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**HEALTHY AND SAFE SCHOOLS**

**INTEGRATED PEST MANAGEMENT PLAN**

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## I. INTRODUCTION

Structural and landscape pests can pose significant problems in school facilities and on vehicles that transport students. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority, and a prerequisite to learning, it is the policy of Seaside School District to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all School Districts to implement integrated pest management in their facilities. For this reason, the *Board of Directors* endorses this integrated pest management plan for use on the facilities in our School District.

## II. WHAT IS INTEGRATED PEST MANAGEMENT?

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.



Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest-conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, adequately cleaning buses and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical controls.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.

### **III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?**

ORS 634.700 defines an IPM plan as a proactive strategy that:

- A. Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:
  - 1. Protect the health and safety of students, staff and the community;
  - 2. Protect the integrity of School District buildings and grounds;
  - 3. Maintain a productive learning environment; and
  - 4. Protect local ecosystem health.
- B. Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;
- C. Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;
- D. Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;
- E. Evaluates the need for pest control by identifying acceptable pest population density levels;
- F. Monitors and evaluates the effectiveness of pest control measures;
- G. Excludes the application of pesticides on a routine schedule for purely preventive purposes,

- other than applications of pesticides designed to attract or be consumed by pests;
- H. Excludes the application of pesticides for purely aesthetic purposes;
- I. Includes school staff education about sanitation, monitoring and inspection and about pest control measures;
- J. Gives preference to the use of nonchemical pest control measures;
- K. Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and,
- L. Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for Seaside School District's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for our School District.

Note: As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, we will not set out any ant or cockroach baits until first:

1. Informing staff in the area where the pests are that sanitation and exclusion are the primary means to control the pest;
2. Establishing an acceptable pest population density;
3. Cleaning up any food debris in the area;
4. Sealing up any cracks or crevices where we know the pests are coming from; and
5. Setting out sticky insect monitoring traps in the area using the sticky insect monitoring trap protocol.

#### **IV. SCHOOL DISTRICT IPM PLAN COORDINATOR**

The *Board of Directors* designates the Maintenance Supervisor as the IPM Plan Coordinator. The IPM Coordinator is of key importance to successful IPM implementation in our School District, and is given the authority for overall implementation and evaluation of this plan. The IPM Coordinator is responsible for:

- A. Attending not less than six hours of IPM training each year. The training will include a general review of IPM principles and the requirements of ORS 634.700 – 634.750. It will also include hands-on training on updated exclusion practices, monitoring and inspection techniques and management strategies for common pests. ORS 634.720 requires IPM plan coordinators to complete six hours of training each year. If the Maintenance Supervisor is unable to take annual training for emergency reasons,

another qualified School District designee will be assigned.

- B. Conducting outreach to the school community (custodians, maintenance, grounds, staff, and food service staff) about the District's IPM plan. Training will be provided to as outlined in Section V below. This training will be assigned through the Superintendent's office using the approved School District's online training program.
- C. Overseeing pest prevention efforts. The IPM Coordinator will work with administration, custodian/maintenance/grounds and staff to reduce clutter and food in the schools and buses, and seal up pest entry points.
- D. Assuring that the decision-making process for implementing IPM in the School District (section VI) is followed. The IPM Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.
- E. Assuring that all notification, posting and record-keeping requirements in section VII are met when the decision to make a pesticide application is made.
- F. Maintaining the approved pesticides list as per section VIII.
- G. Responding to inquiries and complaints about noncompliance with the plan. Responses to inquiries and complaints will be in writing and kept on record with the IPM Coordinator.
- H. Placing and checking sticky insect monitoring traps around facility.
- I. Keeping records of pest complaints using pest logs located in each school facility. Primary record keeper and contact in each facility is the building custodian or Transportation Supervisor; however, a carbon copy email to the IPM Coordinator is also requested.
- J. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Coordinator will be involved in drafting any bids, and will have the authority to halt construction projects if protocols and provisions for pest avoidance and prevention are not being met.

## **V. RESPONSIBILITIES and TRAINING/EDUCATION of SCHOOL STAFF**

ORS 634.700 (3) (i) Requires staff education "about sanitation, monitoring and inspection and about pest control measures". All staff should have at least a general review of IPM principles and strategy as outlined in Sections II and III.

### **A. IPM Plan Coordinator**

1. Training (see section IV above)

2. Responsibilities (see section IV above)

B. Custodial/Maintenance/Grounds Staff

1. Training/Education

Custodial: Custodial staff will be trained at least annually on sanitation, monitoring, inspection, and reporting and their responsibilities.

Maintenance: Maintenance staff will be trained at least annually on identifying pest-conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks), and their responsibilities.

Grounds: Grounds staff will be trained at least annually on sanitation, monitoring, inspection, and reporting and their responsibilities. Each year before the training, the IPM coordinator will review the annual report of pesticide applications. Training will include review of this IPM plan, as well as data from the annual report related to pesticide applications on grounds.

2. Responsibilities – This is a combined responsibilities list for custodial, maintenance and grounds staff due to the required meshing of job requirements amongst the different positions.

- a. Take annual IPM training provided by the approved District's online training program.
- b. Continually monitoring for pest-conducive conditions during daily work, and sealing small holes and cracks when noticed (if this can be done in a short amount of time).
- c. Reporting pest problems and pest-conducive conditions that cannot be resolved in a short amount of time to the IPM Coordinator.
- d. Reporting staff to the IPM Coordinator who repeatedly refuse to or need assistance to reduce clutter and other pest-conducive conditions in facilities.
- e. Confiscating - reporting any unapproved pesticides (such as aerosol spray cans) discovered in their regular duties or during an inspection and delivering them -reporting them to the IPM Coordinator and building administrator.
- f. Assisting IPM Coordinator with resolving issues found in annual inspection report.
- g. Working with the IPM Coordinator to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time.
- h. Working with the IPM Coordinator to reduce conditions conducive to weeds,

gophers, moles, yellow jackets, and other outdoor pests.

- i. Keeping vegetation (including tree branches and bushes) at least 18 inches from building surfaces.
- j. Proper mulching in landscaped areas to reduce weeds.
- k. Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds.
- l. When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VII.

## C. Food Service Staff

### 1. Training/Education

Food service staff will be trained at least once per year on the basic principles of IPM and their responsibilities as outlined below.

### 2. Responsibilities

Food service staff are responsible for:

- a. Completing annual IPM training provided by the District's approved online training program.
- b. Assuring floor under serving counters and movable equipment is kept free of food and drink debris.
- c. Avoiding long-term storage or use of cardboard boxes.
- d. Removing recycle products daily.
- e. Keeping outside doors closed at all times (except during deliveries and emptying trash).
- f. Keeping all food items in sealed containers.
- g. Immediately reporting any sightings of rodents or rodent droppings to a building custodian, and following up with an email to the IPM Coordinator.
- h. Reporting to the building custodian and/or the IPM Coordinator any pest-conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, drains need scrubbing, build-up of floor grease requiring spray-washing, etc.).

## D. Staff

### 1. Training/Education

All staff will be trained at least once per year on the basic principles of IPM and their responsibilities as outlined below. Paid coaches will also be required to take the annual IPM training through the District's approved online training program.



## 2. Responsibilities

Staff are responsible for:

- a. Completing annual IPM training provided by the District's approved online training program.
- b. Keeping classrooms, buses, vehicles and work areas free of clutter.
- c. Making sure students clean-up after themselves when food or drink is consumed.
- d. Reporting pests and pest-conducive conditions to the building custodian, in-person or by e-mail; as well as, an email to the IPM Coordinator. Transportation department should report to the Transportation Supervisor.

## E. Administrators

### 1. Training/Education

Administrators will be required to complete the annual IPM training through the District's approved online training program. Also, annually at a leadership training meeting, the IPM Coordinator will review the following:

- a. What pest-conducive conditions are (clutter, food debris, moisture, cracks, holes, etc.) and the importance of reporting these in a timely manner.
- b. The importance of keeping areas free of clutter.
- c. The importance of students cleaning up after themselves when food or drink is consumed.

### 2. Responsibilities

The Administrator is responsible for:

- a. Scheduling time for staff to receive annual training provided by the District's approved online training program.
- b. Assuring that staff keep rooms clean and free of clutter in accordance with IPM instructions.
- c. Assuring that all staff, students and parents are aware of the list (provided by the IPM Coordinator) of potential pesticide products that could be used on school property as posted on the District's website.
- d. Working with the IPM Coordinator to make sure all notifications of pesticide applications reach all staff, students and parents through the School District's website.

## VI. IPM PROCESS

- A. Monitoring – Reporting – Action Protocol. Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of Seaside School District’s IPM Program. It provides recent and accurate information to make intelligent and effective pest management decisions. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always written down. As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.
1. Monitoring & Reporting – All Staff. Staff are expected to report pests or pest-conducive conditions they observe during the normal course of their daily work. Reporting will be done verbally or by e-mail. Both building custodial staff, as well as, the IPM coordinator should be notified of any issues.
  2. Monitoring & Reporting – IPM Coordinator and Custodial/Maintenance/Grounds Staff. During the normal course of their daily work, the IPM Coordinator and custodial/maintenance/grounds staff will monitor structures and building perimeters for:
    - a. Pest-conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage).
    - b. The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests).
    - c. The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.).
    - d. Human behaviors that affect the pests (food preparation procedures, concessions procedures, classroom food, etc.).
    - e. Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.
    - f. During normal daily activities, monitor for invasive weeds, gophers, moles, yellow jackets, and other outdoor pests
    - g. Any pests or pest-conducive conditions will be reported to building custodial staff, as well as, the IPM coordinator.
  3. Sticky monitoring traps for insects. Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest’s presence, their reproductive stage, the likely direction pests are coming from, and the number of pests. All staff will be made aware of the traps and their purpose so they do not disturb them. The building custodial staff and/or IPM Coordinator will be responsible for setting them out and checking them once per week, and replacing them once every four months. Sticky

monitoring traps will be placed in the kitchen and any other “pest-vulnerable areas” the IPM Coordinator deems necessary. Kitchen sticky insect traps will be checked weekly (primarily for drain flies, ants, and cockroaches).

4. **Monitoring for Mice.** In addition to monitoring for signs of mice (droppings, gnawing, hair, etc.), snap traps will be placed in the kitchen (and any other area the IPM Coordinator deems necessary), and checked weekly by the IPM Coordinator and/or Custodial/Maintenance/Grounds staff.
5. **Reporting (pests, signs of pests, and conducive conditions).** When staff observes pests or pest-conducive conditions they should contact building custodial staff, as well as, the IPM coordinator.
6. **Reporting “Pests of Concern”.** “A pest of concern” is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice and rats (disease vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest). When pests of concern (or their droppings, nests, etc.) are observed, staff should contact the building custodial staff, as well as, the IPM coordinator.
7. **Action!**
  - a. **Structural.** Any items (such as sealing up holes) that custodial/maintenance/grounds staff observes that they can resolve should be taken care of and reported to IPM Coordinator. The IPM Coordinator will keep records of these actions using Pest Logs. If the actions needed are not something that can be accomplished alone with minimal time, the IPM Coordinator will meet with them to develop a plan of action with a proposed deadline for completion based on the severity of the risk or nuisance. The IPM Coordinator will inform the Business Manager of actions being taken/work performed, and monitor the completion of all work. The IPM Coordinator will keep records of actions taken/work performed using Pest Logs.
  - b. The IPM Coordinator will keep records of actions, time, and money spent to manage pests.
8. **Acceptable Thresholds.** A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is zero (0). Acceptable thresholds for other pests will be determined on a case by case situation by the IPM Coordinator with input from the Business Manager and/or Superintendent.

B. **Inspections.** The IPM Coordinator will conduct an annual inspection using the annual IPM

inspection form. During the inspection the IPM Coordinator will also inspect or review:

1. Human behaviors that affect the pests (working conditions that encourage or support pests, food preparation procedures that provide food for pests, etc.)
2. Management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

- C. Pest Emergencies (see also Section VII. B. below). IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

When the IPM Coordinator, after consultation with school faculty and administration, determines that the presence of a pest or pests immediately threatens the health or safety of students, staff or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school facilities or vehicles. The IPM Coordinator will keep records of actions taken using Pest Logs.

- D. Annual IPM Report (completed by IPM Coordinator). The IPM Coordinator may be required to provide the Board of Directors and the OSU School IPM Program Coordinator an annual IPM report. The report may include a summary of data gathered from Pest Logs, e-mails and IPM Coordinator's notes, as well as costs for PMPs and pesticides (including turf and landscape pesticides). Costs for items such as sealants, fixing screens, door sweeps and other items that would not normally be considered part of pest control will not be recorded.

## **VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING**

Any pesticide application (this includes weed control products, ant baits, and all professional and over-the-counter products) on school property must be made by a licensed commercial or public pesticide applicator.

- A. Notification and Posting for Non-emergencies. When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. *Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Coordinator.*

Non-emergency pesticide applications may occur in or around a school before, during or after school is in session, unless the IPM Coordinator authorizes an exception. If the labeling of a pesticide product specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of

that reentry time. If the labeling does not specify a reentry time, a pesticide may not be applied to an area of a campus where the school expects students to be present before expiration of a reentry time that the IPM Coordinator determines to be appropriate based on the times at which students would normally be expected to be in the area, area ventilation and whether the area will be cleaned before students are present. The IPM Coordinator (or designee) will give written notice of a proposed pesticide application via the School District's website at least 24 hours before the application occurs.

The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application. The IPM Coordinator (or designee) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs. A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Coordinator).

- B. Notification and Posting for Emergencies. The declaration of the existence of a pest emergency is the only time a non low-impact pesticide may be applied. If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Coordinator shall send the notice no later than 24 hours after the application occurs. The IPM Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs. *Note: ORS 634.700 also allows the application of a non-low-impact pesticide "by, or at the direction or order of, a public health official". If this occurs, every effort must be made to comply with notification and posting requirements above.*

Important Notes:

- 1. The IPM Coordinator may not declare the existence of a pest emergency until after consultation with administration, Business Manager and Superintendent.*
- 2. If a pesticide is applied at a campus due to a pest emergency, the IPM Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a written report of such to the Board of Directors.*
- 3. The Board of Directors shall review and take formal action on any recommendations in the report.*

C. Record Keeping of Pesticide Applications. The IPM Coordinator (or designee) shall keep a copy of the following pesticide product information on file at the custodian's office at the school where the application occurred or in the Transportation Supervisors office and at the office of the IPM Coordinator:

1. A copy of the label.
2. A copy of the SDS.
3. The brand name and USEPA registration number of the product.
4. The approximate amount and concentration of product applied.
5. The location of the application.
6. The pest condition that prompted the application.
7. The type of application and whether the application proved effective.
8. The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide.
9. The name(s) of the person(s) applying the pesticide.
10. The dates on which notices of the application were given.
11. The dates and times for the placement and removal of warning signs.
12. Copies of all required notices given, including the dates the IPM Coordinator gave the notices.

The above records must be kept on file at the custodian's office at the school where the application occurred, or in the Transportation Supervisor's office at bus garage and at the office of the IPM Coordinator, for at least four years following the application date.

D. Annual Report of Pesticide Applications. The IPM Coordinator may be required to provide the Board of Directors and the OSU School IPM Program Coordinator an annual report of all pesticide applications made the previous year. The report should contain the following for each application:

1. The brand name and USEPA registration number of the product applied.
2. The approximate amount and concentration of product applied.
3. The location of the application.
4. The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application.
5. The type of application and whether the application proved effective.

## **VIII. APPROVED LIST OF LOW-IMPACT PESTICIDES**

Note: All pesticides used must be used in strict accordance with label instructions.

According to ORS 634.705 (5), the Board of Directors of Seaside School District shall have a list of low-impact pesticides for use with their integrated pest management plan. The list may include any product except products that:

- (a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;
- (b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
- (c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7378 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu) for assistance in determining a pesticide a.i. cancer classification.

The most current list of approved low-impact pesticides is available on the District’s website at [www.seaside.k12.or.us](http://www.seaside.k12.or.us) > School Safety > IPM Information.

## **IX. CONTRIBUTORS TO THE IPM SMALL SCHOOL IPM MODEL PLAN**

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