Sample Policy Statement

Example #1

Taken from Illinois Department of Public Health Integrated Pest Management Guideline for Public Schools and Licensed Day Care Centers

Modeled from the Government Services Administration's Integrated Pest Management Policy

*This policy statement is **for information only**; it should **not** be considered to be **an "official"** Illinois Department of Public Health policy statement on IPM in schools.*

Example School Pest Management Policy Statement

SCHOOL PEST MANAGEMENT POLICY STATEMENT

Structural and landscape pests, as well as the pesticides used to control them, can pose significant hazards to people, property and the environment. It is known that children have a relatively higher risk from exposure to pesticides than do adults exposed at the same levels. Proportionally, they have a higher respiratory rate and eat/drink more than adults. In addition, children have a natural tendency to put objects in their mouth, and spend more time on or near the ground than adults. A child's neurological system is still developing and is more susceptible to chemicals in their environment compared to adults. With these cultural and biological differences, children have a higher potential for pesticide poisoning than adults. The district/facility is implementing this IPM program to effectively manage pests, while reducing the chance of accidental exposure of pesticides to children and staff. Over time, this proactive approach will control pests more effectively than just using pesticides alone. It is, therefore, the policy of this district/facility to utilize Integrated Pest Management (IPM) procedures for control of structural and landscape pests.

As defined by the Structural Pest Control Act (225 ILCS 235/3.24), IPM is a pest management system that includes the following elements whenever possible:

- identifying pests and their natural enemies;
- establishing an ongoing monitoring and record keeping system for regular sampling and assessment of pest and natural enemy populations;
- determining the pest population levels that can be tolerated based on aesthetic, economic and health concerns, and setting action thresholds where pest populations or environmental conditions warrant remedial action;
- preventing pest problems through improved sanitation, management of waste, addition of physical barriers, and the modification of habitats that attract or harbor pests;
- relying to the greatest extent possible on nontoxic, biological, cultural or mechanical pest management methods, or on the use of natural control agents;
- when necessary, using chemical pesticides, with preference for products that are the least harmful to human health and the environment; and
- record keeping and reporting of pest populations, surveillance techniques and remedial actions taken.

Pests

Pests include arthropods (insects, spiders, mites, ticks and related pests), wood- infesting organisms such as fungi, rats, mice, nuisance birds and any other undesirable organisms in, on or under structures, excluding bacteria and other microorganisms on or in humans or other living animals.

IPM Coordinator

The district/facility shall appoint an IPM coordinator who shall have primary responsibility for ensuring that this IPM policy is carried out.

Roles and Responsibilities

Specific roles and responsibilities for the development, implementation and maintenance of the IPM program will be established, communicated and enforced by the district/facility to ensure the proper implementation of the IPM program.

Pest Management Objectives

The objectives of the IPM program are:

- Manage pests found on school sites to prevent interference with the learning environment;
- Prevent injury to students, staff and other occupants;
- Preserve the integrity of school buildings or structures;
- Prevent pests from spreading in the community or to plant and animal populations beyond the site; and
- Enhance the quality of life for students, staff and others.

Integrated Pest Management Procedures

Integrated Pest Management is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interactions with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property and the environment. IPM programs take advantage of all pest management options available, including the judicious use of pesticides.

Understanding pest survival needs is essential to implementing IPM effectively. Pests seek habitats that provide basic needs such as air, water, food and shelter. Pest populations can be prevented or controlled by creating conditions that are not conducive to their survival. This can be accomplished through the removal of pests' basic needs or by simply blocking their access into buildings. Pests also may be managed by using a variety of non-chemical, as well as chemical methods, as needed, to reduce infestations to acceptable levels and minimize children's exposure to pesticides.

IPM procedures will determine when to actively control pests and whether to use mechanical, physical, chemical, cultural and/or biological means. IPM coordinators depend on current, comprehensive information on the pest and its environment and the best available pest control methods. Applying IPM strategies prevents unacceptable levels of pest activity and damage by the most economical means and with the least possible hazard to people, property and the environment.

The choice of using a pesticide will be based on a review of all available options and a determination that these options alone are not acceptable, feasible or adequate. Selected non-chemical pest management methods will be implemented whenever possible. It is the policy of this district/facility to utilize IPM strategies and IPM pest outlines as a guide to manage pest populations adequately.

When it is determined that a pesticide must be used to meet the IPM objectives, the least harmful to human health and the environment will be used judiciously. The application of pesticides is subject to the Federal Insecticide, Fungicide and Rodenticide Act (7 USC 136 et seq.), school district policies and procedures, U.S. Environmental Protection Agency (U.S. EPA) regulations in 40 CFR, Occupational Safety and Health Administration regulations, and state and local regulations.

This district/facility recognizes and adheres to the following procedures:

- Integrated Pest Management programs are designed to prevent pest problems whenever possible. This is done through monitoring, regular inspections, high standards of sanitation and pest-proofing measures, and modification of environmental conditions conducive to pest problems.

- The district/facility will establish periodic inspection, monitoring and reporting procedures. All personnel involved in these activities will be informed and trained to perform specific roles within the IPM program. Forms will be provided by the district/facility to aid staff and pest professionals in performing and recording actions.

- The district/facility will establish pest tolerance thresholds and response times for common pests. These thresholds will serve as indicators for the implementation of active control measures. Control measures will not be undertaken if pest damage or populations are below threshold levels unless special circumstances necessitate reduction of a pest population. In such cases a review of the tolerance thresholds will be conducted.

- When pests exceed tolerance thresholds, non-chemical pest control measures and IPM strategies as described in the IPM pest outlines will be practiced and action will occur within the specified response time.

- Pesticides will be used when appropriate, along with other management practices,

when other pest prevention and non-chemical control measures have failed to reduce pests below tolerance thresholds. When a pesticide must be used, products that are the least harmful to human health and the environment will be used.

- Pesticides will be used only in containerized baits, or for spot treatments targeting insect infestations or problem areas where a minimal amount of material can be used. Routine spraying for pests is prohibited. Rodent baits shall not be used unless in tamper-resistant bait boxes. Bait boxes shall be inaccessible to children and secured when appropriate. Routine general spraying of non-target pests is prohibited.

- All pesticide applications must be approved by the IPM coordinator prior to application. All notification requirements will be met before the pesticide application. The school district/school/day care center will follow all applicable regulations requiring applicator licensing and all personnel will be licensed appropriately before being required to administer a pesticide. Pesticides shall be applied in minimum amounts and shall not be used when children and staff are present in the treatment area. Toys and other items mouthed or handled by children must be removed from the area before pesticides are applied. No one will return to the treated area within two hours after a pesticide application or as specified on the pesticide label, whichever time is greater.

- The application of pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), U.S. EPA regulations, Occupational Safety and Health Administration regulations, and state and local regulations.

- Follow-up inspections and monitoring will be performed to determine the effectiveness of the IPM strategies applied. The IPM coordinator will continually update the IPM plan with the knowledge gained from the follow-up inspections.

- The IPM plan will be reviewed annually to ensure all activities that take place in the facility are addressed and that current IPM strategies are included.

Education

Staff, students, IPM coordinator, contractors, and the public will be informed about potential school pest problems and the IPM policies and procedures set in place to achieve the desired pest management objectives.

- Parents/Guardians will be informed annually about the IPM policy;
- Staff will receive information and/or training on their role in the IPM plan.

IPM Plan Updates and Review

The IPM coordinator will continually update the IPM plan with knowledge gained from the implementation of IPM strategies. The IPM plan will be reviewed annually to ensure

all district/facility activities are included in the plan and the plan contains the most current IPM strategies.

Record Keeping

A complete and accurate pest management log will be maintained for each property and kept with the IPM plan. Pesticide use records also will be maintained to keep a historical account of pesticide use. The district/facility will keep a logbook containing the following:

- inspection sheets;
- pest surveillance data sheets that record in a systematic fashion the type and number of pests or other indicators of pest population levels revealed by the monitoring program. Examples include: date, number, location and rodent species trapped or carcasses removed; and date, number and location of new rat burrows observed;
- pest sighting forms and action taken;
- a diagram noting the location of pest activity including the location of all trapping devices and bait stations in or around the site; and
- a copy of the current EPA-registered label and Material Safety Data Sheet (MSDS) for each pesticide product used on the site, records of where each was used, and the amount applied.

Notification

The school/district/day care center takes the responsibility to notify students' parents/guardians and school staff upcoming pesticide treatments. Notification of antimicrobial agents such as disinfectants, sanitizers, deodorizers or pesticides in bait form is not required. The Illinois Structural Pest Control Act, the Illinois Child Care Act, and the Illinois Lawn Care Products Application and Notice Act require prior notification to occupants when pesticides are used. All applicable rules and regulations regarding notification will be adhered to.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use and safe storage during the year. Pesticides will be stored and disposed of in accordance with the US EPA-registered label directions and state regulations. Pesticides must be stored in an appropriate, secure site with proper ventilation and not accessible to students or unauthorized personnel.

Pesticide Applicators

Pesticide applicators must be trained in the principles and practices of IPM and the use of pesticides approved by this school district/school/day care center, and must follow all regulations and label directions. The school district/school/day care center will follow all applicable regulations requiring applicator licensing and all personnel will be licensed appropriately before being required to administer a pesticide.

*Precautionary statements are required on all pesticide labels. Signal words on each label indicate the level of acute toxicity of the pesticide product (see below). The chronic toxicity is not indicated on the label. Every label bears the child hazard warning: "Keep Out Of Reach Of Children."

DANGER - A taste to a teaspoonful taken by mouth could kill an average-sized adult.

WARNING - A teaspoonful to an ounce taken by mouth could kill an average-sized adult.

CAUTION - An ounce to more than a pint taken by mouth could kill an average-sized adult.

Sample Policy Statement

Example #2

Taken from Integrated Pest Management, Children's Environmental Health

Pest Management Policy for School and Child Care Facilities

Policy Statement The management of this School/Child Care Facility is committed to providing a safe environment for the children in our care. We seek to prevent students/children from being exposed to pests and pesticides, and therefore we have adopted the Integrated Pest Management (IPM) approach to pest control. The IPM approach minimizes the exposure of students/children and staff to pesticides, and includes a variety of non-chemical and chemical methods to prevent and eradicate pests. While pesticides may be used to remediate infestations of pests (such as insects, weeds, and rodents) that may be found in the facility and its surrounding grounds, only the least toxic products will be considered and combined with non-chemical methods.

Definition of Integrated Pest Management:

7 An ecologically-based management strategy that provides long-term solutions to pest problems with minimum impact on human health and the environment. Programs are heavily reliant upon pest prevention through good sanitation and mechanical means such as pest-proofing buildings.

∧ Head lice policy: pesticide applications to the facility for head lice are ineffective, and thus are prohibited by this policy. An informational fact sheet on head lice will be provided for staff, teachers, and parents. Non-chemical control options (combs, etc.) are indicated in the literature.

Commitments This policy covers all indoor and outdoor areas used by the school/child care community. **This facility recognizes that pest management is best accomplished through partnership. Therefore, we are committed to accepting the advice of the Pest Management experts and conducting maintenance and remediation in a timely manner.**

1. Facilities should designate a contact person to answer questions from parents and staff about IPM and this policy, and coordinate implementation of this policy with others, such as the landlord, pest management professionals, and grounds professionals.
2. Pest management remediation should be based on the results of regular inspections and monitoring. Pest management professionals partner as educators and diagnosticians, they are IPM experts not spray techs.

3. Pest management professionals visit the premises during operational hours and interact with building managers and inhabitants.
4. Pesticides should not be applied in a routine manner and should only be considered if an active pest infestation is confirmed.
5. Restrict pesticide products to those with an EPA “Caution” label or a specified “Green List” of allowable pesticides.
6. No one other than a certified pesticide applicator should make pesticide applications. Pest Management personnel whether contracted or on staff, should partner with school/child care facility staff and function as an educator and diagnostician of pest problems.
7. Provide new staff with orientation training on Integrated Pest Management.
8. Ensure that pesticides will not be applied when children are present at the facility. Toys and other items mouthed or handled by the children will be removed from the area before pesticides are applied. Children will not return to the treated area within two hours of a pesticide application or as specified on the pesticide label, whichever time is greater.
9. Inform parents and staff members in writing of the facility's pest control policy at enrollment and/or annually.
10. Provide at least three operational days but not more than 30 days advance notice of pesticide application to parents and staff except in emergencies where pests pose an immediate health threat to children or staff (e.g. honey bees).
11. In the event of an emergency where pests pose an immediate health threat to children and staff (e.g. bees) and pesticides are applied, ensure that children will not return to the treated area within two hours of a pesticide application or as specified on the pesticide label, whichever time is greater.
12. Ensure that pesticide MSDS and labels are available and up-to-date. They must be located in a known and accessible place.
13. Notify parents and staff as soon as possible when advance notice is not provided and include an explanation of the emergency, the reason for the late notice and the name of pesticide applied.
14. Make accessible, upon request, all records of pesticide applications and advance notices, pest sighting logs, and monitoring logs for the minimum time period required by state law.

Exemptions This policy does not apply to the following exempted uses of products:

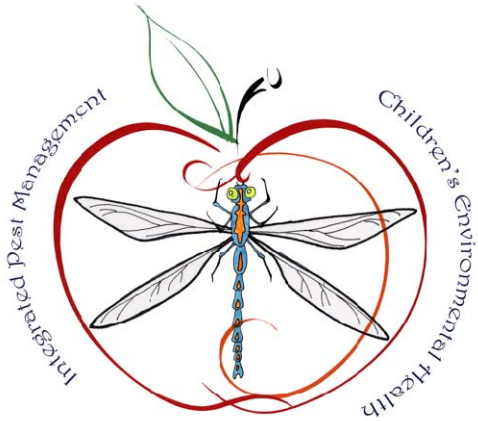
1) Germicides, disinfectants, bactericides, sanitizing agents, water purifiers and swimming pool

chemicals used in normal cleaning activities;

2) Personal insect repellents applied to the person with parental consent;

3) Manufactured enclosed pesticides and crack and crevice application of gel baits, where students/children do not have access to the bait;

4) The school/child care facility must comply with all usage directions specified by the label. This is a minimum requirement.



Sample Policy Statement

Example #3

Taken from U.S. EPA's IPM For Schools

(Doc #909-B-97-001) Appendix C

Appendix C
Developing an IPM Policy Statement for School Pest Management

A clear policy statement is needed to develop agreement about how pest control will be performed. The sample IPM policy included here does not exclude the use of a pesticide, but places all pesticide use within a context where such use will be minimized. A policy statement for school pest management should state the intent of the school administration to implement an IPM program and should briefly provide guidance on what specifically is expected. The sample policy statement below can be adapted and modified to fit your own situation. This model has been used by a wide variety of institutions and school districts as a way to resolve conflicts and redirect pest control efforts toward least hazardous practices.

Sample School Pest Management Policy Statement

Structural and landscape pests can pose significant problems to people, property, and the environment; however, the pesticides used to solve these problems carry their own risks. It is therefore the policy of this School District to use Integrated Pest Management (IPM) programs and procedures for control of structural and landscape pests.

Pests

Pests are living organisms (animals, plants, or microorganisms) that interfere with human purposes for the school site. Strategies for managing pest populations will be influenced by the pest species and the degree to which that population poses a threat to people, property, or the environment.

Pest Management

Pests will be managed to

- reduce any potential human health hazard or to protect against a significant threat to public safety
- prevent loss or damage to school resources, structures or property
- prevent pests from spreading in the community, or to plant and animal populations beyond the school site
- enhance the quality of life for students, staff, and others

Pest management strategies must be included in an approved pest management plan for the site.

Integrated Pest Management Procedures

IPM procedures will determine when to control pests, and whether to use physical, horticultural, or biological means. Chemical controls are used as a last resort. IPM practitioners depend on current, comprehensive information on the pest and its environment, and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage. These principles are implemented by the most economical means and with the least possible hazard to people, property, and the environment.

It is the policy of this School District to utilize IPM principles to manage pest populations adequately. While the goal of this IPM program is to reduce and ultimately eliminate use of toxic chemicals, toxic chemicals may become necessary in certain situations. The choice of using a pesticide will be based on a review of all other available options and a determination that these options are unacceptable or are infeasible, alone or in combination. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents. The full range of alternatives, including no action, will be considered.

When it is determined that a pesticide must be used in order to prevent pest levels from exceeding action thresholds, the least-hazardous (see Box A) material will be chosen. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), School District policies and procedures, Environmental Protection Agency regulations in 40 CFR, Occupational Safety and Health Administration regulations, and state and local regulations.

Education

Staff, students, administrative personnel, custodial staff, pest managers, and the public will be educated about potential school pest problems and the integrated pest management policies and procedures to be used to achieve the desired pest management objectives.

Record Keeping

Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments. Records must be current and accurate if IPM is to work. Records of pesticide use shall be maintained on site to meet the requirements of the state regulatory agency and School Board, and records will also document any non-toxic treatment methods being used. The objective is to create records from which programs and practices can be evaluated in order to improve the system and to eliminate ineffective and unnecessary treatments.

Notification

This School District takes the responsibility to notify students' parents or guardians and the school staff of upcoming treatments which will involve a pesticide. Notices will be posted in designated areas at school and sent home with students.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use during the year. Pesticides will be stored and disposed of in accordance with the EPA-registered label directions and State or Local regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel. A cabinet in a non-student area with a locked and labeled door is advised. The door label should include a skull and crossbones, Mr. Ugh, or other visual signals for non-English reading adults or children.

Pesticide Applicators

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by this School District, and they must follow regulations and label precautions. Applicators must be certified and comply with this School District IPM Policy and Pest Management Plan. Under no circumstances should applications be made while school or school activities are in progress.

Box A
Cautionary Labeling for Pesticides

Law requires that precautionary statements and signal words be included on all pesticide labels. The signal words (see below) indicate the level of acute (immediate) toxicity of the pesticide to humans. The chronic (long-term) toxicity is not indicated on the label. Note that chronic toxicity may be important for materials used frequently or extensively, or used in areas where children may receive regular whole-body exposure (for example, lawns on which young children play, sit, and lie). Chronic toxicity information must be obtained from scientific papers that are published in scientific journals. Every label bears the child hazard warning "Keep Out of Reach of Children."

Signal Words

If none of these warnings is provided do not use the pesticide.

DANGER-A taste to a teaspoonful taken by mouth could kill an average-sized adult.

WARNING-A teaspoonful to an ounce taken by mouth could kill an average-sized adult.

CAUTION-An ounce to over a pint taken by mouth could kill an average-sized adult.

Note that these warnings are expressed as amounts taken by mouth; however, most actual exposure is through skin and lungs. Thus, this system is not sufficient to guarantee safety; it is only one indicator. No materials with the DANGER indication should be used near children. It also follows that WARNING materials should be used only rarely on pests for which no CAUTION materials are registered. Whenever additional information is available about chronic toxicity it should be used to compare different materials to chose the least-toxic pesticides.

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