

## **Model School IPM Policy Statement**

Schools need a clear policy statement to secure agreement about how pest control will be performed. The policy statement should include pest management objectives and goals; a set of roles and responsibilities for occupants, pest management personnel, and key decision makers; and a set of pest management guidelines.

The following is sample language that can be included in a school IPM policy. The policy is based on IPM and does not ban pesticide use. IPM does not exclude the use of pesticides, but it does encourage minimizing their use. You may use this language as it appears here or adapt it to your own situation.

**Note:** *After each section, we have included explanatory comments in italics.*

### **Introductory Statement**

Structural and landscape pests can pose significant problems to people, property, and the environment; however, the pesticides used to solve these problems carry their own risks. It is therefore the policy of this School District to adopt Integrated Pest Management (IPM) procedures for the control of structural and landscape pests. It is the goal of this District to provide safe, effective, and economically feasible pest control while protecting students, staff, the environment, and District property.

*Comments: This paragraph acknowledges that both pests and pesticides pose hazards to people, property, and the environment and states the intention of the district to adopt IPM. It also notes that pest controls should be economically feasible.*

### **Integrated Pest Management Objectives**

Pest control using IPM requires an understanding of the pest's life cycle and habits. IPM uses this information, combined with regular monitoring, to determine if, when, and how to intervene for optimum pest control. IPM uses a number of different strategies, not just pesticides, to control a pest. The goal of IPM is long-term pest control; therefore, emphasis is placed on preventing pests and on making the school environment inhospitable to them.

IPM procedures will determine when to control pests, and whether to use sanitation, or physical, horticultural, or biological means. Chemical controls are used only after all other alternatives are considered and found to be inadequate or not feasible to prevent unacceptable levels of pest activity and damage. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents. The full range of alternatives, including no action, will be considered.

IPM Goals include the following:

- reduce any potential human health hazard or protect against a significant threat to public safety
- prevent loss or damage to school resources, structures, or property
- prevent the spread of pests to the community, or to plant and animal populations beyond the school site
- enhance the quality of life for students, staff, and others

*Comments: This section defines IPM and lists specific reasons for managing pests.*

When it is determined that a pesticide must be used, the least-hazardous (see information on pesticide labeling at the end of this statement) material will be chosen. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), U.S. Environmental

Protection Agency regulations in 40 CFR, the California Food and Agriculture Code, the California Code of Regulations, Occupational Safety and Health Administration regulations, and School District policies and procedures,.

*Comments: This paragraph states that pesticides will be applied according to the laws governing pesticide use.*

### **Pesticide Applicators**

If pesticide applications are necessary, persons who apply pesticides to school grounds or property will be licensed or certified by the California Department of Pesticide Regulation (DPR) or by the California Structural Pest Control Board (SPCB) and will comply with this School District IPM Policy and any IPM Plans. Applicators must be trained in the principles and practices of IPM and the use of pesticides approved by this School District, and they must follow regulations and label precautions. Unauthorized persons are prohibited from bringing and/or applying pesticides to school property.

*Comments: This paragraph upgrades the level of competence for pesticide applicators working for school districts, since licensing is not required by state law. Currently, all those who apply pesticides to school property as a condition of their employment or as incidental to their job must be trained in the proper use and handling of pesticides, and documentation of this training must be maintained at the District. These personnel are, however, exempt from any licensing requirements.*

### **Monitoring**

District personnel or their agents will periodically inspect buildings and grounds to inventory conditions that could lead to pest problems. District personnel or their agents will also monitor key pest populations to determine if, and when, they should be treated. Records of inspection activities will be used to determine optimum times to control pests. Monitoring will continue after treatment in order to evaluate effectiveness.

*Comments: Monitoring is the keystone of IPM and should be an integral part of pest management procedures.*

### **Record Keeping**

Written records will be kept on the number of pests or other indicators of pest populations both before and after any treatments. Records will document not only pesticide use, but also any non-chemical treatment methods. Records must be current and accurate if IPM is to work. Records of pesticide use will be maintained on site to meet the requirements of state and local regulations. The objective is to create records from which programs and practices can be evaluated in order to improve the system and to eliminate ineffective and unnecessary treatments.

*Comments: Written records serve as the memory of an IPM program; thus, it is very important to document every kind of pest control treatment. The Healthy Schools Act of 2000 requires pesticide use records to be kept on site for four years. There is no need to mention this in the policy unless the district decides to require a longer period.*

### **Notification and Posting**

Notification and posting of pesticide applications will follow the requirements of AB 2260, the Healthy Schools Act of 2000.

*Comments: Currently, AB 2260 specifies certain notification and posting requirements (see text of AB 2260). Notification and posting requirements need not be spelled out in an IPM policy unless the District decides to implement requirements that are more rigorous.*

## **Education**

Students, staff, administrative personnel, 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. Thorough IPM training will be made available to staff directly involved in pest management, food service, and in the maintenance of buildings and grounds.

*Comments: Training must be included in an IPM program so that staff and students understand the changes that will be taking place, and so that personnel that must deal directly with pest management can easily secure information, tools, and techniques that will help them make the transition to IPM.*

## **IPM Coordinator**

The District will identify or designate a person to serve as the IPM Coordinator who will be responsible for implementing this IPM policy and any IPM Plans. The Coordinator's principle responsibilities will include the following:

- Serving as the primary contact for pest control matters
- Fulfilling the requirements of AB 2260, The Healthy Schools Act of 2000 (Education Code sections 17610-17612)
- Overseeing district staff or contractors responsible for pest management
- Coordinating pest management decisions for the district
- Devising and overseeing a monitoring program
- Keeping written records of monitoring data and pest sightings by staff and students
- Identifying key pests and key management sites and devising IPM plans for these pests or sites
- Evaluating the effectiveness of any treatments, either non-chemical or chemical, used for pest control
- Evaluating the progress of the IPM program
- Scheduling and facilitating Pest Management Advisory Committee meetings

*Comments: AB 2260 requires school districts to designate a person to carry out the provisions of the bill. If the district chooses to adopt IPM, this person may be called the IPM Coordinator. An IPM program will work more smoothly if someone has the job of coordinating its various elements.*

## **Transition Time**

This District recognizes that the implementation of this policy will require a period of transition to new pest management strategies. The District will work to implement this policy in a way that ensures that personnel involved in pest management have the time, technological assistance, and support to make the transition.

*Comments: It is important for the people who must directly implement IPM policy to feel that they have support from the district during the sometimes difficult transition phase.*

## **Pesticide Purchase, Storage, and Disposal**

Pesticide purchases will be limited to the amount authorized for use during the year. Unwanted pesticides must be disposed of at a Hazardous Waste Collection Facility and should never be placed in the trash or poured down any type of indoor or outdoor drain. Pesticides must be stored in a dark, cool, dry, and secure site not accessible to students or unauthorized personnel. A cabinet in a non-student area with a locked and labeled door is advised. The door label should include a visual signal, such as skull-and-crossbones for non-English reading adults or children.

*Comments: These directions are more specific than many pesticide label directions for both storage and disposal. Pesticide containers may be disposed of in regular trash, but only when empty and triple rinsed.*

### **Pest Management Advisory Committee**

The District will select a committee to advise the District on pest management issues.

*Comments: This committee can be very useful in making suggestions, doing research, and bringing in new information, but it should not have authority to make policy. It is vital that the committee have as members an independent pest management expert (preferably one trained in IPM), the district IPM Coordinator, representatives from the school administration, from the maintenance and operations department, and from the community. Ideally, the committee would also include someone trained in toxicology and someone knowledgeable about the laws and regulations governing pesticides. Having a teacher and a principal from the district can also be helpful.*

### **Pesticide Lists, Approved or Banned**

*Comments: These lists can present many problems in implementing an IPM program, especially if they are crafted with little knowledge of pesticides and pest management. Approved lists need to be updated constantly because new products and active ingredients come to the market every few months and old products frequently change their names or formulations, or they disappear. Banned lists can inadvertently remove products or active ingredients that are widely accepted IPM tools when broad categories of chemicals are banned.. It is important to remember that the dose makes the poison and that there must be exposure to the material for it to cause problems.. Banning chemicals before substitutes or alternatives have been identified can make the transition to IPM very rocky and filled with antagonism and ill will. The perceived lack of tools can lead to obstruction from personnel who work most closely with pest management and can add unnecessary stress to the system. Many IPM programs function very well without banned or approved lists, but if a list is required, an approved list will cause fewer problems. Make sure to list “antimicrobial pesticides including sanitizers and disinfectants” on the approved list and include a clause about emergency exemptions. Tying the district to a fixed percentage reduction in pesticide use can also hamper the progress of an IPM program. When IPM is properly implemented, pesticide use will be minimized.*

### **Pesticide Labeling Information**

Law requires that precautionary statements and signal words be included on all pesticide labels. Always read pesticide labels thoroughly. Use all pesticides according to label directions. Misuse of any pesticide

is not only illegal, but may create a potentially dangerous situation. The signal words (see below) indicate the level of acute (immediate) toxicity of the pesticide to humans when taken orally. The chronic (long-term) toxicity is not indicated on the label. Note that chronic toxicity may be important for materials used frequently or extensively, or used in areas where children may receive regular whole-body exposure (for example, lawns on which young children play, sit, and lie). Chronic toxicity information can be obtained from several reputable sources, such as U.S.-EPA (available at <http://www.epa.gov/iriswebp/iris/index.html>) or the National Pesticide Telecommunication Network (1-800-858-7378). Every pesticide label bears the warning “Keep Out of Reach of Children.”

### **Signal Words**

If none of these warnings is provided, do not use the pesticide.

**DANGER:** The category of highest toxicity. A taste to a teaspoonful taken by mouth could kill an average-sized adult.

**WARNING:** The category of moderate toxicity. A teaspoonful to an ounce taken by mouth could kill an average-sized adult.

**CAUTION:** The category of least toxicity. An ounce to over a pint taken by mouth could kill an average-sized adult.

Note that these warnings are expressed as amounts taken by mouth; however, most actual exposure is through skin and lungs. Thus, this system is not sufficient to guarantee safety; it is only one indicator. No materials with the **DANGER** indication should be used near children. It also follows that **WARNING** materials should be used only rarely on pests for which no **CAUTION** materials are registered. Whenever additional information is available about chronic toxicity it should be used to compare different materials to choose the least-hazardous pesticides.