



Model Pesticide Safety and IPM Guidance Policy for School Districts

Center of Expertise for School IPM



February 2015



The US EPA recommends that all school districts implement a policy addressing the safest possible use of pesticides and the implementation of a coordinated Integrated Pest Management program as part of a long-term and sustainable approach to mitigating pests and their impacts on children's health. By publishing a policy, the district leadership establishes his/her commitment to promoting a healthy environment where students are more productive.

This model pesticide safety and Integrated Pest Management guidance policy addresses not only the safety concerns when using pesticides, but also focuses on solution-based approaches to mitigate the reasons pests are in our schools. This is a proactive rather than reactive approach. As a result, it provides the school district, and its individual school campuses, a sustainable and long-term pest management alternative to traditional pesticide-only approaches.

This model guidance policy represents the US EPA recommendation for best management practices for the successful implementation of pesticide safety and Integrated Pest Management in kindergarten to 12th grade schools, and **is not intended to supersede State, Tribal or Local requirements, where those requirements are more stringent or specific.** To find out more about sustainable approaches to verifiable integrated pest management in schools, visit our web site at: www2.epa.gov/managing-pests-schools.

This model policy is available for use by administrators, educators, parents and others to help inform the development, adoption and/or improvement of policies for your district. The model policy is presented in sections in italics. Each section is introduced with background and rationale. For a modifiable Microsoft Word version of this document, visit www2.epa.gov/managing-pests-schools/ipm-tools-documents-support-ipm-implementation.

Policy Statement



These model policy statement opening paragraphs express the intentional commitment by the school district leadership to provide a safe, clean and healthy environment for students and staff through the use of reduced-risk methods to lessen pest problems and complaints. It is a commitment to eliminate the routine application of pesticides by focusing on preventing pest infestations through improved sanitation and pest exclusion, and making school facilities and grounds unattractive to pests. Here is an example of how an effective policy might begin:

"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 to 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."

Oversight and Management

Once you have stated your overall commitment, the following statement identifies the district leadership's approach to managing the school districts pesticide safety and IPM program. Oversight and management of this program can be characterized by support from two separate activities.

The first is establishment of a committee, or a charge to an existing committee, to provide multifunctional advice and consultation to the district leadership on enacting this policy and the risk, costs, and issues associated with decisions that affect the various pest management approaches. Pest management activities and their impact on student/staff health and safety cuts across multiple school programs and functions. Examples include, but are not limited to: school nurse (environmental health, pest-borne/pest associated disease risks, asthma, pesticide poisoning), facilities management (pest control, structural integrity, grounds management), custodial services (sanitation and waste management), food service (sanitation and food protection), administration (policies, funding, resources, community relations), teaching staff (classroom source reduction and student education), coaching staff (sports safety), parents (health and safety of students), pest management professional (contracted services), and the community at large (impact of campus activities on the broader community).

The second is the appointment of an IPM coordinator to provide direct oversight of the day-to-day activities of the program. The IPM coordinator should be trained in the principles of Integrated Pest Management, pesticide safety, pest control contract oversight, record keeping, and pesticide regulations. The US EPA recommends a minimum of six (6) to eight (8) contact hours of training annually from competent state, extension, or other agencies.



The IPM coordinator is also the key advisor to the committee charged with pest management and serves as the primary educator to the district and school staff on their responsibilities to the district policy and supporting program. An example oversight and management statement might read:

"{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, and one community member at large. 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.

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, 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."

Annual Pesticide Safety and IPM Plan

The US EPA recommends that all school districts develop and update an annual pesticide safety and IPM plan that details the components of the school district policy, describes staff responsibilities, lists all approved products and methods by pest, and discusses monitoring and reporting processes for pest infestations, as well as, action levels for the use of pesticides. Pests should be listed by order of medical priority or health risk to humans to assist with developing risk assessments and emergency pesticide application decisions associated with particular pest infestations. The plan should also list any environmentally sensitive areas, such as water protection zones, protected and endangered species, and culturally sensitive areas that may limit or impact specific pest mitigation activities. An example plan statement may read:

"The IPM coordinator will develop and submit a recommended pesticide safety and IPM plan annually to the committee for review and comment. 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 chemical management and a list of all environmentally sensitive areas that may be impacted by the district's pest management activities. Pests will be listed in order of medical or health risk importance to assist in prioritizing pest mitigation efforts based on risk to students, staff and the community.



The IPM coordinator, in coordination with the designated district school nurse, will develop and include appropriate action steps in the program plan for each pest of public health importance deemed a probable risk by the committee (head lice, bed bugs, fire ants, etc.).

Pesticide Safety

The use of Integrated Pest Management does not exclude the use of pesticides, but rather encourages the use of multiple mitigation approaches, and when deemed necessary those pesticides that pose the least risk to humans and the environment. Pests that, by their nature and/or numbers, pose significant risk to human health and safety, structural integrity, or economic loss must be controlled. When reasonable non-chemical measures do not provide adequate control, pesticides may be needed. Since children are at the greatest risk to exposure to pesticides, the US EPA recommends a careful approach where pesticides with the least potential for exposure and lowest toxicity are selected.

It is recommended that the use of pesticides be approved by the IPM coordinator and only applied by State/Tribally certified pesticide applicators who are knowledgeable in Integrated Pest Management. Students and staff should be notified of all pesticide applications 24-48 hours prior to their application except in cases of emergency. Treated areas should be posted with highly visible signs, and pesticides should not be applied when people are present or expected to be present per the pesticide's label re-entry statements or for at least eight (8) hours after application of the pesticide, whichever is greater. Examples of statements addressing the components of pesticide safety might read:

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."

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."



Posting

“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, with a preference to no later than the start of the pesticide application.”

Exclusion

“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.”

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.”

Record Keeping

Record keeping is critical to analyze, evaluate and determine the efficacy of any pesticide safety and IPM program. Well maintained and accurate records provide a means to verify that the policy is being followed, identifies historical trends and repetitive issues, and justifies decisions and actions taken to mitigate pests. An example of a record keeping statement may read:

“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.”



Training

Training and education of personnel are essential to a successful pesticide safety and IPM program. The US EPA recommends that staff, students, and the general public receive appropriate education on the subject and program, as well as their responsibilities to the program and how their actions determine success or failure. Such training and education build a culture of pest-free schools and leads to sustainability of the program beyond the presence of a single individual or office.

As stated previously, certified pesticide applicators and IPM coordinators require specific training related to pest, pesticides, and approaches. But, all others require training and education specific to the impact their individual activities have on successful pest management.

- Custodial and food service staff should be trained a minimum of one (1) hour annually on the components of IPM and how their efforts towards sanitation impact pest infestations.
- Facilities management personnel should be trained a minimum of one (1) hour annually on the components of IPM and how their efforts to sealing the building envelope and repairing water leaks impact pest infestations.
- Teachers and administrative staff should be trained a minimum of one (1) hour annually on the components of IPM and how their efforts for clutter removal and general classroom/office sanitation impact pest infestations.
- Students and the general public should be provided direct and supplemental education/information on the district's program, and how they contribute to success of the program.
- All personnel should be trained on how to identify and report pest problems and conditions that lead to pest infestations.

An example training statement may read:

“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.”



Resources

The US EPA's Center of Expertise for School Integrated Pest Management provides leadership and expertise to effectuate the goal of ensuring that millions of children in our Nation's schools benefit from IPM practices and verifiable IPM programs. The Center may be reached by email at school.ipm@epa.gov.

Each US EPA Regional Office has a School IPM Coordinator who works with change agents, states, and tribes to promote verifiable and sustainable IPM programs. Find your Coordinator at www2.epa.gov/managing-pests-schools/contacts-epas-regional-offices-school-ipm.

The EPA booklet, *Pest Control in the School Environment: Adopting IPM* (www2.epa.gov/managing-pests-schools/pest-control-school-environmentadopting-integrated-pest-management), encourages and assists school officials in examining and improving their pest management practices. It identifies ways to reduce the risk of pests and pesticides in school buildings and landscapes.

EPA's website (www2.epa.gov/managing-pests-schools) provides valuable IPM information for administrators and others with decision-making responsibilities for pest management in and around schools.