Writing an Integrated Pest Management Policy for Your School District

Center of Expertise for School IPM
Protecting Children in Schools from the Health Risks associated with Pests and Pesticides

Pesticide Safety, Integrated Pest Management and Your School

Center of Expertise for School IPM
• Protecting the health of children is a top priority for the US Environmental Protection Agency.
• Children face increased risks to their health when they are exposed to pests and pesticides.
• US EPA recommends that all school districts implement programs that promote both the safe use of pesticides and the application of integrated pest management.
IPM Basics

- Pesticides
- Physical & Mechanical Controls
- Cultural & Sanitation Practices
- Education & Communication

Center of Expertise for School IPM
Benefits of School IPM

- **Smart:** addresses the root cause of pest problems
- **Sensible:** provides a healthier learning environment
- **Sustainable:** better long-term control of pests
Presenters

Ken McPherson
- Regional Coordinator for Pesticide Safety and IPM in Schools at U.S. EPA Region 6 in Dallas, Texas
- Board Certified Entomologist: medical & veterinary
- Masters in Biology and a Masters in Public Health
- Decades of IPM consultation and regulatory experience
- Medical Entomologist in U.S. Army; Retired- 22-years

Seth Miller, PhD.
- Assistant Superintendent at Westville School District #2
- Ph.D.- Educational Leadership & Administration, (IN S.U.)
- Master’s degree in Educational Leadership & Admin.
- Previously Assistant Principal Westville High School, Athletic Director, English teacher

Mervin Brewer
- Asst. Custodial Supervisor for Salt Lake City School Dist.
- School Custodian for 26 years ; plus Head Custodian
- Past 10 years he has been a district level Supervisor
- Past President of Utah School Custodial Managers Assoc.
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Kenneth R. McPherson, MPH, BCE
Regional Coordinator, Pesticide Safety and IPM in Schools
US EPA Region 6
Dallas, Texas
Purpose of a Policy

• Establishes ownership by school leaders
• Communicates goals, objectives, and intent to stakeholders
• Promotes a Corporate Culture of IPM
  – Encourages coordination
  – Directs or implies compliance
• Documents expected outcomes
  – Sets benchmarks to establish procedures
  – Focuses on core contributors to pest issues
Pesticide Safety and IPM Policy Components

- Policy Opening Statements
  - Expresses leadership commitment to pesticide safety and integrated pest management
  - Establishes a proactive culture to address pests
  - Focuses on the core issues and solutions to pest problems in schools
Policy Opening Statement

“It is the policy of {insert name} School District to manage pests in and around schools in a manner that protects human health, maintains the integrity of school buildings and grounds, and preserves the environment.

{insert name} School District is committed to the sustainable management of pests through the use of sound Integrated Pest Management (IPM) that focuses on eliminating pest access to food, water and shelter in and around our schools. This is accomplished through the use of reduced risk pest control methods with a preference for non-chemical control measures. Sanitation, pest exclusion and habitat modification are essential to successful long term pest mitigation. Buildings will be regularly cleaned and repaired in order to prevent pest infestations. All facilities and grounds will be maintained to be free of trash, debris and clutter. Ornamental plants, turf, and desirable grasses will be managed in a manner that limits animal, plant and microbial pest attraction.”
Pesticide Safety and IPM Policy Components

• Oversight and Management
  – Pesticide Safety and IPM Committee
    • Serves to advise district leadership
    • Multi-functional Members (School Nurse, Facility Manager, Food Service, Budget Manager, etc.)
  – District IPM Coordinator
    • Direct oversight of program
    • Key advisor to committee
    • Educator
Oversight and Management Statement

“{insert name here} School District will actively manage the pesticide safety and IPM program by establishing a committee whose responsibilities include providing guidance, education, and support on program procedures and processes. Members of the committee will be appointed by the district leadership and will include: the district leadership or designee, a board member, IPM coordinator, registered school nurse, administrative staff member, academic staff member, parent, one at-large community member, and facility manager. Other members may be appointed to meet the needs of this policy. The committee will meet semi-annually, or more frequently as required, to address the components of this policy.
Oversight and Management Statement

“An IPM coordinator will be appointed by the district leadership to provide oversight and implementation of the pesticide safety and IPM program. The IPM coordinator is the key advisor to the district and is responsible for: development and management of appropriate plans, pest control contract oversight, conduct of training on pesticide safety and IPM to district and school staff, records management, and providing guidance and recommendations on current regulations, procedures and products used in managing pest populations. The IPM coordinator will be trained in the principles of Integrated Pest Management and pest control contract oversight, completing a minimum of six (6) to eight (8) contact hours of training annually on the subject.”
Pesticide Safety and IPM Policy Components

• Annual Pesticide Safety and IPM Plan
  – Details components of district policy
  – Describes staff responsibilities
  – Lists approved pest control methods and products
  – Establish monitoring and pest reporting processes
  – Publish action thresholds
  – List medical priorities (health hazards)
  – Identify sensitive areas
Pesticide Safety and IPM Plan Statement

“The IPM coordinator will develop and submit a recommended pesticide safety and IPM plan annually to the committee for review. The IPM coordinator will submit the final draft, addressing committee comments, to the district leadership for submission to the board. The plan will address and detail the components of the district policy, list approved low hazard/toxicity products and methods by pest, and discuss the decision-making process for any pest mitigation effort, to include methods for monitoring, reporting pest sightings, action levels for the use of pesticides and a list of all environmentally sensitive areas that may be impacted by the district’s activities. Pests will be listed in order of medical importance to assist in prioritizing pest control efforts based on risks to students, staff and the community. The IPM coordinator, in coordination with the district school nurse, will develop actions for each pest of medical importance deemed a probable risk by the committee (head lice, bed bugs, fire ants, etc.).”
Pesticide Safety and IPM Policy Components

• Pesticide Safety
  – Reasonable pesticide use
  – Trained and certified applicators
  – Notification and posting of pesticide use
  – Exclude access to pesticide treated areas
  – Identify exempted practices
    • Baits and Gels inaccessible to children
    • Antimicrobials and sanitizers
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Pesticide Safety

Pesticide Use

“When reasonable non-chemical approaches do not provide adequate control, products that pose the least risk to people and the environment will be selected, and then only used when and where pests are present, or expected to be present, as determined by monitoring and action thresholds and approved by the IPM coordinator. Pesticide applications will not be made on a routine or regularly scheduled basis. The use of pesticides with the signal words ‘Warning’ and ‘Danger’ should be avoided. In documented emergency situations where the presence of a pest immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, the IPM coordinator may consider the use of pesticide products that do not fit the above criteria.”
Pesticide Safety

Certified Pesticide Applicators

“Only {insert state/tribe name} certified pesticide applicators trained in Integrated Pest Management will apply pesticides on {insert name} School District properties.”

Notification

“Students, staff and parents/guardians will be notified at least 24-48 hours prior to any pesticide application. For emergency applications where an imminent threat to health exists (e.g., stinging insects), students, staff, and parents/guardians will be notified within 24 hours after the pesticide application.”
Pesticide Safety

Posting & Exclusion

“Pesticide application sites will be posted with highly visible signage during and at least 24-48 hours after all pesticide applications. Postings will be labeled with the date of application, pest treated for, pesticide used, applicator name, certification number of applicator, phone number of applicator/company, and date/time reentry is authorized. For emergency applications where an imminent threat to health exists (e.g., stinging insects), postings must be placed as soon as practical, but no later than the start of the pesticide application.

Pesticides will not be applied when persons, other than pesticide applicators, are present or are expected to be present. All persons other than the pesticide applicators will be excluded from the treated site for at least eight (8) hours after the completion of any pesticide application, or as prescribed by the pesticide label, whichever is longer.”
Pesticide Safety

Exemptions

“The use of insecticide or rodenticide baits in pre-manufactured, tamper-resistant containers placed in areas inaccessible to children, insecticide baits in gel or paste form placed in cracks and crevices inaccessible to children, and antimicrobial pesticides, including sanitizers and disinfectants, are exempt from notification, posting and exclusion requirements unless specified otherwise on label directions. Rodenticide baits in tamper-proof containers are exempt from exclusion requirements, but must be labeled with all other posting requirements on the exterior of each container. Such containers should be limited to areas normally inaccessible to children.”
Pesticide Safety and IPM Policy Components

• Record Keeping

“Records will be maintained by the IPM coordinator of all monitoring and mitigation efforts, to include all in-house and contracted pesticide applications and copies of the pesticide applicators’ certifications for at least three (3) years after the date of the activity. Records documenting the use of all pesticide applications will include the applicator’s name, the product name, the product’s EPA registration number, quantity used, date and time of application, location, application method and the targeted pest. The IPM coordinator will also maintain records of committee minutes, training given to staff, continued education training taken, and exterior agency audits on environmental health, sanitation, and safety as they pertain to pesticide safety and pest mitigation for at least three (3) years from the date given or published.”
Pesticide Safety and IPM Policy Components

• Training
  – IPM Coordinator: 6-8 hours
  – Custodial/Food Service Staff: 1-hour
    • Sanitation
  – Facilities Management Staff: 1-hour
    • Maintenance and Repair
  – Teachers and Admin Staff: 1-hour
    • Clutter Removal
  – Students/Public: supplemental information
Pesticide Safety and IPM Policy Components

Training Statement

“Training of personnel is critical to the success of our pesticide safety and IPM program. Staff, students, and the public will be educated about pest problems associated with school settings, the components of IPM, the district policy, their roles in achieving pest-free schools, and procedures. Within five (5) months of the district adoption of this policy, the pesticide safety and IPM committee will agree on a plan to educate, train, and inform these constituencies. When we all learn to think pests as we go about our daily tasks, we will deny pests access to food, water and shelter, and make our schools unattractive to pests.”
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Model Pesticide Safety and IPM Guidance Policy for School Districts

- Best Management Practices
- Complements State, Tribal and Local requirements
- [http://www3.epa.gov/pestwise/publications/ipm/Model-School-IPM-Policy.pdf](http://www3.epa.gov/pestwise/publications/ipm/Model-School-IPM-Policy.pdf)
**What is IPM (the 2-minute Version)**

- My first thoughts on integrated pest management
- A state requirement to regulate the use of pesticides in schools
- Another binder to have in place to show the regional office of education during annual life safety walkthroughs
- More paperwork: district improvement plans, school improvement plans, technology plans, wellness policies, school lunch reforms, standardized testing, special education reporting, etc.
- And now IPM too!!!??
IPM at Westville

- Evolved from minimal compliance to a statewide model
- We utilized support from state and federal programs similar to this webinar to educate ourselves and improve our practices
- We were willing to make slight adjustments to the ways we thought about pest control and sanitation
Changes since Implementation

**BEFORE**
- We defined IPM by our “binder” and our pest control operator
- Monthly pesticide applications were based on our pest control schedule
- No real emphasis on how sanitation related to pest issues

**AFTER**
- Clear definition of how verifiable IPM is practiced
- Applications are only used as needed after monitoring
- Pest control technicians help diagnose issues with monthly monitoring visits
- 87% reduction of pesticide applications
- Significant focus on pest management as a district-wide responsibility
We Pay Attention to the Building in New Ways from a Pest’s Perspective
Dispelling Misconceptions

- IPM is more expensive
- IPM is more work
- You have to be a “bug guru” to something like this
- Without monthly pesticide applications there will be no way to prevent pests from running rampant
- If IPM is implemented correctly there will be no more bugs in the buildings
Integrated Pest Management is Important in Schools
Submitted by: Susan Ratcliffe
Director of the North Central Integrated Pest Management Center
Benefits we have Noticed

- Pesticide reduction and fewer pests
- Greater awareness and support from faculty in keeping the buildings clean
- No applications requiring notification and greater teacher awareness about applications
- Easier maintenance in day-to-day operations for custodial and kitchen staff
- Our most problematic teachers and classrooms have drastically improved their cleanliness
- Positive media coverage from the local newspapers for our efforts – increased pride
- EPA recognition and publications for our work
Creating Buy-In to Your IPM Plan

Environmental Protection Agency Webinar series
November 10th 2015

Mervin Brewer,
Assistant Custodial Supervisor

Salt Lake City School District
Custodial Services
Overview
Salt Lake City School District

- **Students**
  - 24,000 students
  - 53% are ethnic minority
  - 60% from low income families
  - 33% learning English as a second language

- **Facilities**
  - 36 schools - 3,800,000 Ft²

- **Expenditures FY12-13**
  - $18,245,000 M&O budget
  - Maintenance $1.90 per Ft²
  - Custodial $1.52 per Ft²
  - Utilities & other $1.38 per Ft²
  - Utilities & other $4.80 per Ft²

- **Capital improvements** $0.78 per Ft²
Misconceptions

- I need to do it all at once
  We have to have everything in place before we can even start
  **Reality:** Start small, start with the basics

- Too costly
  We have to invest a lot of money in start up cost
How to form a plan

The easy way: ‘Borrow’ it!
Find other successful programs, take the parts you can use and implement them into your program.
How to form a plan

The hard way: form a committee

Key committee members:

- Custodial
- Maintenance
- Facilities Service Director
- Risk Management
- Child Nutrition
- Grounds
- Principal(s)

Pick procedures, topics, make the plan as a committee.
The Hard Way: Key Personnel

- Motivated employees who share a common vision
- Empowered to plan and direct their own efforts
- Believe that their job is to be a caretaker of the environment rather than working on a list of daily assignments
- Embrace IPM as one more tool for maintaining safe and healthy schools
Organizational Structure is important

The responsibility to implement and manage an IPM program must be in the right hands.
Challenges

- Some demanding people
- Internal pushback
  Snide remarks from Maintenance personnel and some of the more seasoned Custodians.

Child Nutrition

- Pesticides
- Physical & Mechanical Control
- Cultural & Sanitation Practices
- Education & Communication
Reaching out / Training

IPM is a cooperative effort that requires sustained public relations for success. In order for IPM to work, Custodians, Kitchen personnel, Teachers and Principals, Maintenance and Grounds personnel **MUST** have ongoing training!

Public newsletters / blogs
It’s What The Community Wants

& Green

A Safe Environment!!

Safe from:
- Pest organisms
- arthropod vectored diseases
- Inappropriate chemical pesticide use
The End
Questions?
Upcoming School IPM Webinars

Dec. 15  Bed Bugs in Schools
Jan. 26  Stop School Pests and iPestManager – School IPM Educational Programs
Feb. 23  TBD
Mar. 15  IPM for Turf on School Grounds
Apr. 19  Vertebrate Turf Pests
May 17  Ants, The #1 Pest in Schools
Jun. 7  Termite Mitigation in Schools
CERTIFICATE OF PARTICIPATION

This is to certify the above participant attended the 90-minute webinar entitled

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PRESENTED BY: EPA’s Center of Expertise for School IPM

ON THIS DAY: November 10, 2015
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Questions?

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