

PEST MANAGEMENT OPERATIONS PROGRAM

1. SUMMARY OF MAJOR CHANGES: This directive updates:

a. Paragraph 2: Specifies who serves as the Department of Veterans Affairs (VA) medical facility Pest Management Officer (PMO) and removes the designee option.

b. Paragraph 2: Defines and states responsibilities for the VA medical facility PMO and VA medical facility Pest Management Professional.

c. Paragraph 2: References the Environmental Programs Service (EPS) Bed Bug Management Guide.

d. Paragraph 4: Updates information about the EPS Integrated Pest Management Operations Plan.

2. RELATED ISSUES: VHA Directive 1850, Environmental Programs Service, dated March 31, 2017; VHA Directive 7707, VHA Green Environmental Management System and Governing Environmental Policy Statement, dated April 1, 2021; VHA Directive 1850.06, Waste Management Program, dated July 22, 2022; VHA Directive 1608, Comprehensive Environment of Care Program, dated June 21, 2021.

3. POLICY OWNER: The Office of the Assistant Under Secretary for Health for Support (19) is responsible for this directive. Questions may be addressed to the Director, EPS at VHA19hefcaction@va.gov.

4. RESCISSION: VHA Directive 1850.02(1), Pest Management Operations, dated April 6, 2017, is rescinded.

5. RECERTIFICATION: This Veterans Health Administration (VHA) directive is scheduled for recertification on or before the last working day of December 2027. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

6. IMPLEMENTATION SCHEDULE: This directive is effective upon publication.

December 22, 2022

VHA DIRECTIVE 1850.02

**BY DIRECTION OF THE OFFICE OF
THE UNDER SECRETARY FOR HEALTH:**

/s/ Alfred A. Montoya Jr., MHA, FACHE
Acting Assistant Under Secretary for Health
for Support

NOTE: All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.

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PEST MANAGEMENT OPERATIONS PROGRAM

1. POLICY

It is Veterans Health Administration (VHA) policy that Department of Veterans Affairs (VA) medical facilities effectively implement a pest management program that follows Integrated Pest Management (IPM) principles and promotes safe, efficient and environmentally preferred strategies, thereby preventing or controlling disease vectors and other pests that may adversely affect health, impede operations or damage property. **AUTHORITY:** 38 U.S.C. § 7301(b).

2. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Assistant Under Secretary for Health for Support.** The Assistant Under Secretary for Health for Support is responsible for establishing policy and providing guidance and oversight as necessary to ensure the timely and successful implementation of this directive.

c. **Assistant Under Secretary for Health for Operations.** The Assistant Under Secretary for Health for Operations is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Services Networks (VISNs).

(2) Assisting VISN Directors to resolve implementation and compliance challenges in all VA medical facilities within that VISN.

(3) Providing oversight of VISNs to ensure compliance with this directive and its effectiveness.

(4) Coordinating with the VISN Directors and VA medical facility Directors to ensure VA medical facility IPM programs address Veterans' safety and meet the requirements of Federal (e.g., Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA)), State and local regulations.

d. **Executive Director, Healthcare Environment and Facilities Programs.** The Executive Director, Healthcare Environment and Facilities Programs (HEFP), is responsible for:

(1) Overseeing the VHA pest management program.

(2) Periodically assessing the VHA pest management program and system for continued need, currency and effectiveness.

(3) Coordinating with the Assistant Under Secretary for Health for Operations, VISN

Directors and VA medical facility Directors to ensure all necessary action is taken and funding is obtained to address pest management program performance in a manner that meets the requirements of Federal (e.g., EPA, OSHA), State and local regulations; and VA and VHA directives.

e. **Director, Environmental Programs Service.** The Director, Environmental Program Service (EPS) is responsible for:

(1) Supporting and managing the VHA pest management program, including:

(a) Providing technical support to the VA medical facilities (e.g., supporting VA medical facilities with implementation of their Integrated Pest Management Operations Plan (IPMOP)).

(b) Managing the national contract for training required by the VA medical facility Pest Management Officer (PMO). **NOTE:** *For additional information about training, see paragraph 5.*

(c) Managing the contract for reach-back capabilities with professional entomologists.

(d) Addressing issue briefs related to pest infestations and issues, as necessary.

(2) Developing and implementing pest management directives and guidance documents related to the IPMOP and bed bugs. The IPMOP template is available at: <http://vaww.hefp.va.gov/resources/eps-facility-integrated-pest-management-operations-plan-template> and the EPS Bed Bug Management Guide is available at: <http://vaww.hefp.va.gov/resources/eps-bed-bug-management-guide>. **NOTE:** *These are internal VA websites that are not available to the public.*

f. **Veterans Integrated Service Network Director.** The VISN Director is responsible for:

(1) Ensuring that all VA medical facilities within the VISN comply with this directive and informing leadership when barriers to compliance are identified.

(2) Coordinating with the Assistant Under Secretary for Health for Operations and VA medical facility Directors to ensure VA medical facility IPM programs address Veterans' safety and meet the requirements of Federal (e.g., EPA, OSHA), State and local regulations.

g. **VA Medical Facility Director.** The VA medical facility Director is responsible for:

(1) Ensuring overall VA medical facility compliance with this directive and taking appropriate corrective action if non-compliance is identified.

(2) Ensuring that the VA medical facility maintains an effective IPM program in order to protect the safety and health of Veterans, visitors and employees including

Community-Based Outpatient Clinics (CBOCs), Outpatient Centers and Health Care Centers (i.e., where pest management is not covered by VA medical facility leases).

(3) Ensuring that adequate resources are available to effectively implement an IPM program and IPMOP.

(4) Designating in writing a VA medical facility PMO to oversee all aspects of the IPMOP, including in-house and contract operations. **NOTE:** *The VA medical facility PMO is the chief of the service under which the VA medical facility IPM program falls.*

(5) Appointing a VA medical facility PMO and ensuring they have completed required pest management training. **NOTE:** *For additional information on training requirements, see paragraph 5.*

(6) Ensuring that VA medical facility Pest Management Professionals (PMPs) have received adequate funding and training to maintain their certifications and equipment.

(7) Coordinating with the Assistant Under Secretary for Health for Operations and VISN Director to ensure VA medical facility IPM programs address Veterans' safety and meet the requirements of Federal (e.g., EPA, OSHA), State and local regulations.

(8) Ensuring that the IPMOP is integrated into the VA medical facility Green Environmental Managements Systems (GEMS) program.

h. **VA Medical Facility Pest Management Officer.** **NOTE:** *The VA medical facility PMO is appointed by the VA medical facility Director and is the chief of the service under which the VA medical facility IPM program falls (e.g., Environmental Management Service (EMS), Facility Management, Engineering). The VA medical facility PMO is responsible for:*

(1) Developing and executing the IPMOP by utilizing licensed VA medical facility PMPs, contract services or a combination of both. **NOTE:** *The IPMOP template is available at: <http://vaww.hefp.va.gov/resources/eps-facility-integrated-pest-management-operations-plan-template>. This is an internal VA website that is not available to the public.*

(2) Ensuring the IPMOP is reviewed annually and governs all pest management activities. **NOTE:** *For additional information about IPMOP requirements, see paragraph 4.*

(3) Ensuring that pest management issues such as pest sightings are addressed within 48 hours, and that corrective action is provided to the reporting VA medical facility employee and documented in the IPMOP pest management log.

(4) Supervising personnel performing pest management activities at the VA medical facility, regardless of whether the activity is performed by a VA employee or contractor applicator.

(5) Ensuring that pest management activities performed outside of the VA medical facility PMO's service line area of responsibility (e.g., EMS, Facility Management, Engineering) comply with the IPMOP (e.g., grounds, maintenance staff using general-use pesticides) including all recordkeeping documentation.

(6) If the IPMOP uses contract services, providing oversight of the pest management contract and scope.

(7) Ensuring that VA medical facility PMPs are trained and certified in Public Health Pest Control and the other categories of pesticide applications that apply to their area of responsibilities as required by Federal (e.g., EPA, OSHA), State and local regulations. **NOTE:** *For additional information about training requirements, see paragraph 5.*

(8) Ensuring the safe use, management and application of pesticides by providing proper personal protective equipment (PPE) and the latest pest control equipment to the VA medical facility PMP.

(9) Ensuring VA medical facility PMPs are provided appropriate workspace for pest identification, housing of equipment and PPE and recordkeeping. **NOTE:** *The workspace must be habitable with proper ventilation and separate from pesticide storage.*

(10) Reviewing all pest management activity documentation and records at least quarterly and tracking trends to ensure content accuracy, appropriate follow up and resolution of pest management issues. This includes pest management activities outside the VA medical facility PMO's service (e.g., EMS, Facility Management, Engineering). This documentation and recordkeeping is provided by either the VA medical facility PMP or contracted pest management vendor.

(11) Providing prior approval on the application of all pesticides by VA medical facility PMPs or contractors in any patient care or restricted areas (i.e., Operating Rooms (ORs), Sterile Processing Services (SPS)) to ensure that local procedures are being followed. **NOTE:** *VA medical facility PMPs have the latitude and flexibility to perform specific applications or tasks. The VA medical facility PMO documents all areas of unique significance with VA medical facility PMPs at the beginning of the contract or the VA medical facility PMP start date.*

(12) Ensuring the proper management of bed bug activities that are not associated with direct patient care or contact (see the EPS Bed Bug Management Guide at <http://vaww.hefp.va.gov/resources/eps-bed-bug-management-guide>. **NOTE:** *This is an internal VA website that is not available to the public.*).

(13) Ensuring VA medical facility PMPs receive proper medical surveillance upon employment and annually thereafter.

(14) Ensuring the proper selection, placement and maintenance of light trap devices with assistance from the VA medical facility PMP.

(15) Incorporating sustainable IPM strategies and techniques into all aspects of pest management planning, training and operations, including in IPMOP and other written guidance (e.g., VA medical facility plans for environmental compliance, Green Environmental Management System, Respiratory Protection, Spill Response, PPE) to reduce pesticide risk and prevent pollution. **NOTE:** For more information about the IPMOP template, see <http://vaww.hefp.va.gov/resources/eps-facility-integrated-pest-management-operations-plan-template>. This is an internal VA website that is not available to the public.

i. **VA Medical Facility Pest Management Professional.** **NOTE:** The VA medical facility PMP is an individual who is licensed in one or more specialization categories established by the Federal (e.g., EPA, OSHA), State and local governments in which the VA medical facility PMP engages in the trade of pest control. The VA medical facility PMP is responsible for:

- (1) Recognizing common pests to be controlled and the damage caused by them.
- (2) Reading and understanding the label and labeling information on pesticides, including:
 - (a) The common name of pesticides applied.
 - (b) Pest(s) to be controlled.
 - (c) Timing and methods of application.
 - (d) Safety precautions and any specific disposal procedures.
- (3) Performing required pest management activities safely and according to the manufacturer's label (e.g., application, mixing, storage). **NOTE:** Specific pest management activities are determined by the VA medical facility depending on their organization structure and contract support.
- (4) Following local procedures when entering restricted areas of the medical facilities (i.e., ORs, SPS).
- (5) Recognizing local environmental conditions that must be considered during application (e.g., endangered species, protected waterways).
- (6) Reducing the potential for pesticide resistance by rotating pesticides, which involves alternating among pesticide classes with different modes of action to delay the onset of or mitigate existing pest resistance. **NOTE:** It is strongly recommended that non-chemical methods, such as sanitation or elimination of breeding areas, be explored prior to the consideration of chemical applications in accordance with IPM strategies.
- (7) Applying and handling restrictive-use pesticides. **NOTE:** VA medical facility PMPs are the only individuals permitted to handle and apply restrictive-use pesticides,

unless an employee is applying the restrictive-use pesticide under the direct supervision of the VA medical facility PMP.

(8) Maintaining proper pest management recordkeeping as outlined in the IPMOP and relevant State and local regulations.

(9) Assisting the VA medical facility PMO to ensure the proper selection, placement and maintenance of light trap devices.

(10) Providing pest management documentation and records to the VA medical facility PMO for review at least once every 6 months to ensure content accuracy, appropriate follow up and resolution of pest management issues.

3. PEST MANAGEMENT CONTRACT

The scope of work for IPM contract services must include but is not limited to:

a. Ensuring 24/7 coverage of the VA medical facility's pest management activities including CBOCs, Outpatient Centers and Health Care Centers (i.e., where pest management is not covered by VA medical facility leases).

b. Ensuring that the contract statement of work discloses the VHA ban on the use of the selective herbicide 2,4-Dichlorophenoxyacetic Acid (2,4-D).

c. Ensuring that contractor applicators are certified and properly licensed PMPs.

d. Maintaining required recordkeeping, including but not limited to inspection reports, pest sightings, pesticide application and follow-up activities.

e. Properly handling pesticides and not disposing of them on VA property.

f. Providing safety data sheets (SDS) on pesticides used at the VA medical facility.

g. Providing proof of insurance for any contractor conducting pest control services.

h. Ensuring that the VA medical facility PMO provides prior approval of all applications of pesticides in patient care and restricted areas (i.e., OR and SPS) to ensure all local procedures are followed.

4. INTEGRATED PEST MANAGEMENT OPERATIONS PLAN

a. The IPMOP must be one document and must conform to applicable Federal (e.g., EPA, OSHA), State and local regulatory requirements. A template of the IPMOP is available at: <http://vaww.hefp.va.gov/resources/eps-facility-integrated-pest-management-operations-plan-template>. **NOTE:** *This is an internal VA website that is not available to the public.*

b. An IPMOP is required at all VA medical facilities, regardless of whether the VA medical facility is serviced by a VA medical facility PMP, a pest management contract or

both. The IPMOP must comprehensively describe the VA medical facility's pest problems and actions required to provide an economical and effective control of such pests. **NOTE:** *The IPMOP must be reviewed annually by the VA medical facility PMO.*

c. The IPMOP governs all pest management activities and must address the following:

(1) Inspection frequency.

(2) Pest identification.

(3) Prevention measures.

(4) Selection of chemical and non-chemical options.

(5) Procedures for reporting pest sighting and follow-up activities.

(6) Staff and patient education.

(7) Bed bug management. For further information, see the EPS Bed Bug Management Guide available at: <http://vaww.hefp.va.gov/resources/eps-bed-bug-management-guide>. **NOTE:** *This is an internal VA website that is not available to the public.*

(8) Safe use, storage and management of pesticides, including:

(a) Ensuring that VA medical facility PMPs are provided appropriate PPE (consult pesticide label, SDS) and seek professional guidance from the safety office to determine appropriate PPE.

(b) Ensuring that SDSs are readily available for all pesticides used at the VA medical facility.

(c) Ensuring that all equipment used in pest control activities is marked "Contaminated with Pesticides."

(d) Ensuring that there is a current inventory of pesticides stored at the VA medical facility.

(e) Ensuring that the pesticide storage area is properly labeled on the entrance door, ventilated, provided adequate lighting and equipped with a spill kit.

(9) Recordkeeping.

(10) The ban on 2,4-D throughout VHA due to a perception by Veterans regarding the relationship between 2,4-D, Dioxin and Agent Orange.

(11) The prohibition against feeding wildlife on VHA property. Every effort should be made to inform patients, visitors and staff of this prohibition and potential hazards. An

exception can be granted by VA medical facility leadership for bird feeders, after an environmental pest management assessment is completed.

(12) Training requirements for individuals to safely and appropriately use general use pesticides.

5. TRAINING

The following training is **required**:

a. VA medical facility PMOs must either hold a valid and current Pest Management Professional/Applicator license or must complete the Talent Management System (TMS) Curriculum titled, "Pest Management Officer Training for Non-Licensed Pest Management Professionals" (VHA-198) upon assignment and every 2 years thereafter. The courses within this curriculum provide the foundational technical knowledge needed to effectively manage a VA medical facility IPM. The courses within the curriculum are:

(1) Introduction to Pest Management (VA-131005358).

(2) Bed Bug Basics and Beyond (VA-131005360).

(3) Pest Management in a Health Care Environment (VA-131005368).

b. VA medical facility PMPs must be trained and certified in Public Health Pest Control and the other categories of pesticide applications that apply to their area of responsibilities in accordance with Federal (e.g., EPA, OSHA), State and local regulations.

c. Any individual that applies general use pesticides must have documented general awareness training as outlined in each VA medical facility's IPMOP. The IPMOP must specifically address the training requirements for individuals to safely and appropriately use general-use pesticides.

6. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created by this directive must be managed as required by the National Archives and Records Administration (NARA) approved records schedules found in VHA Records Control Schedule 10-1. Questions regarding any aspect of records management should be addressed to the appropriate Records Officer.

7. DEFINITIONS

a. **Contractor Applicator**. For the purposes of this directive, a contractor applicator is a non-VA individual who is contracted to apply pesticides on VHA property. The contractor applicator is required to provide evidence of contractor applicator certifications in all appropriate pest management categories prior to beginning the contract.

b. **Direct Supervision.** For purposes of this directive, direct supervision is the act of being at the specific location where pesticide application is conducted, providing instruction and control and maintaining a line-of-sight view of the work performed. Certain circumstances may temporarily remove the line-of-sight view. Under these circumstances, the supervisor is responsible for the actions of the pesticide applicator.

c. **General-Use Pesticide.** General-use pesticides are pesticides which are legally purchased and applied by the general public without the need of any Federal (e.g., EPA, OSHA), State or local licensing requirements on the part of the user (e.g., wasp-freeze, Black Flag, Raid, Roundup) The IPMOP must address the training requirements for individuals to use general use pesticides safely and appropriately.

d. **Integrated Pest Management.** IPM is a sustainable approach to managing pests by cultural, mechanical, biological and chemical controls. Control mechanisms are selected in a way that minimizes economic, health and environmental risks. Where chemical control is indicated, specific pest populations are targeted for treatment when they are most vulnerable rather than a general application. Through the use of appropriate control measures and proper application, an implemented IPM program can result in a reduction in the use of pesticides that may adversely impact human health and the environment.

e. **Integrated Pest Management Operations Plan.** The IPMOP is a document specific to each VA medical facility that contains all the elements necessary to establish, administer and maintain a comprehensive IPM program with the goal to deliver safe economical controls that are effective in the control of pests. Each VA medical facility must have an IPMOP.

f. **Pest.** A pest is any insect, rodent, nematode, fungus or weed that can cause damage to humans, agriculture or other animals.

g. **Pest Control.** Pest control is the action of engaging in, recommending, advertising, soliciting the use of, supervising the use of or using a pesticide or device for the identification, control, eradication, mitigation, detection, inspection or prevention of a pest in, on or around a building, water area, air, plant, structure or animal.

h. **Pesticide.** Pesticide is any substance or mixture of substances, including biological control agents, that may prevent, destroy, repel or mitigate pests and is specifically labeled for use by EPA. Pesticide encompasses insecticides, herbicides, fungicides and rodenticides including any substance or mixture of substances used as a plant regulator, defoliant and desiccant.

i. **Restrictive-Use Pesticides.** Restrictive-use pesticides are pesticides that are legally purchased and applied only by licensed pest control applicators or applied under the direct supervision of trained and licensed applicators.

j. **Safety Data Sheet.** SDS is a document that lists information relating to occupational safety and health for the use of various substances and products.

8. REFERENCES

a. 38 U.S.C. § 7301(b).

b. EPS Bed Bug Management Guide, <http://vaww.hefp.va.gov/resources/eps-bed-bug-management-guide>. **NOTE:** *This is an internal VA website that is not available to the public.*

c. EPS Integrated Pest Management Operations Plan Template, <http://vaww.hefp.va.gov/resources/eps-facility-integrated-pest-management-operations-plan-template>. **NOTE:** *This is an internal VA website that is not available to the public.*