INTEGRATED PEST MANAGEMENT (IPM) GUIDELINES AND POLICY FOR SCHOOL PEST MANAGEMENT

OVERVIEW

School administrators and other individuals responsible for, maintaining school buildings and grounds need to become aware of the various types of management options that are available for the control of pest problems. The public has become increasingly concerned about the environmental and health risks associated with the use of pesticides in conventional pest control programs, especially in areas where children are involved. They want to know that accurate and reliable information is being used before any action is taken to control pest problems within the school environment.

Serious consequences can result if pesticides are misused in the school environment. In addition, school boards and administrators could face potential liability suits if the best and most current information is not utilized when making pest management decisions. However, if the pest problems are not properly controlled they could result in liability and health problems.

Long-term planning and policy development can reduce liability concerning pest control in order to prevent potential problems from occurring. There can be significant cost savings and risk reduction over the long term by utilizing and incorporating the most effective pest control methods available. This can be accomplished through an established Integrated Pest Management (IPM) program. An IPM program can readily be incorporated into schools existing maintenance and management programs. The following steps need to be addressed and will assist in the development of either an in-house, or contracted, programs in establishing an effective IPM program.

SCHOOL DISTRICT POLICY STATEMENT

It is the policy of <u>(SCHOOL DISTRICT or SCHOOL</u> NAME) to implement Integrated Pest Management procedures to control structural and landscape pests and minimize exposure of children, faculty, and staff to pesticides.

PESTS

It is the policy of <u>(SCHOOL DISTRICT or SCHOOL NAME</u>) to control pests in the school environment. Pests such as cockroaches, fleas, fire ants, stinging wasps, termites, and rodents are annoying and can disrupt the learning environment in schools. Pests are known to bite, sting, or transmit diseases, and may also cause allergic responses.

PEST MANAGEMENT

It is the policy of <u>(SCHOOL DISTRICT or SCHOOL NAME</u>) to reduce exposure to pesticides in the school environment. When pesticides are used to control pests in schools, there is potential for human exposure. Excessive exposure may result in pesticide poisoning or allergic responses in sensitive individuals. Children may be more susceptible to pesticides than adults due to their smaller size and rapid growth and development. Their playful behavior may expose them to more pesticide residues.

Pests will be managed to:

- Reduce any potential human health hazard or to protect against a significant threat to public safety.
- Prevent loss or damage to school resources, structures or property.
- Prevent pests from spreading in the community, or to plant and animal populations beyond the school site.
- Enhance the quality of life for students, staff, and others.

The level of pest control and the method of pest management to be considered are as follows:

- Non-Chemical prevention of pest populations using methods such as sanitation, exclusion, and cultural methods.
- Application of pesticides only "as needed" to correct verified problems.
- Selecting the least hazardous methods and materials effective for control of targeted pests.
- Precision targeting of pesticides to areas not contacted or accessible to the children, faculty and staff.

The success of IPM in schools is dependent upon:

- Full Cooperation of Administrators, faculty, maintenance/custodial staff, parents and students.
- Establishment of a school district-wide IPM coordinator and advisory committee.
- School-based safety committees should include pest management and pesticide policy as part of their agenda.
- Each school shall designate a staff member to coordinate the IPM program and maintain pest management records.

Pest Management strategies maybe included in a pest management plan for the site and submitted on a voluntary basis to the Department of Environmental Management /Division of Agriculture for review and concurrence.

INTEGRATED PEST MANAGEMENT PROCEDURES

IPM procedures will determine when to control pests, and whether to use physical, horticultural or biological means. Chemical controls should be used as a last resort. IPM practitioners should depend on current, comprehensive information on the pest and its environment and the best available pest control methods. Consideration of IPM principles should prevent unacceptable levels of pest activity and damage. These principles should be based upon the most economical means and with the least possible hazard to people, property and the environment.

Typically, IPM programs will include the following components:

- 1. <u>Monitoring and Action Thresholds</u> Checking for pests, damage or other evidence of infestation, which will enable selection of the most appropriate pest control procedures.
- 2. <u>Safety</u> Incorporation of various pest control techniques to minimize the impact on occupants and other nontarget organisms.
- 3. <u>Education/Communication</u> Provide the necessary outreach and training to ensure that the staff has an understanding of the basic concepts of the IPM program and the role each plays.
- 4. <u>Recordkeeping and Reporting</u> provides essential information in determining the effectiveness of pest control procedures.
- 5. <u>Non-Pesticidal Control</u> Incorporates all pest control procedures that prevent pest problems.
- 6. <u>Pesticidal Control</u> Utilizes the judicious use of pesticides to control pest's problems.
- 7. Program Evaluation/Quality Assurance Pest control programs will be reviewed periodically to determine effectiveness and to identify aspects requiring modifications

It will be the policy of (SCHOOL DISTRICT or SCHOOL NAME) to utilize IPM principles to manage pest populations adequately. While the goal of this IPM program is to reduce the use of extremely toxic pesticides, use of pesticides may be necessary in certain situations.

When it is necessary to use a pesticide, than the least hazardous pesticide will be chosen. The application of such pesticides must be used according to it's label and is subject to the Federal Insecticide, Fungicide and Rodenticide Act, the Rhode Island Pesticide Control Act and all pertinent state and federal rules and regulations as well as School District policies and procedures, and applicable Occupational Safety and Health Administration regulations.

NOTIFICATION

It is the policy of (SCHOOL DISTRICT or SCHOOL NAME) to follow the requirements of the Rhode Island Pesticide Control Act § 23-25-37 which pertains to the notification of pesticides at schools.

As of July 1, 2001, (SCHOOL DISTRICT or SCHOOL NAME) will:

- Allow only licensed or certified applicators to apply pesticides within any building or on the grounds of any school,
- At the beginning of each school year, provide the staff of (<u>NAME of School</u>) and the parents or guardians of each child enrolled in (<u>SCHOOL NAME</u>), with a copy of the school's policy on pesticide applications on school property and a description of any pesticide applications made at the school during the previous school year.
- Such statement and description will be provided to the parents or guardians of any child who transfers to the school during the school year.
- The Department of Environmental Management and the Department of Health will develop regulations to (1) restrict the use of hazardous pesticides in schools, pre-schools, pre-school and childcare centers in Rhode Island; (2) for the promotion and implementation of integrated pest management (IPM) as defined in section 23-25.2.2: (3) to cover situations where an emergency application of pesticides must be conducted to eliminate an immediate threat to human health and establish reporting requirements for these emergency applications. (SCHOOL NAME) will develop a protocol to address emergency applications of pesticides and comply with the respective regulations.
 - Such statement shall include;
 - i) indication that the staff, parents or guardians may register for prior notification of pesticide applications at the school. (SCHOOL NAME) will maintain a registry of each person requesting such notice.
 - ii) a description of notification procedures and definitions for emergency situations.
- (SCHOOL NAME) shall maintain a registry of persons requesting pre-notification of pesticides applications.
- Such notification shall be provided to persons listed on the registry no later than twenty four (24) hours prior to such application and shall contain the following information:

- i) Notice shall be given by any means practical to the school staff that have registered for such notice.
- ii) The product's common or trade name and the name of the active ingredient of the pesticide(s) being applied.
- iii) The EPA Registration Number as listed on the pesticide label.
- iv) The pest(s) to be controlled
- v) The specific location(s) where the pesticide is to be applied. Examples of locations include but are not limited to: 1st floor classrooms, or classroom numbers, kitchen baseboards, boy's closets, boys lavoratories, baseball field, soccer field, lawn located at main entrance to school, lawn along Third St.)
- vi) The date of the application
- vii) The name of the school administrator, or a designee, who may be contacted for further information.
- No application of a pesticide will be made in any building or on the grounds of any school during regular school hours or during planned activities at the school.
- No child shall enter an area where the application has been made until it is safe to do so according to the provisions on the pesticide label.
- These requirements shall not apply to the use of germicides, disinfectants, sanitizers, deodorizers, antimicrobial agents, insecticidal soaps, non-volatile insect or rodent bait in a tamper resistant container, insect repellants or the application of a pesticide classified by the United States Environmental Protection Agency as an exempt pesticide under 40 CFR part 152.25.
- No later than July 1, 2002, the Department of Environmental Management and the Department of Health shall jointly establish a task force which shall specifically address methods to promote public education and professional training about pesticides, their potential health effects and IPM least toxic alternatives, and for evaluation and analysis of current pest control practices at school and child care facilities.
- On or after July 1, 2002, (SCHOOL NAME) shall provide notice of any application at a school, by any means practical, to the parents or guardians of any child enrolled at such school and to the staff of such school not later than twenty-four (24) hours after such application. Such notice shall include:
 - i) The common or trade name of the pesticide and the name(s) of the active ingredient(s)
 - ii) The EPA Registration Number as listed on the pesticide label.
 - iii) The target pests
 - iv) The exact location(s) of the application on the school property;
 - v) The date of the application
 - vi) The name of the school administrator, or a designee, who may be contacted for further information.

A copy of the record of each pesticide application will be maintained at the school for a period of five (5) years.

PESTICIDE APPLICATORS

Pesticide Applicators must be educated and trained in the principles and practices of IPM and the use of pesticides registered by the Environmental Protection Agency and the Rhode Island Department of Environmental Management. (SCHOOL NAME) will only allow pesticide applications to be performed either by school staff holding a valid Commercial Pesticide License or Certification or contract with a pest control company, licensed or certified to perform pest control services.

Pesticide applicators must follow all State and Federal Pesticide Statues and Regulations and follow all applicable label instructions and precautions.

No pesticide will be applied within any building or on the grounds of any school during regular school hours or during planned activities at any school, except for an emergency application that may pose an immediate threat to human health.