

Bed Bugs Issue Paper
Provided by the Tribal Pesticide Program Council

Background

In March 2015, the Tribal Pesticide Program Council (TPPC) held an in-person meeting in Washington, DC. It was during this meeting that tribal representatives engaged in an extensive discussion about bed bugs. The TPPC learned quickly that bed bugs are a common problem throughout Indian country and Alaska Native villages, but the means for addressing them varies across tribal communities. The TPPC committed, as a result of the discussion, to develop this bed bug issue paper for the U.S. Environmental Protection Agency (EPA) Office of Pesticide Programs. The issue paper provides a general overview about bed bugs; how bed bugs are finding their way into tribal communities; tribal research, education and outreach efforts as they pertain to bed bugs; bed bug treatment procedures including integrated pest management (IPM) practices and eradication efforts; barriers to implementing bed bug-related actions in tribal communities; a tribal-specific example involving treatment for bed bugs; and recommended actions for EPA.

Overview

The growing presence of bed bugs in Indian country and Alaska Native villages is placing an inordinate amount of societal, financial, public health, and other pressures on Indian tribes. The common bed bug (*Cimex lectularius*) feeds on blood, causes itchy bites, and generally irritates its human host. Bed bugs vary in size from the size of a sesame seed (nymph) to an apple seed (adult), and can lay up to 12 eggs a day and 500 eggs per bug. Bed bugs can go undetected, hiding in mattress seams and behind wood trim, until such time they find a human host on which to feed. EPA indicates that the recent increase in bed bugs in the U.S. is likely due to more travel by people, a lack of knowledge as how to prevent bed bug infestations, increased resistance of bed bugs to pesticides, and the ineffectiveness of pest control practices including the misuse of pesticides not intended for bed bugs. These are reasons with which tribal communities can identify as well.

Bed Bug Transmission into Tribal Communities

The TPPC is familiar with a number of means by which bed bugs have entered tribal communities in Indian country and Alaska Native villages. Tribal members are unknowingly bringing items into their homes that are susceptible to bed bug infestation such as used clothing and mattresses. Clothing donations, common in many tribal communities, has become a prominent transmission source for bed bugs. Pre-treatment of these clothes prior to entering tribal communities and learning how to inspect and recognize bed bug and their markings (blood stains and droppings) could help limit bed bug infestation opportunities in homes, but it comes at a cost that some communities may not be able or willing to pay. In fact, the TPPC has been made aware of some tribal leaders who are considering whether to stop accepting used clothes donations in their communities, although a real need for such clothing exists. Further,

used mattresses are susceptible to bed bugs and are finding their way into tribal homes through a variety of means including family members, friends, hotels, colleges, and mattress resellers. In addition, the TPPC has received reports from some tribal environmental departments that their staff has observed tribal members picking up discarded mattresses alongside the road for reuse in their homes. Whatever the source, used mattresses are being brought into tribal homes willingly with tribal members unaware that these mattresses may be infested with bed bugs.

Bed bugs are also finding their way into tribal homes through their employment occupations. A number of tribal members work in or near their communities in hotels, casinos, conference centers, elder/senior centers, schools, daycare centers, or other facilities through which a number of people circulate and who may be bringing bed bugs into these facilities. The tribal members who work in these facilities, particularly those involved in housekeeping roles, could be coming into contact with bed bugs unknowingly and bringing them into their own homes. For other tribal members, economic circumstances dictate that they travel many miles away from home to larger cities or other areas for gainful employment. The conditions under which they might be required to live could subject them to bed bugs. For example, the Bakken formation in North Dakota has experienced an oil boom in recent years and has attracted a number of tribal members from Indian country and Alaska Native villages for work opportunities in the oil fields. Unfortunately, in addition to bringing back much needed income to their families and communities, these tribal members, as some tribal environmental staff report, are returning with bed bugs whose original source are the multi-dwelling residences in which the members live while they are employed as oil field workers.

There are other reasons that tribal members are traveling outside their communities which are possibly exposing them to bed bugs. More and more tribal youth are attending colleges whose residence halls and rental housing are susceptible to bed bug infestations. Further, tribal members are traveling for vacation and work-related purposes, staying in hotels where bed bugs can be found, and often using airplanes in which their luggage shares space with other peoples' luggage that could have bed bugs. At least for work-related purposes, the TPPC is aware of some tribal environmental departments that are issuing travel tips for their employees regarding bed bugs with such tips including how to identify bed bugs and what to do if an employee suspects that he or she has been exposed to bed bugs.

Once in a tribal member's home, bed bugs will spread from room to room. This becomes particularly problematic for multi-family dwellings where the transmission of bed bugs is unconstrained by the walls separating housing units. As such, even if a tribal member takes the greatest precautions against an infestation of bed bugs, it may not be enough if his or her neighbors in the same dwelling aren't as cautious or if the housing entity managing the dwelling doesn't take the steps necessary to prevent or eliminate the presence of bed bugs.

Tribal Research, Education, and Outreach

The TPPC believes firmly that the most important activity in which Indian tribes can engage regarding bed bugs is research, education and outreach. Research, education, and outreach can be done proactively, by helping to prevent the entry of bed bugs into tribal communities, and also reactively, by helping to control and eradicate the bugs from such communities. Understanding the characteristics of bed bugs is critical in identifying and controlling bed bugs. A number of tribes have engaged in education and outreach regarding bed bugs using the limited financial and technical resources available to them. However, to do more education and outreach, and even research, these tribes and others require increased assistance from EPA and other federal agencies.

Many Indian tribes find gathering and outreach events, such as pow wows, health fairs, and Earth Day events, to be an effective means for conducting education and outreach, not only about bed bugs, but other environmental issues important to their communities. Gatherings are informal meetings where tribal members engage in a meal or other activity, and use it as an opportunity for the members to discuss a particular issue, environmental or otherwise. Outreach events are more formal during which pamphlets and other materials are handed out along with tools to address bed bugs such as hard plastic cards for lifting up baseboards to check for the presence of bed bugs, mattress encasements to protect against bed bugs, information on IPM measures to eradicate bed bugs, and diatomaceous earth for the treatment of bed bugs. Activities during these outreach events include presentations about preventing and eliminating bed bugs, specialized hands-on instruction for such activities as IPM, and coordination with other activities such as pesticide disposals. Some of these gatherings and outreach events have been supported financially by tribal communities, but the largest amount of financial support has come from EPA and other federal agencies like the U.S. Department of Housing and Urban Development (HUD). While federal agencies have provided direct funding for some of these activities, Tribal environmental staff has had to use EPA General Assistance Program (GAP) dollars more often. Few tribes can afford to use GAP funds for the ongoing education and outreach necessary for addressing bed bug issues, and those that do, are limited by what education and outreach that they can conduct. Yet, with limited funds, tribes have experienced successes. For example, the TPPC is aware of one tribal pesticide program which helped tribal community members to determine from where bed bugs in their homes were coming, to evaluate the extent of bed bug infestations in their homes, and to identify different means for remove the bed bugs absent the use of pesticides.

Tribal environmental departments are seeking additional ways to conduct education and outreach on bed bug issues, including training on working collaboratively with schools and housing entities within their communities, and states and other entities outside such communities. Other education and outreach efforts being considered include the development of public service announcements to be aired on tribal radio stations; the development of self-help kits that can be used in tribal homes to address bed bugs; and the development of hands-on training that requires tribal members to identify the presence of bed bugs. The latter two

options, in particular, require sufficient financial resources, not only for materials, but for staff dedicated to this effort.

The TPPC is aware of EPA's public website (<http://www2.epa.gov/bedbugs>) which, we understand, a number of tribes may be using to obtain necessary materials on bed bugs. The TPPC is grateful for this site, but does not find it sufficient to serve the entirety of Indian country and Alaska Native villages. A large swathe of Indian country and Alaska Native villages has poor or non-existent access to the internet, and where access does exist, most tribal members aren't going to use the website voluntarily to learn about bed bugs and how to eradicate them from tribal communities. The best means for communicating about the materials on the EPA website is through the gathering and outreach events described above, which, if sufficient financial resources to support them don't exist, will not happen. Absent such events, any materials printed from the EPA website will likely end up collecting dust on a shelf or finding their way to local dumpsters. Fortunately, personal engagement with tribal members can serve as comparable substitute if resources are made available to do so. For example, the TPPC is aware of at least one tribal housing entity that has required its maintenance department personnel to hand out bed bug information to tenants and engage in discussions with them about such information. Finally, some tribal communities require education and outreach materials in the first language of their tribes; unfortunately, such materials do not exist currently.

The TPPC was notified recently that EPA has committed \$100,000 toward Alaska Native villages to help identify the appropriate roles of various organizations and regulatory agencies with respect to bed bugs; identify the bed bug treatment, education, and outreach services needed in rural Alaska; provide communities in rural Alaska with effective tools and accurate information to address bed bugs when an infestation occurs; and use IPM principles in the approach to dealing with bed bugs. The TPPC appreciates EPA's assistance in supporting these types of education and outreach efforts in Alaska Native villages. We only hope that more of this assistance is forthcoming for other tribal communities if such communities are ever to be successful in eliminating bed bugs from their communities.

Bed Bug Treatment Procedures, IPM, and Eradication

The TPPC is aware of a number of bed bug treatment options available to Indian tribes with heat treatments, also a form of IPM, and pesticides appearing to be the most popular. The TPPC finds that neither treatment option will meet the needs of every Indian tribe and that there are limitations regarding the effectiveness of each option.

Using heat treatments to eliminate bed bugs from tribal homes appears to be reasonable on its face, but may not be practical for most Indian tribes and their members. Companies that perform heat treatments for bed bugs aren't typically in close proximity to most tribal communities, particularly those in Alaska where primary access to such communities is by airplane. Nevertheless, if a company could make heat treatments available to these tribal communities, the cost for providing the services would likely be cost-prohibitive

for tribes and their members after factoring in the cost associated with transporting large heating devices to these communities, and performing a sufficient number of heat treatments to ensure success as the total sum of treatments must cover the full lifecycle of a bed bug. Further, most if not all of these heat treatment devices require water and electricity, and in some tribal communities, running water and electricity in or near tribal homes is a rare commodity. Alternatively, tribal members could use what is available in their communities to perform heat treatments on their own. For example, a tribal member could use a dryer in his or her home to treat clothing and other materials to which bed bugs have attached themselves. However, there is no guarantee that every dryer commercially available can generate the heat necessary to kill bed bugs, and a dryer's use is limited to clothing materials and cannot be used in multi-functional ways throughout the home for heat treatment purposes. The TPPC is also aware of at least one tribe that has converted old oil heaters into a heating system useable for treating bed bugs. That is real ingenuity and shows what tribes can do with limited resources to implement an effective IPM measure, particularly those located in rural areas in the lower 48 states and Alaska. However, there are many more tribes in rural areas that would benefit from increased EPA funding for research and development that would help make available to them additional IPM measures to eliminate the bed bugs that have invaded their communities.

Pesticides provide tribes with another option for treating bed bugs. The TPPC understands that tribal members may be using pesticides with little to no effect on bed bugs, but are doing so because such pesticides are inexpensive and made readily available in their communities. Further, misuse of pesticides in tribal communities appears to be a problem as well, although a lot of misuse may be going unreported. If applied incorrectly, pesticides can have acute and chronic effects on people. Tribal environmental departments have reported to the TPPC that some people, in an attempt to remove bed bugs from their homes, are actually contaminating such homes and making the people inside sick. For example, some individuals are known to have applied pesticides to their mattresses, leaving residues that can cause headaches, nausea, vomiting, diarrhea, dizziness, muscle tremors, rashes and other reactions.

A tribal member informed the TPPC recently about her efforts to treat her home for a bed bug infestation. The tribal member had to wash every clothing-related item in the home at a cost of \$10.25 per load. This was compounded by the need to perform additional washing and cleaning throughout the home, and the installation of protective encasements around mattresses, couches, and other furniture in the home. In the end, the tribal member spent close to \$2,000 to remove and take preventive action against bed bugs in her home. Even so, there is no guarantee that she has successfully rid her home of bed bugs because, as the TPPC understands, the eggs of bed bugs have a dormancy period from three months to year. Tribal members can take this type of approach in treating their homes for bed bugs or they can use other options being used by other Indian tribes and tribal members such as diatomaceous earth (*e.g.*, insecticide earth), dry ice traps, fumigation, IPM, vacuuming, or a combination of these. The effects of some treatment options, such as IPM, may take longer to manifest than other options like pesticides. Waiting longer for such effects may be preferential to Indian tribes and their members in order to avoid the potential negative ramifications of using pesticides, such as placing an individual's health at risk. There is much to weigh for a tribal member in deciding on

which bed bug treatment option to pursue. EPA's guidance and assistance on such matters should be an essential part of this decision.

Implementation Barriers to Bed Bug-Related Actions in Tribal Communities

The TPPC is aware of several barriers preventing Indian tribes from effective implementation of bed bug-related actions in tribal communities, regardless of whether the action is focused on education and outreach, or actual steps to treat or prevent bed bug infestations.

The TPPC understands that, in many tribal communities, people with bed bugs in their homes aren't necessarily forthcoming with such information. These members appear to have a social stigma about letting others know that they might have bed bugs in their homes. However, this stigma isn't limited to tribal members. The people or entities that run hotels and others residential facilities in Indian country and Alaska Native villages, including multi-family dwellings, are also not willing to share such information either, not only because of the social stigma attached to bed bugs, but the cost to address the presence of bed bugs. Yet, this information must be shared if Indian tribes hope to remove and prevent further infestation of bed bugs in their communities because bed bugs don't care about a person's income status. As such, some tribal environmental departments are being proactive in learning about the existence of bed bugs in their communities by developing questionnaires for community members about bed bugs in their homes; and obtaining bed bug profiles for their communities to serve as a basis for requesting funding from EPA and other federal agencies regarding bed bugs. In both instances, the TPPC expects that the tribal environmental departments shall keep confidential the identity of tribal members providing the information.

Another implementation barrier is the location of Indian country and Alaska Native villages whose largely rural nature makes it difficult to get resources to such locations or to do so in a way that is not cost-prohibitive. Absent such resources, tribal members will either be forced to live with bed bugs that attack them nightly, or to use products within their communities that might be found on a shelf at a local store. However, there is no guarantee that such products will be effective, and if misapplied, could have adverse effects on tribal members or the local environment.

In addition, not every Indian tribe or its members has the financial resources to afford treatment that is both effective and safe. The TPPC has learned that tribal environmental departments, in some cases, are using limited GAP dollars to engage in education and outreach regarding bed bugs and the treatment of bed bugs. In fiscal year 2015, the federal budget for GAP was approximately \$65.5 million dollars, which, when apportioned equally among 566 federally-recognized tribes, is approximately \$115,000. GAP funds are intended to meet a critical need for tribes by providing them with funding to build capacity for environmental protection programs. Such capacity building could be stymied unnecessarily if tribes used substantially their GAP funds to engage in bed bug related activities; if EPA scrutinized such activities closely, it would also likely find them unallowable under GAP at the expense of more

important environmentally-based activities. Other tribal environmental departments, working in conjunction with tribal housing entities, have been able to secure Indian Housing Block Grant and Indian Community Development Block Grant funds to address bed bugs in housing units owned and managed by these entities. At least one tribal housing entity has indicated to the TPPC that it is sharing the cost with its tenants in treating bed bugs found in their housing units. The tribal housing entity pays half the cost and the tenant assumes the remaining cost. Absent these sources of funding, addressing bed bugs in Indian country and Alaska Native villages will be a continual uphill battle which tribes will never be able to win.

Tribal-Specific Bed Bug Treatment Example

The TPPC shares with EPA the following example of a tribe (Tribe) that had to incur a substantial cost, in 2014, to deal with a bed bug infestation in a lodging facility that it uses for conferences, workshops, family reunions, graduations, and youth events throughout the year. The lodging facility consists of a lodge, dining, hall, bunkhouse, restrooms, and a lakefront building, all which ended up being infested with bed bugs. The roof space of the lodging facility buildings is also home to six or more species of bats.

The Tribe was determined to address the bed bug infestation as soon as possible. However, the Tribe had to wait on treating for bed bugs until the bats migrated to another location. Thereafter, the Tribe considered a number of treatment options, some which are weather-dependent. For example, lodging facility staff set up bed bugs traps with dry ice, but such traps yielded no results in capturing any bed bugs. These traps were set up when temperatures were 30 to 40 degrees Fahrenheit. However, bed bugs become dormant in colder weather. As such, the Tribe plans to set up additional dry ice traps when temperatures reach at least 50 degrees Fahrenheit to see if this makes a difference in capturing bed bugs.

For the lodging facility's immediate bed bug treatment needs, a substantial cost had to be paid by the Tribe. The Tribe had to purchase materials for the cleanup of the lodging facility and its buildings. This included obtaining a waste dumpster at a rental rate of \$4 per day or \$111.75 per month; a one-time delivery fee of \$109.20 for the dumpster; a haul to transfer station fee of \$240.90; and a disposal fee of \$125 for dumpster materials. Other cleanup costs, in addition to lodging facility staff time, included personal protection equipment at \$500 for the staff; disposal and replacement of existing mattresses with mattress sets costing \$500 each; and over-the-counter pesticide control products. Thereafter, lodging facility staff removed and threw away carpets, furniture, and drop ceilings, and gave a thorough cleaning and vacuuming to each of the buildings of the facility. Windows, doors, and structural deficiencies were also repaired and/or replaced, as necessary, to minimize the effects of the bed bug infestation.

As the lodging facility and its buildings were being cleaned by staff, the Tribe procured bids for treating the facility and its buildings for bed bugs. A determination was made that three separate treatments were necessary in order to cover the lifecycle of the bed bugs, with treatments conducted every 7-11 days. The bid selected by the Tribe provided for the following costs: lodge at \$495; bunkhouse at \$250; dining hall at \$250; restrooms at \$125.00; and

lakefront building at \$250.00. The cost per treatment was \$1,370, and for three treatments, the total cost to the Tribe was \$4,110.

The Tribe is also being proactive about informing residents and staff about bed bugs. Actions include the posting of permanent signs inside each building with bed bug identification information; a laminated photo of bed bug information with rental agreements; the training of lodging facility staff to recognize bed bugs and conduct proper cleaning; and requiring lodging facility staff to complete weekly and monthly checklists on the condition of the buildings and any noticeable concerns including the presence of bed bugs.

The costs to the Tribe for treating the lodging facility and its buildings will likely wipe out any funds that would have been otherwise available to the programs held at the facility. Further, the likelihood of the lodging facility becoming infested again with bed bugs is high, particularly because the facility hosts events throughout the year. At some point, based on limited funding, the Tribe may have to decide whether to expend its annual budget toward cleanup costs to control bed bugs, tear down the lodging facility or some of its buildings, or do nothing. None of these options are ideal and will have great ramifications to the Tribe.

Recommended Actions for EPA

Prioritization. The TPPC understands that EPA and other federal agencies feel they have made bed bugs a priority issue as evidenced by the “Collaborative Strategy on Bed Bugs,” a document issued in February 2015 by the Federal Bed Bug Workgroup.¹ However, this strategy document fails to include Indian tribes, causing the TPPC to believe that the federal agencies involved in drafting this document, including EPA, have little to any understanding about the growing bed bug problem facing tribes nationwide and the need to address this problem swiftly. As such, the TPPC recommends that EPA make bed bugs a priority issue for Indian country and Alaska Native villages, and should start doing so by making them a priority in the next National Program Manager Guidance issued by EPA. Further, EPA should maximize its opportunities to share information about bed bugs at conferences, workshops, and other events at which tribal representatives will be present.

Collaboration. The TPPC recommends that EPA collaborate with other federal agencies and entities regarding bed bug issues in Indian country and Alaska Native villages. EPA has only so many resources available to it and must collaborate with other federal agencies and entities if it is ever able to provide the financial and technical resources necessary that tribes require in effectively addressing bed bugs. A collaborative effort on bed bug issues between EPA, Indian Health Services, and HUD is a good start, but EPA must make every effort to recruit other relevant entities. This effort should be memorialized by a multiagency bed bug workgroup requiring the inclusion of tribal representatives living in communities that have been exposed to

¹The Collaborative Strategy on Bed Bugs was authored by EPA, Health and Human Services [CDC], HUD, and the U.S. Department of Agriculture, and includes technical information and input from the Department of Defense and the National Institutes of Health.

bed bugs (*e.g.*, beyond the current EPA bed bug workgroup that doesn't include tribal representatives). Such representatives would be able to bring a unique perspective to this workgroup since they are able to speak firsthand about bed bugs in their communities and what actions they have and haven't been able to take to address the presence of these bugs. For example, the bed bug workgroup, in collaboration with the tribal representatives, could identify ways to address bed bugs located in rural tribal communities, and seek out the financial and technical resources to do so. One such effort, in collaboration with HUD, could be the development of best management practices (BMPs) for laundromats. A number of tribal members, not having washers and dryers in their homes, are forced to use laundromats to wash and dry their clothes. Taking into account the number of people and clothes circulating through these laundromats, the BMPs could help reduce the transmission of bed bugs from the laundromats to tribal homes.

The TPPC also recommends that EPA set up a series of meetings with other federal agencies, in collaboration with Indian tribes, to engage in such activities as identifying tribal funding needs for addressing bed bugs in their communities; and defining the roles and responsibilities of federal agencies for addressing bed bugs in Indian country and Alaska Native villages.

Funding. Collaboration is very important, but funding made available to Indian tribes to address bed bugs in tribal communities is vital. Indian tribes are not in a financial position to add bed bugs to the many environmental issues with which they must already contend. Tribes require dedicated federal funding from EPA to address the growing bed bug problem facing Indian country and Alaska Native villages. This necessitates not only that EPA provide tribes with specific information about what federal funds are available to them to address bed bugs within their respective communities, but that EPA also collaborate with tribes, as part of meetings or webinars, to discuss ways to secure additional funding for tribes.

Any federal funding made available to Indian tribes must also not be plagued by restrictions that limit the types of activities in which tribes can engage. Tribes are best able to determine the needs and concerns of their communities. As such, the types and depth of activities for which EPA funding can be used should be expansive. Tribes should be able to use such funding to address bed bugs on their terms which may include investing in research, education, and outreach materials, conducting bed bugs workshops within their communities, purchasing bed bug treatment resources, hiring staff dedicated to addressing bed bugs issues, or a combination of these activities. Further, the TPPC recommends strongly that EPA streamline its grant funding process by accelerating the turnaround time between grant solicitation and grant awards in order to get funding more quickly to the tribes that require it to address the bed bug problems plaguing their communities. Finally, EPA should work closely with the recipients of grant awards to help remove or streamline any federal barriers that could delay implementation of tribal actions to address bed bugs in their communities.

Finally, EPA should leverage the funds of other federal agencies (*e.g.*, like funding for HUD's Healthy Home Initiative) to establish a circuit rider program that would require circuit

riders to travel throughout Indian country and Alaska Native villages to address bed bug issues based on the needs and concerns of the communities.

Technical Resources. EPA and other federal agencies should establish and make available to Indian tribes the types of technical resources that they require for addressing bed bug issues within their communities.

- First, EPA should provide tribes with a list of recommended treatments for bed bugs and corresponding information on treatment specifics such as costs, portability to rural communities, and advantages and disadvantages of treatments.
- Second, EPA should provide tribes with the resources, funding and otherwise, to access and use those bed bug treatments most beneficial and applicable to their communities' circumstances. For example, tribal communities located in rural areas, such as those in Alaska, have informed the TPPC that they need hands-on training regarding bed bugs, but that the materials for this training must be sustainable, light, and small since they would need to be transported on airplanes.
- Third, EPA should develop a model bed bug IPM plan for tribes to use within their own communities. Such a plan would include a control matrix of essentials (*e.g.*, air, food, and shelter) and a bed bug monitoring scheme. A tribe would adapt the plan to the needs of its community (general or specific to buildings such as casinos, hotels, or schools), acquire from EPA scientific studies about the type of bed bugs located in the community, monitor the activities of the bed bugs, and determine the essential(s) to take away from the bed bugs to maximize their eradication. And, of course, tribes would require and technical assistance funding support from EPA to adapt the model bed bug IPM plan to their own communities and to enable such tribes to hire IPM staff to put the plan into action.
- Fourth, EPA should collaborate with other federal agencies to develop holistic policies and plans for tribal communities to prevent and eliminate bed bugs from such communities. As one example, EPA should work closely with HUD to develop a policy template that could be used by tribal housing programs and tribally designated housing entities to address such bed bug issues as how to prevent bed bugs, how to identify bed bugs, what a tenant should do if he or she suspects a bed bug infestation, the type of bed bug treatment options that can be used, and precautions to be taken regarding bed bug treatments.
- Fifth, EPA should collaborate with tribal communities regarding the actions that they have taken to successfully prevent or eliminate bed bugs from their communities and reference these actions in developing models for action by other tribal communities.
- Sixth, EPA should work closely with tribes to secure the services of Native American individuals to deliver to tribal communities the technical resources they require, including education and outreach materials, to address bed bugs within their communities. The TPPC finds that tribal communities will likely be more receptive to these Native American individuals and the technical resources that they have to offer as compared to

non-Native American individuals with little if any connection to tribal communities or cultures.

Conclusion

The TPPC is pleased to provide this bed bug issue paper to EPA. The issues discussed in the paper are based on the input of tribal representatives at the March 2015 in-person meeting identified above, a joint March 2015 conference call involving EPA staff and tribal representatives, a May 2015 conference call involving tribal representatives only, and one-on-one discussions between TPPC members.