

## Model School IPM Policy, Prepared by the Northwest Coalition for Alternatives to Pesticides (NCAP), (1994)

[Explanatory notes are *italicized* and are not part of policy.]

Pesticides are designed to kill living organisms. As such, they pose risks to human and environmental health, and special risks to children. It is the goal of the school district to minimize pesticide use and thus exposure to students, staff and the public. Pests will be controlled to maintain the integrity of school buildings and grounds, to protect the health and safety of students and staff, and to maintain a productive learning environment. Pesticides will not be used to control pests for aesthetic reasons alone. The safety and health of students and staff will be paramount. To accomplish these goals, the school will adopt an Integrated Pest Management approach to pest prevention and control.

**Integrated Pest Management (IPM):** The district will attempt to prevent pest problems whenever possible. This will include regular pest inspections, sanitation and pest proofing measures, or modification of environmental conditions leading to pest problems. Procedures will be established for consideration of pest control implications of planned new construction or building or site modifications, to ensure that pest problems are not created.

When pest sightings are reported, the district will monitor and keep records of pest populations and control measures undertaken. Monitoring may involve the use of baits or traps to pinpoint problem areas. Such devices will be used only where inaccessible to children. Pesticide-containing baits or traps will be subject to the pest treatment guidelines below.

The district will establish pest tolerance thresholds to indicate pest population levels at which control measures will be undertaken. These thresholds will be consistent with the district's goals of maintaining the integrity of school buildings and grounds, protecting the health and safety of students and staff, and maintaining a productive learning environment. They will not be set based on aesthetic criteria alone. These thresholds may be numerical or narrative descriptions of pests or pest damage. Control measures will not be undertaken if pest damage or populations are below these levels.

When pests exceed tolerance thresholds, the following pest treatment guidelines will be used. 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 preferred.

Pesticides will be used only as a last resort, when other pest prevention and non-chemical control measures are unavailable, infeasible, or 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 least-toxic product that will meet pest management goals will be used.

No routinely scheduled (e.g., seasonal, monthly or weekly) pesticide applications will be made. No pesticide fogging or space spraying will be done. Insecticides will be used only in containerized baits, or for spot treatments targeted to insect nests or problem areas where a minimal amount of material is used. No highly acutely toxic (e.g., Toxicity Category I) pesticides will be used. No high volatility formulations will be used. No restricted use pesticides will be used. Pesticides will not be used if there is credible evidence that they cause cancer in humans or laboratory animals, or that they are reproductive toxins, endocrine disrupters, neurotoxins, or cause immune system dysfunction. No pesticide product will be used unless the district has received information from the manufacturer identifying the "inert" ingredients.

All pesticide applications will be done by certified pesticide applicators only. Pesticides will be applied only when no building occupants are present. All pesticide use will be subject to advance approval by the IPM Advisory Committee. Parents, school staff, and immediately adjacent school neighbors may appeal planned pesticide applications as provided for in other provisions of this policy. *[Note: Some feel that these are burdensome requirements, but a burdensome process can be a helpful disincentive to unnecessary pesticide use.]*

*If it becomes unworkable for the committee to review each proposed pesticide application, the committee can opt to pre-approve recommended treatments for specific pests, including preventive techniques, non-chemical methods, and "least-toxic" pesticides. If developed, these pre-approved guidelines should clearly define what constitute "last-resort" situations when least-toxic pesticides are allowed, as well as which least-toxic materials may be used to control a given pest. The committee should receive regular reports of any "pre-approved" pesticide uses that occur.*

*Some IPM policies include a list of specific pesticides banned for use, or a list of allowed materials (e.g., boric acid, soaps, diatomaceous earth, pheromone traps, certain baits, etc.). But, be aware that a list of banned materials will never be exhaustive. And a list of approved materials may encourage unnecessary use, and will need to be reviewed regularly as health and safety information changes or less-toxic materials or techniques become available.]*

The district will annually review its IPM program to evaluate how well its pest prevention and control objectives are being met, and to identify areas where more work is needed.

**IPM Coordinator:** The district shall appoint an IPM Coordinator. *[Note: Depending on the size of your school district, this could be a part time or shared position. In a larger district, some of these job responsibilities would fit under the job description of an Environment and Safety Specialist, while others would be delegated to custodial or maintenance staff or IPM contractors.]*

The IPM Coordinator shall have primary responsibility for ensuring that this IPM policy is carried out. Duties shall include: 1) Scheduling and facilitation of IPM Advisory Committee meetings; 2) Accurate identification of school pests, and research and development of suitable and cost-effective school IPM methods to enable continued reduction of pesticide use; 3) Coordination with site planning and maintenance staff and construction contractors to carry out procedures for consideration of pest control implications of planned new construction and building or site modifications; 4) Coordination with other staff to gather current information on pesticide or pest-related health and safety issues; 5) Coordination with custodial, building and grounds maintenance staff to ensure implementation of pest prevention measures; 6) Oversight of IPM contractors or staff engaged in monitoring of pest problems and pest management actions; 7) Coordination with principals and district administration to carry out posting and notification, recordkeeping, education and IPM training provisions of this policy; 8) Presentation of an annual report to the School Board evaluating the progress of the IPM program toward meeting the district's pest control and pesticide use reduction goals.

The IPM Coordinator will also work with other district personnel, including teachers, to identify and carry out ideas for student or community involvement in the district's IPM program (e.g., educational student projects, weeding events, or coordination with community sports teams for maintenance of district sports fields.) Along with district health and safety personnel, the Coordinator will ensure that federal, state and local pesticide laws are followed, such as label requirements, worker protection measures, recordkeeping, posting, notification, applicator licensing, and hazardous materials storage laws and requirements.

**IPM Advisory Committee:** The district will establish an IPM Advisory Committee to advise the IPM Coordinator and oversee the implementation of the district's IPM policy. The committee will be composed of 8 - 10 representatives from the affected community, including at least one parent, one teacher, two grounds and/or building maintenance staff, one school nurse, and others such as additional parents, students, school staff members, community health and IPM specialists, sports coaches, or neighbors. The committee will: 1) Set and revise tolerance thresholds for particular school district pests; 2) Develop and annually review pest prevention and treatment guidelines to ensure that they are based on the best available prevention techniques or least-toxic alternatives; 3) Review and recommend authorization or denial of pesticide use proposals, and forward proposals to superintendent for final authorization or denial; 4) Review and recommend action to the district superintendent in response to parental, staff, or neighbor appeals of planned pesticide use; 5) Evaluate district progress toward its pesticide use reduction/minimization goal; 6) Make recommendations for long term site planning and pest prevention.

**Other Pest Control Roles and Responsibilities:** The district superintendent; school principals; facilities (e.g., grounds and building) maintenance staff; custodians; construction, landscape, and IPM or pest control contractors or consultants; other school staff; students or other building occupants; parents; and the public; all have roles and responsibilities in carrying out this IPM program. *[Note: The superintendent's role described here may be delegated to grounds or building superintendents or principals in some districts.]*

**Superintendent:** The superintendent is responsible for final authorization or denial of pesticide use proposals forwarded by the IPM Advisory Committee. The superintendent is also responsible for taking action, based on recommendations from the IPM Advisory Committee, in response to parental, staff, or neighbor appeals of proposed pesticide use. Such action may include postponement or cancellation of planned pesticide use until further alternatives can be considered, a decision to proceed with pesticide use plans, or other measures to accommodate the concerns of parents or staff. The superintendent will notify individual parents, staff, and neighbors in writing of the district's decision in response to their appeal(s). The superintendent's office will also retain and make available for public inspection copies of school pesticide use records, pesticide MSDSs, pesticide product labels, and information about inert ingredients.

**Principals:** School principals have a key responsibility in ensuring that all pest sightings on the school site are reported promptly to the IPM Coordinator, and in working with the IPM Coordinator and building custodial staff to ensure that pest prevention and control measures are carried out within the guidelines of this IPM policy. Principals are also responsible for retaining and making available for public inspection copies of school pesticide use and pest control records, pesticide MSDSs, pesticide product labels, and inert ingredient information for any pesticide product used on the building site. Principals are responsible, in cooperation with school district administration, for ensuring that posting and notification provisions of this policy are carried out if pesticides are used.

**Maintenance and Custodial Staff:** District maintenance staff and school custodians are responsible for working with the IPM Coordinator to carry out pest prevention measures, monitoring of pest problems, pest management actions, and recordkeeping as described in this policy and its implementing procedures. Staff will submit any pesticide use proposals to the IPM Advisory Committee for review. Pesticides will be used only by certified pesticide applicators, and as approved by the IPM Advisory Committee and the district superintendent.

**Contractors:** The district will provide written notification to all pest control, construction and landscape contractors of the need to adhere to the district's IPM policy in any pest control, planning, new construction, repair or maintenance work done for the district. Pest control contractors will be hired to inspect and prevent, not just to treat, pest problems. Pest control contractors will be expected to write work orders for structural improvements or repairs and housekeeping and sanitation measures that may be required to reduce or prevent recurrence of pest problems. *[Note: NCAP can provide examples of pest control contract language.]* Pesticide use by contractors will be done only with the approval of the IPM Advisory Committee and superintendent as per this policy.

**Education and Training:** The school district will issue periodic information bulletins for parents, school staff, the school nurse, students, other building occupants, and the public, as appropriate, to inform them of important issues relating to the district's IPM policy, pesticide use guidelines, and their respective roles in pest prevention and sanitation. Teachers will be encouraged to incorporate school pest control and IPM information into curricula and class projects, and to find ways for students to participate in the implementation of the school's IPM program.

The district will also provide regular IPM training opportunities for the IPM Coordinator, maintenance and custodial staff, and staff pesticide applicators.

**Recordkeeping and public access to records:** The school district will keep records of pesticides used, and amounts and locations of treatments. Other pest control measures will also be documented. Pesticide use and pest control records, pesticide Material Safety Data Sheets (MSDSs), pesticide product labels, and manufacturer information about inert ingredients will be on file in the school principal's office as well as at school district

headquarters. These records will be available for public inspection during normal school operating hours. *[Note: If your state or locality requires pesticide use recordkeeping or use reporting, your policy will need to be compatible with these requirements.]*

**Parental, staff, student, and public notification and right to appeal:** All parents and school staff will be given notice at the beginning of the school year (or at the time of their child's registration at the school) of any proposed or pre-approved pesticide use for the coming year. Parents and staff will also be notified two weeks prior to any planned school use of pesticides. Neighbors immediately adjacent to school property will be given two weeks advance notice of outdoor pesticide applications. Parents, staff, and neighbors will be notified of the opportunity to appeal pesticide use plans to the IPM Advisory Committee at the start of the school year, or upon notification of a particular planned use of pesticides during the school year. The IPM Advisory Committee will consider all appeals received up to three days prior to the planned pesticide application. Appeals received within three days prior to the application will be considered by the superintendent. Prior to applications, classroom announcements will be made reminding students of indoor or landscape pesticide applications, with warnings to remain out of posted and flagged areas until signs are removed.

**Identification and notification of sensitive individuals:** The district will maintain a registry of chemically-sensitive students, staff, or others requesting special consideration in the event of the use of pesticides. The district will provide personal notification to these individuals two weeks prior to any planned pesticide use, and will make an effort to address their concerns and special needs relative to such pesticide applications.

**Posting:** Signs will be posted on main school doors and near site of planned applications 48 hours prior to pesticide use, and at the time of application. Pre-application signs will include the name of pesticide to be used, planned time of application, and information about availability of labels, MSDS and inert ingredients at school office. Post-application signs will indicate the material used, the time of application, warning or cautionary statements from product label, reentry information, and contact phone number for those seeking additional information. Outdoor applications will be cordoned off and flagged. Signs and flagging will be left in place for 7 days following application or until the reentry interval has elapsed, whichever is longer. *[Note: Some IPM practitioners feel that posting requirements are burdensome. NCAP believes that they are essential to protect school occupants. Even boric acid has caused illness when inadvertently dispersed through school rooms by a heating and ventilation system. This occurred because key personnel were not aware of the application or of the reentry and label requirements. Building occupants and grounds users need to be aware of pesticide applications in order to act appropriately and avoid inadvertent exposure. Posting also serves a valuable public education function. Pest control should not be a "hidden" function that nobody is aware is happening. Also be sure that your school's policy is consistent with any state or local pesticide posting or notification laws.]*

**Other School Policies to Review:** Be sure that each school's emergency evacuation plans spell out measures to be taken in the event of an in-school or nearby pesticide spill or exposure situation. A number of schools have mishandled pesticide-related emergencies, by not evacuating the building immediately, or by not contacting appropriate state agencies in a timely manner. Also, serious school exposures have occurred because of drift from nearby agricultural or backyard pesticide applications. Make sure that the school receives advance notification prior to any pesticide use on adjoining properties.

Also be sure that school policies spell out where and how pesticides are to be stored. Of course, such policies will have to adhere to local fire codes or hazardous materials regulations as well as other district safety rules. Hopefully, this will hardly be an issue if the district is making a good faith effort to carry out an IPM program.

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