

Chicagoland Apartment Association Testimony
Judith Roettig
Subcommittee on Bed Bugs
September 1, 2011
Request to be entered into the meeting minutes

First, I want to thank Tony Hernandez, IHDA, for his work on rewriting the “Responsibility for Bed Bug Management in Rental Dwellings” in a more concise and balanced manner.

Because of time limitations with two versions, my comments are specific to both Curt’s original draft report and makes reference to Tony Hernandez’s version on “management in rental dwelling units”

Draft report comments

Page 1 first paragraph

“Render us more susceptible to disease” - reference CDC 2010 – what page # is this reference on?

Figure 1 - can years reported on be more clearly identifiable (month numbers run together). 30% of an average of 50 calls monthly is only 15 – am I reading this right? Not a compelling number given that there are 1.1 Million rental units in Illinois. CAA does not dispute the fast paced resurgence of infestations in Illinois but that the Orkin and Hendricksen 2011 reports make the case more effectively than the IDPH graph.

Page 2 – eliminate reference to rental furniture. They have not been given information or opportunity to review and present industry information to the subcommittee

Page 2 – include list of other state bed bug committees and legislation that the subcommittee “perused” and list them under Literature cited

Page 2 Public Awareness

Include the definition of Integrated Pest Management – recommend either CDC definition in CDC 2010 or Virginia Tech definition supplied in CAA December testimony.

No detail given on what Key Points will be addressed in the public awareness campaign something CAA has asked for repeatedly. I recommend that the subcommittee review Appendix B – Core Education Messages (NYC 2010)

Page 3 – Responsibility for Bed Bug Management in Rental Dwellings

My references are specific to Tony Hernandez rewrite

First paragraph

“While landlords are ultimately responsible for treating and managing” -change to coordinating treatment - delete the rest of the sentence.

Item 1) bed bug pamphlet – in addition to what is mentioned it should include a photograph of bed bug life stages, a list of signs of infestation and common harborage locations, prominent instructions to report to the landlord and signs of infestation , landlords right of access, tenant's responsibility to cooperate with PMP instructions and identification of tenant high risk behaviors

CAA continues to urge that all stakeholders, including landlords, have the right to review the pamphlet prior to publication and required distribution

Item 2) again change manage to coordinate treatment wherever mentioned in the document

- 1) The specific timeline stated does not seem consistent with draft report. Meeting such a specific timeline might be very difficult for many landlords when a tenant doesn't cooperate, allow access or prepare for treatment timely or failure of a PMP to not meet the timeline obligations stated
- 2) signed by both parties again can be difficult and is not a requirement in other tenant landlord law – not all properties have on site managers or maintenance so signed by both parties might delay the a landlords coordination of the infestation management process

The rewrite is a more balanced and clearly written approach. CAA urges that the rewrite be presented as best practices and guidelines for tenants and landlords separately as a means to assist both parties in their roles in the management of an infestation including what to do and what not to do including high risk behaviors.

What isn't included?

Government's role is finding more cost effective and safe solutions to managing bed bug infestations

Lack of emphasis on cost burden for Illinois landlords and the ramifications that could include losing their properties. Rents can't always to increased – the market determines rent levels in many submarkets and communities. Landlords can rarely raise rent, dollar for dollar, when cost to maintain a property increases.

Bed Bugs hitchhike into buildings on people and their possessions but identifying who and how is almost impossible. However, landlords should be able to hold tenants accountable for lack of cooperation and unit preparation if tenants have been informed properly at lease signing and in the pamphlet approved by landlord organizations.

CAA continues to reserve the right to present a dissenting opinion once the final report is written.