Model Policy Statement for Integrated Pest Management in Schools and Child Care Facilities

School Pest Management Policy Statement

Structural and landscape pests can pose significant problems in the urban environment. The pesticides used to remediate such pests can also pose health risks to people, non-target organisms, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of this school district/child care facility (district/facility) to use Integrated Pest Management (IPM) procedures for the control of structural and landscape pests. Through the use of IPM, this district/facility will minimize pesticide use and maximize pest control, thereby reducing the exposure of children, parents, and staff to both.

To accomplish this goal, managers will utilize physical, mechanical, cultural, biological, and educational tactics as primary controls. Reduced-risk chemical controls will be used when necessary. Pests will be controlled to maintain the integrity of school buildings and grounds, to protect the health and safety of children and staff, and to maintain a productive learning environment. Pesticides will not be used to control pests for aesthetic reasons alone. Contractors working in district buildings and grounds are required to adhere to all provisions of this policy.

The United State Environmental Protection Agency (USEPA) and the National Parent Teacher Association encourage Integrated Pest Management in schools.

Pest Management

Pests are populations of living organisms (animals, plants, or microorganisms) that interfere with use of the facility by students and staff. Strategies for managing pest populations will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

<u>IPM Coordinator</u>

1. The district shall appoint an IPM Coordinator who shall have primary responsibility for ensuring that this IPM policy is carried out. The IPM Coordinator will oversee custodial, building and grounds, and maintenance staff to ensure implementation of pest prevention measures; manage pest control contractors and staff engaged in monitoring and control of pest problems; communicate with principals and district administration to carry out posting and notification, recordkeeping, and education provisions in this policy; provide IPM information to the school

community (including parents) and answer questions on IPM topics; present an annual report to the facilities management evaluating the progress of the IPM program.

Many school districts designate their facilities manager as the IPM Coordinator.

Integrated Pest Management Procedures

IPM procedures will determine when to control pests and whether to use mechanical, physical, chemical, cultural, or biological means. IPM practitioners depend on current, comprehensive information on the pest and its environment and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage with least possible hazard to people, property, and the environment.

Cost or staffing considerations alone will not be adequate justification for use of chemical control agents, and selected non-chemical pest management methods will be implemented whenever possible to provide the desired control. It is the policy of this facility to utilize IPM principles to manage pest populations adequately. The full range of alternatives, including no action, will be considered.

When it is determined that a pesticide must be used in order to meet important management goals, the least hazardous* material will be chosen. The application of pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code 136 et seq.), School District/Childcare Facility policies and procedures, Environmental Protection Agency regulations in 40 Code of Federal Regulations, Occupational Safety and Health Administration regulations, and state and local regulations.

THIS DISTRICT/FACILITY RECOGNIZES AND ADHERES TO THE FOLLOWING PROCEDURES:

1. Integrated Pest Management programs are designed prevent pest problems whenever possible. This is done through monitoring, regular inspections, high standards of sanitation and pest proofing measures, or modification of environmental conditions leading to pest problems.
2. The district/facility will establish pest tolerance thresholds for common pests. These thresholds will serve as an indicator for pest population levels and the point at which control measures will be undertaken. Control measures will not be undertaken if pest damage or populations are below threshold levels. In such cases, managers will use preventive measures such as improved sanitation, clutter reduction and exclusion of pests. When determining threshold values, keep in mind that they will vary for each organism (e.g., the threshold may be higher for crickets than for venomous insects). Thresholds will not be set based on aesthetic criteria alone.
3. When pests do exceed tolerance thresholds, non-chemical pest control measures (e.g., sanitation, screening, physical barriers, vacuuming, mulching, irrigation, fertilization, manual weeding, insect nest removal, pest-resistant plant selection) will be practiced.
4. Pesticides will be used when appropriate, along with other management practices or when other pest prevention and non-chemical control measures have failed to reduce pests below tolerance thresholds. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents. When a pesticide must be used, the smallest amount of the reduced-risk product that will meet pest management goals will be used.

5. **No routinely-scheduled (e.g., seasonal, monthly or weekly) pesticide applications will be made. No pesticide fogging or space spraying will be conducted inside or outside.** Insecticides will be used only in containerized baits, or for spot treatments targeted to insect infestations or problem areas where a minimal amount of material is used. Rodent baits shall not be used unless in childproof bait boxes. Bait boxes shall be inaccessible to children and tethered when appropriate.
6. Pesticide Use and Selection. To ensure the safety of students and staff, the management will use the following criteria to ensure that the least hazardous pesticide and/or the least hazardous method of control be utilized:
    a. No use of any pesticide classified as highly acutely toxic by the U.S. EPA. This includes Hazard Category I and II, signal words DANGER and WARNING.
    b. The district/facility shall not use any pesticide unless all ingredients in the product have been evaluated by the U.S. EPA and found to include no possible, probable, known, or likely human carcinogens; no reproductive toxicants; no known, probable or suspected endocrine disruptors; and no nervous system toxicants (either cholinesterase inhibitors or listed as neurotoxins by the Toxics Release Inventory.) A pesticide will not be used if the facility does not have information on its ingredients, including inert ingredients.
    c. All ingredients in pesticides used by the facility shall have a soil half-life of 30 days or less.
    d. Properly applied gel bait or tamper-resistant containerized bait can be exempted from 6a, 6b, and 6c if it represents the least hazardous treatment option.
7. Pesticide Applications. The Facilities Management Office must approve pesticide applications in advance; antimicrobial agents and insecticide and rodenticide baits, because they pose less risk to human health, are exempt from approval. Pesticides will be applied by certified pesticide applicators only when no one is present in the building or the grounds of the school to be treated. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), US EPA regulations, Occupational Safety and Health Administration regulations, and state and local regulations.

The reference to the various statutes that apply to pesticide application is simply stating that it is the policy of the school district/child care facility that all <u>current</u> laws regarding pesticide application will be obeyed.

Education

Staff, students, pest managers, and the public will be educated about potential school pest problems and the IPM policies and procedures to be used to achieve the desired pest management objectives.

1. Parents will be informed annually about the IPM policy;
2. Staff will receive information and/or training on their role in pest management.

Cooperation from all members of the community is important to the success of an IPM program. For example, educating teachers and students about appropriate storage and disposal of food can significantly reduce pest problems in lockers, classrooms or teachers' lounges. Providing parents with

information on appropriate treatment of head lice can help avoid inappropriate and ineffective pesticide use in classrooms and homes.

Record Keeping

Records of pesticide use shall be maintained on site to meet the requirements of the state regulatory agency and Facilities Management policy. Records must be current and accurate. These records shall be made available upon request to school staff and the general public during normal operating hours, and shall be kept for at least three years.

Facility Management will keep records of the following:

1. Current list of pesticides used, pesticide Material Safety Data Sheets (MSDSs), pesticide product labels, and available manufacturer information about inert ingredients;
2. Records of all pest control actions (location, purpose, and complete information on the pesticide as indicated in 1);
3. Information on the number of pests or other indicators of pest activity that can verify the need for action.

The objective is to create records from which programs and practices can be evaluated in order to improve the system and eliminate ineffective and unnecessary treatments. The form can be fairly simple.

Notification

This Facility takes the responsibility to notify the school staff, students, and parents of upcoming pesticide treatments. Antimicrobial agents, such as sanitizers and insecticide and rodenticide baits, are exempt from notification requirements. Notification will occur in accordance with local/state laws. Exemptions from prior notification shall include emergency situations and applications of bait pesticides and/or container-delivery systems.

Facility Management will see to the following:

1. All parents and staff will be notified of a pesticide application **at least three business days** prior to any pesticide applications in buildings or on grounds, with the exception of exempt applications. Parents should be notified each time a non-exempt pesticide is applied. Neighbors immediately adjacent to the school property will be notified at least two business days in advance of outdoor pesticide applications.
2. Applications exempt from prior notification are: antimicrobial agents, insecticide and rodenticide baits; container-delivery systems; emergency situations.
3. In situations where pesticides must be applied on an emergency basis and are not an antimicrobial agent, insecticide or rodenticide bait, or a container-delivery system, notification to parents and school staff will occur within two business days following the application.

4. Contractors: The management will provide written notification to all current pest control, construction and landscape contractors of the need to adhere to the IPM policy in any pest control, planning, new construction, repair or maintenance work done. Any pest control contractors hired will be required to inspect for conditions conducive to pest problems and develop appropriate prevention measures, not simply apply control materials. Pest control contractors will be expected to provide recommendations for structural improvements or repairs, and housekeeping and sanitation measures required to reduce or prevent recurrence of pest problems.
5. Posting: Signs will be posted on facility doors and near site of planned applications at least three business days in advance of pesticide use, and at the time of application. These signs will include the name of the pesticide used; date and time of application; warning or cautionary statements from product label (including restrictions on entering the treated areas or special cautions for certain individuals); information about availability of product labels, MSDS and inert ingredients lists at the facility office; and a contact phone number for those seeking additional information. Outdoor applications will be cordoned off and flagged. Signs shall remain in place for one week after pesticide application, or a longer period of time if specified by the pesticide label.

If your district relies on a contractor for pest control services, it is important to communicate to the company the IPM policy. Including IPM requirements in Pest Control bid specifications can help ensure compliance with the IPM policy. Model IPM bid specifications are available in the toolbox.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use during the year. Pesticides will be stored and disposed of in accordance with the EPA-registered label directions and state regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel.

Pesticide Applicators

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by this district/facility. Applicators must follow regulations and label precautions. Applicators should be certified and comply with this IPM policy and any existing Pest Management Plan.

**Precautionary statements are required on all pesticide labels. Signal words indicate the level of acute toxicity (the hazard to humans posed by the pesticide product). Every label bears the child hazard warning: Keep Out of Reach of Children.*

Note: Throughout this document are notes, in italics, that provide further information regarding the policy recommendations. The model policy itself consists only of the text in regular type. This model policy is based on sample policies developed by US EPA, Illinois Department of Public Health (IDPH), Vermont PIRG,Washington Toxics Coalition, and Texas AgriLife Extension.