possible hazard to people, property and environment. In order to successfully eradicate infestation, it is essential that residents, pest management professionals and BHA staff cooperate and work together. The residents' role in IPM is just as important as the pest management professional's role. Residents must be aware of the importance of housekeeping and letting the pest management professional in for monitoring and control.

### IPM TO PREVENT AND ELIMINATE PESTS SAFELY

#### **Step One: Education, Inspection and Monitoring**

If you have pests, determine what kind of pests you have and where they are coming from. Pests may include roaches, ants, wood destroying insects, rodents, bed bugs, etc. Each pest has different habits so it's important to "know your enemy!" and treat them accordingly. For example:

**German roach (or cockroach)** - Roaches leave behind dark fecal spots in areas where they congregate. In a heavily infested home, you can see the characteristic spotting along edges of kitchen cabinets and in corners, on top of door frames and in other out-of-the way places where roaches hide, such as behind pictures frames on the wall. These fecal spots work like trails to attract other roaches and contain an aggregation pheromone which other roaches "sniff" out using their antennae. The pheromone tells newly arriving roaches that this is the spot to find food, water, hiding places and others of their kind.

**Rodents** - Signs of mouse infestation include droppings, gnawed plastic or paper and rodent sightings. House mice also emit musky odors. These signs help homeowners to identify nesting areas, which are made from shredded fibers and other found materials. They are commonly found in undisturbed areas such as shoeboxes and storage crates.

**Bed Bugs** - Although bedbugs are not known to carry disease, they cause a lot of stress to people and can be the cause of skin infections and allergic reactions. Active infestations will have live or dead bedbugs, shed skins or bedbug eggs and fecal spotting on mattresses, clothing or in dark cracks or crevices. Bedbugs can be found in bedding, bed frames, mattress seams, upholstered furniture, wood furniture (especially along areas where drawers slide), curtains and draperies, along window and door frames, ceiling and wall junctions, behind and around wall hangings, cracks and crevices in walls, floors or baseboard, inside electronic devices such as smoke and carbon monoxide detectors. Always inspect for the signs of bedbugs when traveling away from home.

Many people are uninformed about bed bugs and what must be done to eradicate this pest. An infection of bedbugs can begin from any number of sources including:

- Used furniture or other second-hand items
- Friends and family or other professionals that visit the home
- Staying in hotel/motel or visiting homes that have bed bugs

## Step Two: Prevention

All pests look for food, water, warmth, shelter (a hiding place) and access to get in. By understanding what they want, you can take it away. **This is the most important step in IPM and prevention!**

- Keep your apartment clean and free of clutter at all times.
- Never allow laundry to pile up on the floors.
- Never allow dirty dishes to pile up in sink or on counters. Wash and put away dishes nightly.
- Wipe down all countertops and stove and sweep kitchen and dining room floors nightly to remove crumbs or other food sources.
- Store all food in tightly sealed containers or in the refrigerator. Never allow food to be left out overnight.
- Do not leave your pet's food bowl or water bowl out overnight. Pick these up nightly and return them each morning. Store bags of pet food in tightly sealed containers.
- Do not store cardboard boxes or paper bags in the unit. Replace with plastic boxes if you need storage.
- Get rid of excess magazines and newspapers.
- Get rid of clothing or other items you no longer use.
- Place household trash inside a plastic trash bag and store in a closed container (trash can with lid). Remove all trash from the unit nightly.
- Carefully inspect any items brought into the home to ensure you are not bringing pests in with them.
- Use soap and warm water to remove any roach feces from walls, doors and cabinets. Fecal spotting contains aggregation pheromone which attracts other roaches.
- When traveling, take a few minutes upon arriving to thoroughly inspect accommodations to ensure they are bed bug free before you unpack your luggage. Upon departing for home, inspect luggage and belongings again since bed bugs can easily travel from one room to another.
- Report all plumbing or water leaks immediately.
- Report any entry points such as gaps in walls, pipes or other areas so that they can be caulked.
- Participate in actively monitoring and inspecting for pests.

### Additional Prevention for Bed Bugs

- Do not bring discarded furniture or other secondhand items from unknown sources home unless the determination can be made with absolute certainty that the items are bed-bug free. You should always assume nice furniture set out at the curb may have been discarded due to bed bugs.

- Inspect used or rental furniture and other secondhand items for bed bugs before bringing it home. Used furniture or refurbished mattresses may have bedbugs and bedbug eggs that are difficult to see.
- Inspect in and around sleeping and resting areas in the home at least once a month to ensure that mattresses, box springs, frames, headboards are not infected with bedbugs. Beds should be 'made into islands' to the extent that the room and furniture permit:
  - Move the bed at least 6 to 10 inches away from the wall.
  - Make sure all bedding is tucked under mattress and does not touch the floor.
  - Remove any items that are stored under the bed
  - Encase each mattress and box spring in a sealed plastic cover of high quality and is sturdy enough to last for a year to limit exposure to bedbugs or dust mites. Bed bugs trapped inside will eventually starve to death and other bed bugs won't be able to hide in the bed or box spring.
    - Take care that these covers have zippers that close completely and use duct tape over the zipper pull to ensure that it will remain fully closed.
    - Be sure to pad any sharp edges on the bed frame that might tear the cover.
- Thoroughly vacuum apartment and furniture regularly and use crevice tools and other attachments when feasible. Place the contents of the vacuum in a tightly sealed disposable bag and immediately remove from unit for the next normal trash collection.
- If contact with an active bedbug infestation is suspected while away from home or after visitors, segregate and isolate any exposed luggage, clothing and personal effects in sealed plastic bags until decontamination can be completed.

Early detection is critical and reporting of any pest infestations by residents to management limits the spread of bedbugs or other pests. The longer you wait, the more likely the problem is to spread and the more difficult and costly it will be to control.

**Step Three: Involving a Pest Management Professional**

Once an infestation is confirmed by staff, staff will schedule a Pest Management Professional to inspect and possibly treat the infested unit and adjacent units. BHA staff will work with the Pest Management Professional and resident (and the resident's family or support service provider) to ensure that everyone involved understands the preparation instructions, discuss any of the resident's medical issues that may impact the treatment plan and discuss how to prevent further infestations.

After inspecting the infested unit and (when an active infestation is found) all adjacent units, the Pest Management Professional will propose a treatment plan to the property manager for approval. Appropriate treatment will be determined by the PMP based the type of pest and severity of infestation and may include a combination of the following treatment methods:

**Non Chemical Treatment**

- Non chemical treatment may involve using monitors, traps and baits, along with less toxic dusts such as boric acid. Traps and baits shall be put close to the pest's hiding place but out of reach from children or pets.

- Baseboards, cracks, crevices, heat, plumbing and electrical services shared between apartments shall be sealed with pest-proofing sealants. Electrical outlet boxes, and similar voids that cannot be readily sealed, may be treated with an appropriately labeled insecticidal dust.
- Additional or alternative physical control measures against bedbugs may include placing bed bug interceptors under each leg of the bed to trap bedbugs that try to climb up the leg of the bed.

### **Chemical / Heat Treatment**

- A residual insecticide being applied, according to label directions, to each infested sites. Such applications often involve treating cracks and crevices. Such treatments may include examining and treating the opposite side of any involved wall, floor or ceiling.
- Insect growth regulator (IGR) may be used as a concurrent or adjunctive treatment (i.e. as a tank mix).
- Limited use of an aerosol or ULV pyrethroid may facilitate the detection of hidden pests by causing them to move around more, and may also potentially increase their exposure to any previously applied residual insecticide. *DO NOT use any over-the-counter “foggers.” They are not very effective and may cause bedbugs or other pests to scatter and could be dangerous.*
- Fumigation \* *Do NOT use any over-the-counter “foggers.” They are not very effective and may cause pests to scatter and could be dangerous.*
- *Heat Treatment*

Re-inspection of infested structures after initial treatment may be required to precisely target the treatment of any continued infestations.

### **Step Five: Preparing for Treatment**

Tenant agrees to provide access to all areas recommended for treatment and properly prepare unit for treatment as follows:

#### **German Roach Fogging**

- Tenant agrees to empty all kitchen cabinets (upper and lower) and drawers. All items from cabinets and drawers should be placed on dining room table or living room floor and covered with a sheet.
- Tenant agrees to remove everything from kitchen counters. All items from countertops should be placed on dining room table or living room floor and covered with a sheet.
- Tenant agrees to empty all bathroom cabinets and drawers. All items from cabinets or drawers should be placed on bed or side tables and covered with a sheet.
- Tenant agrees to remove pets prior to treatment. Fish tanks should be covered and air pump turned off during treatment
- Tenant agrees that the unit will remain unoccupied during treatment and for a period of 3 hours from the time treatment is completed.
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- Tenant agrees to comply with additional preparation instructions may be given at the time

service is scheduled.

- Tenant agrees to wipe counters and cabinets after service with any cleaner you choose prior to putting items back in the cabinets.
- Tenant agrees to use soap and warm water to remove any fecal spotting on walls, door frames, cabinets, etc.
- The service may need to be repeated as necessary.

### **Flea Service**

- Tenant agrees to remove all clutter, excessive storage, and personal belongings on floors and furniture to allow treatment prior to arrival. Such items will restrict treatment procedures and results.
- Tenant agrees to treat pets for fleas at the same time as service. Pets must be on a flea treatment such as Frontline, Advantage, Advantix, etc. See your veterinarian for recommendations.
- Tenant agrees to vacuum carpeting including under all furniture and beds and clean vinyl tile floors daily before service and daily 24 hours after service. Immediately after cleaning, remove the vacuum bag or canister and place the contents in a bag that can be completely sealed and take the sealed bag to a trash container away from the home. Continue for 2 – 3 weeks after treatment. The vacuum's mechanical pressure will improve effectiveness of the insecticide by stimulating un-hatched fleas to emerge from their protective pupae cases.
- Tenant agrees to wash or dispose of all pet bedding. If laundering, wash separately from other linens.
- Personal items and belongings will NOT be treated. It is recommended that you follow manufacturer's specifications for cleaning all personal items or consult with a professional cleaning company for recommendations. We cannot provide specific instructions or techniques for personal items; however, in general we suggest using hot water for cleaning and using a clothes dryer that reaches a temperature of 120 degrees.
- Tenant agrees to advise the Pest Management Professional where pets sleep, rest and eat.
- Tenant agrees to remove pets prior to treatment. Fish tanks should be covered and air pump turned off during treatment
- Tenant agrees that the unit will remain unoccupied during treatment and for a period of 3 hours from the time treatment is completed.
- Tenant agrees to comply with any additional preparation instructions that may be given at the time service is scheduled.
- Tenant agrees to wipe counters and cabinets after service with any cleaner you choose prior to putting items back in the cabinets.
- The service may need to be repeated as necessary.

### **Bed Bug Service**

The Pest Management Professional shall inspect the unit and propose the best treatment plan to eradicate bed bugs which may include heat, chemicals or a combination of the two.

### **Bed Bug Service - Heat Treatment**

- Tenant agrees that during the time required to heat the structure, the potential for damages to furnishings and fixtures is practically non-existent. Tenant agrees to take precautions

that include, but are not limited to:

- ✓ People, plants and pets, including fish and/or tanks must be removed from the residence prior to service. *People should leave with only the clothes they are wearing. Personal belongings such as purses, luggage or other items may contain bed bugs that could be brought back and re-infest the unit.*
- ✓ All medicines and vitamins should be placed in the refrigerator.
- ✓ Fresh fruits and vegetables, chocolates, wines/liquors, artificial sweeteners, should be placed in the refrigerator.
- ✓ Wax based or paraffin-based items (make-up, lipstick, candles, wax figurines, crayons) should be placed in the refrigerator
- ✓ Tenant agrees that small appliances, computers, and all other electronics shall be unplugged from the wall prior to treatment.
- ✓ Tenant agrees all clothing or other cloth items present during the heat treatment will be placed loosely in laundry baskets to allow the heat to penetrate.
- ✓ Tenant agrees that waterbeds must be drained or disassembled to allow the frame to reach the proper temperature.
- ✓ Tenant agrees that airbeds must be partially deflated to avoid damage and any electric pumps must be unplugged from the outlets.
- ✓ Tenant agrees to discuss any items such as antique furniture, vinyl or plastic items, wooden or stringed musical instruments, etc. with the Pest Management Professional to ensure that proper care is taken to prevent damage from heat.
- ✓ Vinyl mini-blinds that may sustain damage during heat treatment will be replaced.

- BHA agrees to remove the following prior to heat treatment
  - ✓ Vinyl ceiling-mounted fan blades
  - ✓ Florescent light covers
  - ✓ Batteries will be removed from smoke and carbon monoxide detectors

Once heat treatment is completed:

- ✓ Tenant agrees to remove the clothes they are wearing and immediately launder them to prevent re-infestation.
- ✓ Tenant agrees to use a vacuum cleaner (preferably HEPA-filtered) to remove any bed bugs and their cast skins from all observed and suspected harborage sites upon return to the unit and once a week thereafter. The vacuum bag should be removed immediately afterward and sealed tightly in a plastic bag and taken immediately from the unit to the outside trash can.
- ✓ Tenant agrees to comply with any additional preparation instructions that may be given at the time service is scheduled.

### **Bed Bug Service - Chemical Treatment Only**

- Tenant agrees that the areas to be treated will be free of clutter, excessive storage and

personal belongings on floors and furniture will restrict treatment procedures and results.

- Tenant agrees that all closets, dressers, drawers and nightstands must be empty of all clothing and other personal items.
- Tenant agrees that all personal items, toys and all other washable children's items must be cleaned per labels and put in sealed containers that prevent possible bedbug re-infestation.
- Tenant agrees to launder and seal cloth items. Personal items and belongings will NOT be treated. It is recommended that you follow manufacturer's specifications for cleaning all personal items or consult with a professional cleaning company for recommendations. We cannot provide specific instructions or techniques for personal items; however, in general we suggest using hot water for cleaning and using a clothes dryer that reaches a temperature of 120 degrees.
- Isolate and contain items that have been properly cleaned, laundered or heat treated to prevent re-infestation. Heavy duty plastic bags or air tight containers may be used for this purpose. Clear bags and containers are preferable. Carefully reintroduce cleaned items.
- Tenant agrees that all non-washable items must be carefully inspected for bedbugs.
- Tenant agrees to vacuum carpeting including under all furniture and beds and clean vinyl tile floors daily before service and daily 24 hours after service. Immediately after cleaning, remove the vacuum bag or canister and place the contents in a bag that can be completely sealed and take the sealed bag to a trash container away from the home. Continue for 2 – 3 weeks after treatment.
- Tenant agrees to remove pets prior to treatment. Fish tanks should be covered and air pump turned off during treatment
- Tenant agrees that the unit will remain unoccupied during treatment and for a period of 3 hours from the time treatment is completed.
- Tenant agrees to wipe counters and cabinets after service with any cleaner you choose prior to putting items back in the cabinets.
- Tenant agrees to use a vacuum cleaner (preferably HEPA-filtered) to remove the bed bugs and their cast skins from all observed and suspected harborage sites and once weekly thereafter. The vacuum bag should be removed immediately afterward, sealed tightly in a plastic bag and that bag removed from the unit and placed in the trash can outside for normal trash collection.
- Mattresses or box springs that can be successfully treated must be immediately sealed in an industrial mattress cover upon treatment.
- Tenant agrees that the Pest Management Professional will attempt to treat mattresses, box springs, upholstered furniture or other items in the unit. However, it may be necessary to discard items specified by the Pest Management Professional as being infested and absolutely necessary for effective treatment. If items must be discarded, tenant agrees to wrap the items in plastic before moving them out of the unit and shall destroy the items once outside to prevent others from retrieving the infested items and taking them home

*NOTE: Any large items left outside for trash pickup will be considered infested and may be destroyed by BHA staff using a utility knife or other means and removed from the property.*

- Tenant agrees to comply with any additional preparation instructions that may be given at the time service is scheduled.
- Tenant agrees that the service may need to be repeated as necessary.

**Cooperation:**

Bastrop Housing Authority expects tenant cooperation in the process of education, inspection, detection, prevention and elimination of pests. Tenant agrees to cooperate with management and the Pest Management Professional in the treatment plan and will prepare the unit for scheduled treatment as instructed. The tenant shall be required to pay for and follow the instructions provided by the Pest Management Professional for proper treatment of all personal items, including pets. The tenant will not be reimbursed the cost of additional expense to the household, such as purchase of new furniture, clothing or cleaning service.

**Termination of Tenancy:**

Bastrop Housing Authority retains the right to terminate resident’s tenancy and require residents to vacate the rental unit in the event that the:

- 1. Tenant’s action or inaction contribute to or result in recurring infestations.
- 2. Tenant’s action or inaction prevents treatment of an infestation.
- 3. Tenant fails to comply with the requirements of this policy.

If Bastrop Housing Authority terminates the tenancy according to this policy and tenant vacates within seven (7) days of such notice of termination, the tenant shall be released from any future financial obligations pursuant to the Lease unless the infestation is caused or worsened as a result of the tenant’s actions or inactions, or as a result of a tenant preventing or hindering treatment.

X \_\_\_\_\_  
**Resident**

X \_\_\_\_\_  
**Resident**

\_\_\_\_\_  
**Housing Representative**

\_\_\_\_\_  
**Date**

*Bastrop Housing Authority does not discriminate against persons on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities.*