What do you know about using pesticides in your school district?

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In 1991, the Texas Legislature passed a law requiring all public schools to adopt an integrated pest management (IPM) program to protect students from random unauthorized use of pesticides. This law was also designed to move away from prescriptive routine-based sprayings to a more targeted approach to pest management by monitoring and inspecting to ascertain the type of pest and the best way to manage that pest. These rules modified when the Texas Department of Agriculture (TDA) in 2007 took over oversight of this program for the 1,026 independent school districts on maintaining an IPM program. These rules encompass having an appointed employee who is the designated IPM coordinator, who must receive 6 hours of specialized training within six months of being appointed by the District Superintendent and then receive 6 additional continuing education credits every three years. At the same time the IPM Coordinator is responsible for maintaining the Board Adopted IPM Policy, educating staff about the IPM program, monitoring for pest problems, keeping track of all pesticide applications made on District property by staff, contractors, and volunteers (school gardens) daily and keep an eye on all the District buildings to ensure they remain pest free. TDA is required by the Legislative Budget Board to inspect 20% of Texas schools each year for their compliance with these regulations. As an instructor in the Ag Science program you may be asked to help with the district IPM program, if you haven't been asked to serve as IPM Coordinator, here are a few things you should know.

The use of pesticides in Texas school districts is regulated by the Texas Department of Agriculture. Not every situation that arises on school district property regarding the use of pesticides is addressed by the laws and regulations. In these instances, a good understanding of the situation and proper application of common sense should prevail. School Board approved pesticide policies and good communications at school districts are essential to protect students, staff members, volunteers and visitors from pesticide misapplications, or human exposure issues involving the judicious use of pesticides. Pesticide applications at school districts made by unlicensed applicators increase the possibility of a misapplication. Therefore, this article is to help everyone understand their roles in the School IPM program and how pesticide applications on school district property to include applications made to produce agriculture commodities from raising livestock projects to garden projects can be done.

School buildings, classrooms, and grounds (including sports fields) fall under the jurisdiction of the <u>Occupations Code, Chapter 1951</u>. This includes Ag Science classrooms and shops. School buildings and classrooms that are clean and well maintained will have fewer pest problems. All pesticide applications to these areas must be performed by a licensed pesticide applicator with the proper category of license. Under the Occupations Code a school district can have a district employee as a noncommercial applicator licensed in pest, termite, lawn & ornamental or weed categories to conduct the daily pest management operations. Under Chapter 76 of the Agriculture Code, school districts can also have a noncommercial applicator that is licensed in the 3A Landscape Maintenance category. Under this license, TDA allows for unlicensed persons to work under the 3A licensee provided annual training is provided.

Those applicators with the Agriculture 3A Landscape Maintenance category can make applications on sports fields and grounds for pests and diseases of turf and ornamentals, but not in and around structures to prevent pest from entering or outdoors to control pests of people such as mosquitos, fleas, or ticks. This is based on an exemption in the Occupations Code that allows a person who performs pest control work on growing plants, trees, shrubs, grass, or other horticultural plants to hold an applicator license issued under Chapter 76 of the Agriculture Code, that covers the pest control work being performed. All pesticide use must be coordinated with the school district's IPM Coordinator. Therefore, if you are licensed and making an application on school property, it is your responsibility to make sure the IPM coordinator has copies of your pesticide application use records. It would also be wise to make sure that individual has copies of any insecticides/herbicides labels you might use, as well as the safety data sheets.

As for the use of pesticides at school agricultural facilities used for the production of agriculture commodities such as livestock, poultry, and crops fall under the <u>Agriculture Code</u>. This includes the use of misting systems in livestock barns; pesticide applications in greenhouses; pesticides used on livestock, poultry and crops; rodenticides used on agriculture facilities; and herbicide applications involved in producing agriculture commodities, including applications made by community volunteers for garden projects. Any use of Restricted Use or State Limited Use pesticides requires a pesticide applicator license with the proper category under the Agriculture Code Section Chapter 76. Private Applicator Licenses are only applicable in the production of an agricultural crop. In short, what this rule means that if you have a pest of animal or plant in your classroom setting then you can take care of the problem as part of the demonstration of teaching proper care and maintenance. However, if there is a pest that would be a pest in your instructional classroom or your home, then call the IPM coordinator to get help.

As teachers you should not have to be responsible for taking care of rodents, cockroaches, ants, and birds without the help and support of the IPM program. When I inspect schools for their IPM programs the Ag Science program is always addressed with trepidation because no one understands their roles. This article is the first step in helping schools in Texas understand the integrated pest management program placed into law over twenty years ago was designed to help schools not hurt them. We are all busy, but with good communication and designated roles you can have a reasonable pest free environment. For more information about the Texas School IPM rules you can visit the TDA website at School District Responsibilities for Pest Control in the School Environment or the Texas A&M AgriLife Extension School IPM website to learn more on how you can help.