

Model School IPM Policy

A. Policy Statement

The {insert name} School District recognizes that the maintenance of a safe, clean, and healthy environment for students and staff is essential to learning. It is the goal of the District to provide the safest and lowest risk approach to control pest problems, while protecting students, staff, the environment, and district property.

The District hereby adopts a Least-Toxic Integrated Pest Management (IPM) policy. This policy shall focus on long-term pest prevention and give non-chemical methods first consideration when selecting appropriate control techniques. The full range of alternatives, including taking no action, will be considered first, with chemical controls used as a last resort. Preference will be given to chemicals and methods of application that pose the least hazards to people and the environment. The District's long-term goal is the elimination of all chemical pest control methods.

B. Role of the IPM Coordinator

The IPM coordinator shall be named to coordinate the district's efforts to adopt IPM techniques, and shall be provided with training on least toxic pest management practices. Specific responsibilities include:

- Overall program management and providing proposed regulations or procedures and products for use in managing pest populations
- Education and training for IPM personnel
- Formal annual notification to parents, staff, and students of any potential chemical pesticide application
- Posting of warning signs for all pesticide applications
- Establishment and maintenance of a registry of parents, staff, and students who have indicated a desire for prior notification of each pesticide application
- Advance notification for individual pesticide applications
- Recordkeeping for any chemical pesticide application

C. Pesticide Product Selection and Use Approval

Selection of pesticide products will be based on the IPM coordinator's review of the product's contents, precautions, and adverse health effects. The IPM Coordinator will prioritize use of the following nontoxic products:

1. Approved Products

Mechanical or Biological Products

- Caulking agents and crack sealants
- Physical barriers
- Electronic products, heat, and lights

Chemical Products

- Soap-based products
- Borates, silicates, & diatomaceous earth

- Insecticide or rodenticide self-contained baits and traps
- Products consisting solely of active and inert ("other") ingredients on the FIFRA's 25(b) list (40 CFR part 152.24(g)(1))
- Fertilizer products containing combinations of nitrogen, phosphate, and/or potassium and not containing urea formaldehyde, lead, or any amount of chemical pesticide

2. Limited Use Products requiring board approval

If the product does not appear on the pre-approved list as described below, the IPM coordinator will seek final approval for its application from the board in a public meeting about which parents have been notified.

3. Banned Use Products List

The following high health risk pest management products will not be allowed on the approved list or as a limited use product:

- Pesticides linked to cancer (US EPA Class A, B, and C carcinogens and chemicals known to the state of California to cause cancer under Proposition 65)
- Pesticides that cause birth defects or reproductive or developmental harm (identified by the US EPA or known to the State of California under Proposition 65 as reproductive or developmental toxins)
- Pesticides that interfere with human hormones
- Pesticides classified as Toxicity Categories I and II by US EPA
- Foggers, bombs, fumigants or sprays that contain pesticides identified by the state of California as potentially hazardous to human health (CFR 6198.5)

4. Emergency Situations

The IPM committee may allow trained district staff or a company contracted with the district to provide pest control to apply a pesticide not on the approved or limited use lists only if necessary for the protection of public health, as officially directed by federal, state, or county health officials. Such exemptions shall be granted on a case-by-case basis and shall apply to a specific pest problem for a limited time.

5. Exemptions from Notification, Recordkeeping, and Reporting

Some pesticide products on the approved list are exempt from notification, recordkeeping, and reporting requirements. Pesticide products used as self-contained bait or trap, a gel or paste deployed as a crack and crevice treatment, any pesticide exempted under FIFRA (7 U.S.C. Sec.25 (b)), or antimicrobial pesticides, including sanitizers and disinfectants, are exempt.

D. Notice, Recordkeeping, and Reporting

In compliance with and in addition to the notification posting and record-keeping requirements mandated by the Healthy Schools Act, the district will notify parents, employees, and students of all pesticide applications using the following guidelines:

1. The district will provide annual notification to parents or guardians in the registration packet distributed at the beginning of each school year or upon enrollment. Notification will include information about the availability of:
 - a. The IPM Policy statement;

- b. The approved list of pesticide products;
 - c. IPM activity records in the main office of each school; and
 - d. A request that parents or guardians notify the school principal if they believe that their child's health and/or behavior would be influenced by exposure to pesticide products.
2. Notification of pesticide application will be given to interested parents through a process determined by the IPM committee, at least 72 hours prior to the application, if possible. The notification shall include: product name, the active ingredient(s) in the product, and the intended date of application.
 3. Records of each pesticide application shall be kept in accordance with the HSA requirements, shall be available upon request to the public and kept at the school site for a period of at least four years. Each record shall contain the following information: product name, manufacturer's name, EPA registration number, intended date and areas of application, reason for the pesticide application, and amount of product used. A copy of the warning sign posted for each application with the amount of pesticide used may be used to meet the recordkeeping requirements.
 4. Signs shall be conspicuously posted around any area where pesticides not on the approved list are to be applied in a non-emergency situation at least 24 hours before application, and shall remain posted for at least 72 hours after the application. In the event of an emergency, posting will go up as soon as possible, at the very least at the time of the application.

E. Contractors

All pest control companies contracted by the district shall follow all provisions of the policy. Licensed and certified pest control operators are required to include information on any school pesticide application they perform as part of their other reporting requirements, and such records shall be provided to the district.