

# Hillsboro School District Integrated Pest Management Plan

Based on the OSU Model Plan by  
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Periodic updates will be posted at [www.ipmnet.org/tim](http://www.ipmnet.org/tim) as experience gained through implementation is used to improve this plan.

Sections highlighted in yellow are generic text that must be modified by the specific district or entity using this plan.

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## I. INTRODUCTION

Structural and landscape pests can pose significant problems in schools. 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 the Hillsboro 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 schools. For this reason, the Hillsboro School District School Board adopts this integrated pest management plan for use on the campuses of our 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.

### IPM Basics

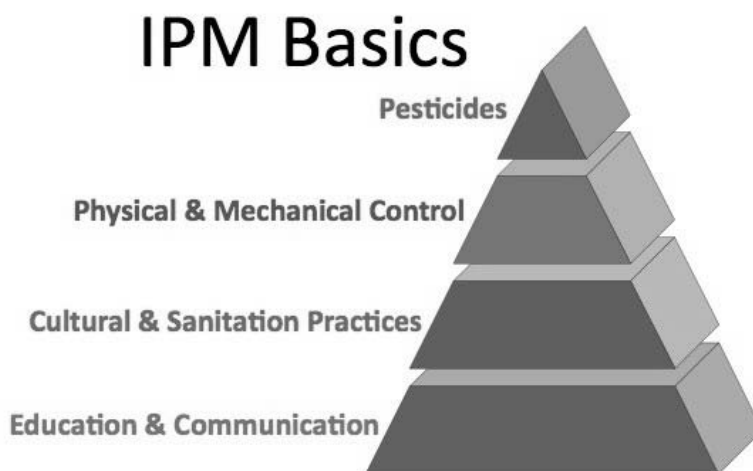
Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication 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, 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 control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here

therefore, 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:

- a) Protect the health and safety of students, staff and faculty;
- b) Protect the integrity of campus buildings and grounds;
- c) Maintain a productive learning environment; and
- d) 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, allows 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.

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, several steps must be taken before **any** “routine” applications are allowed:

- 1) Staff must be educated on sanitation, monitoring, and exclusion as the primary means to control the pest.
- 2) An acceptable pest population density level must be established.
- 3) The use of sanitation, structural remediation or habitat manipulation, or of mechanical or biological control methods must be incorporated into the management strategy of the pest.
- 4) Documentation that the above steps were ineffective.
- 5) The pesticide label must be read thoroughly to make sure the pesticide will be used in strict compliance with all label instructions.

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

ORS 634.720 states that the Plan Coordinator “must be an employee of the governed body, unit, school or entity unless the governing body delegates pest management duties to an independent contractor.”

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

##### **A. Attending not less than six hours of IPM training each year**

The training shall include at least a general review of IPM principles and the

requirements of ORS 634.700 – 634.750.

**B. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school's IPM plan;**

The IPM Plan Coordinator (or designee) will provide training as outlined in Section VII below.

**C. Overseeing pest prevention efforts;**

The Coordinator will work with custodians, teachers, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points.

**D. Assuring that the decision-making process for implementing IPM in the district (as outlined in section V) is followed;**

The Coordinator will continually assess and improve the pest monitoring / reporting / action protocol.

**E. Assuring that all notification, posting, and record-keeping requirements in section VI 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 Coordinator.

## **V. IPM DECISION-MAKING PROCESS**

### **A. Responsibilities of School District Employees**

#### ***1. IPM Plan Coordinator Responsibilities***

See Section IV above

#### ***2. Custodial Services Responsibilities***

Custodial Services staff are responsible for the following:

- 1) Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan Coordinator's instructions.
- 3) Keeping records of pest complaints using pest logs kept in the custodial office and kitchen.
- 4) Assuring floor under serving counters is kept free of food and drink debris.

- 5) Correcting pest conducive conditions when reported by teachers or noticed by custodian when this can be done in a short time. (10 to 15 minutes)
- 6) Recording his/her pest management actions in the pest log.
- 7) Reporting pest problems or pest conducive conditions that he/she cannot resolve in less than 15 minutes to the maintenance department in a written format.
- 8) Reporting teachers to the IPM Plan Coordinator who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.
- 9) Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.
- 10) Following up on issues found in annual inspection report as instructed by the IPM Plan Coordinator (IPM Plan Coordinator will determine which schools receive annual inspections based on pest and pesticide use history).

### ***3. Maintenance/Construction Responsibilities***

Staff involved in facilities maintenance and construction are responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

- 1) Receiving training from the IPM Plan Coordinator (or designee of the Coordinator) on the basic principles of IPM, sealing pest entry points, and sanitation during construction projects.
- 2) Continually monitoring for pest conducive conditions during daily work, and correcting or reporting such conditions in a written format.
- 3) Working with the Coordinator to develop a protocol and priority list with deadlines for correcting pest conducive conditions.
- 4) Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Plan Coordinator has the authority to halt construction projects if these protocols and provisions are not being met.

### ***4. Grounds Department Responsibilities***

Grounds crews are responsible for:

- 1) Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Keeping vegetation (including tree branches and bushes) at least two feet from building surfaces.



- 3) Proper mulching in landscaped areas to reduce weeds.
- 4) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds. (for additional information, see OSU turf management publications available free online at <http://extension.oregonstate.edu/catalog/>).
- 5) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI.

### **5. Kitchen Staff Responsibilities**

Kitchen staff are responsible for:

- 1) Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Assuring floor under serving counters is kept free of food and drink debris.
- 3) Promptly emptying and removing corrugated cardboard materials.
- 4) Keeping exterior kitchen doors closed.
- 5) Reporting pest conducive conditions that require maintenance to proper staff using the pest log or other written format.
- 6) Participating in any inspections conducted by custodian or IPM Plan Coordinator.
- 7) Checking sticky trap monitors regularly for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings to custodian and marking them in pest log.

### **6. School Faculty Responsibilities**

School faculty are responsible for:

- 1) Attending annual basic IPM training provided by the IPM Plan Coordinator (or designee).
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students clean up after themselves when food or drink is consumed in the classroom.
- 4) Reporting pests and pest conducive conditions to the custodian or proper staff.
- 5) Following first steps of protocol for ant management before notifying the

custodian.

## **7. School Principal Responsibilities**

The School Principal is responsible for:

- 1) Scheduling time for teachers to receive annual training provided by the IPM Plan Coordinator (or designee).
- 2) Attending annual IPM training for teachers.
- 3) Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Plan Coordinator's instructions.
- 4) Assuring that all faculty, administrators, staff, adult students and parents receive the annual notice (provided by the IPM Plan Coordinator) of potential pesticide products that could be used on school property as per Section VI.
- 5) Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents.
- 6) Assuring that all staff fulfill their role as outlined in the districts IPM plan.

## **8. All Staff Responsibilities**

All District Staff are responsible for reporting any and all observed acts of non-compliance to the provisions of the Hillsboro School Districts IPM plan to the Plan Coordinator, or their school Principal.

## **B. Monitoring - Monitoring Devices - Reporting - Action Protocol**

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of the Hillsboro School Districts 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 and 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. Three levels of monitoring**

There are three levels of monitoring:

- 1) Casual observing/looking with no record keeping.
- 2) Casual observing/looking with written observations.
- 3) Careful inspections with written observations.

#### Level 1 monitoring (all staff)

While not as useful as level 2, it is, and should be considered as, a pre cursor to level 2 monitoring.

#### Level 2 monitoring (all staff)

All staff will be trained to improve their “casual observing/looking” to level 2, and to report any pests and pest-conducive conditions they observe. Level 2 monitoring is regularly conducted by school administrators, custodians, maintenance/construction personnel, kitchen staff, school nurses, etc. in conjunction with their daily activities. Custodial, maintenance, and kitchen staff are expected to set and/or check sticky monitoring traps as per the district’s IPM plan.

#### Level 3 monitoring (Coordinator, Custodial staff and Maintenance staff)

The IPM Plan Coordinator (or designee) and Custodians and or Maintenance staff will periodically conduct monitoring at level 3. These inspections will include, but not be limited to;

- Pest conducive conditions inside and outside the building.
- The level of sanitation inside and outside of the building.
- The amount of pest damage and the number and location of pest signs.
- Human behaviors that enhance pest conducive conditions.
- Their own management and maintenance activities and their effects on the pest population.

#### Level 3 monitoring (Grounds staff)

Grounds staff will in conjunction with their daily activities continually monitor and inspect Turf and Landscape. This monitoring and inspection will include but not be limited to;

- The overall condition of the plants. (vigor and appearance)
- The amount and type of plant damage.
- Proper drainage.
- Their own management and maintenance activities and their effects on plants and the pest population.

- Type and population or level of pests as well and their natural enemies.
- Human behaviors that affect the plants or pests, and may contribute to pest conducive conditions.
- Weather conditions with notation of conditions that would adversely affect plants or natural pest enemies.
- Soil testing for appropriate mineral and nutrient content at 3 to 4 year intervals.

## **2. *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 likely direction of travel, reproductive stage, and population density.

All staff will be made aware of the traps and their purpose so they don't disturb them. Custodians will be trained in and responsible for their proper placement, checking, and replacement as needed. Kitchen staff will be responsible for checking those in the kitchen area.

## **3. *Reporting (pests, signs of pests, and conducive conditions)***

When staff observe pests or pest conducive conditions they should note them in the pest log or report them to the custodian for him/her to record in the pest log.

## **4. *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, mice & rats, yellow jackets and bees, cornered nutria, raccoons, cats, dogs, opossums, skunks, and bed bugs.

When pests of concern or evidence of their presence are observed, staff should immediately tell the building custodian. The custodian must report this information to the IPM Plan Coordinator or Designee immediately.

## **5. *Action***

### ***a) Interior or Building Envelope***

Any items that maintenance/construction staff or custodial staff observe or see in the pest log that they can resolve in less than 15 minutes should be taken care of and this follow up action should be noted in the pest log.

Custodial staff will review Pest Logs daily. Any items he/she cannot resolve in a reasonable period of time should be marked in order of priority, and reported to maintenance if required.

Pest logs will be faxed to the IPM Plan Coordinator once per month for review. The Coordinator will determine further actions to be taken and when for any unresolved issues.

If the actions needed are not something the Coordinator can accomplish alone or with minimal assistance, the Coordinator will meet with maintenance / construction staff and / or the pest management professional to develop a protocol and priority list and issue work orders with deadlines for the resolution of any outstanding pest management issues.

The Coordinator will monitor the completion of the work order. If the work is not completed by the proposed deadline, the Coordinator will communicate with the correct personnel to determine the cause and establish a revised deadline. Upon completion of the work, the Coordinator and the school custodian will be notified.

The Coordinator or designee will keep records of time and money spent to manage the pest, including copies of original receipts.

### **Ant Management Protocol;**

| When staff observe a small number of ants (e.g. less than 10) they must:

- 1 Kill the ants with a paper towel or similar
- 2 Remove any food or liquid the ants were eating
- 3 Wipe down the area with soapy water or disinfectant to remove pheromone trails

If the ants come back or there are more than a small number of them, staff will report this to the custodian.

| The custodian will:

- 1 Spend two minutes trying to find out where the ants are coming from
- 2 Vacuum up the ants and any food debris nearby (vacuuming up a tablespoon of cornstarch will kill most of the ants in the vacuum bag)
- 3 Seal up the crack or hole where the ants were coming from if this can be done in less than 15 minutes
- 4 Wipe down the area with soapy water or disinfectant to remove pheromone trails
- 5 Note the above in the pest log

To avoid a proliferation of small ants and/or unnecessary applications of pesticides, the

| routine use of ant baits is not permitted without first:

- 1 Educating staff on sanitation, monitoring, and exclusion as the primary means to control the ants.
- 2 Establishing an acceptable pest population density
- 3 Improving sanitation and structural remediation

For more detailed information on small ants, see Appendix 1a.

#### **b) Grounds**

When pests on the grounds reach the threshold established by the IPM Coordinator, action will be taken as per the matrix in Appendix 1

### **6. Acceptable Thresholds (pest population density levels)**

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 0.

Acceptable thresholds for other pests will be determined by the IPM Plan Coordinator, and is listed in appendix 1.

### **C. Inspections**

#### **1) Routine Inspections**

The IPM Plan Coordinator will conduct routine inspections of different schools throughout the year. A schedule of these inspections will be determined by the Coordinator and made available to the scheduled site not less than 1 week in advance. Site custodians are required to accompany the Coordinator during the inspections. The inspections will typically last one to two hours, focus on compliance with this plan and include at a minimum an inspection of the kitchen, staff room, and any other areas of concern. After each routine inspection the Coordinator will write a brief report on their findings with recommendations. The report will be submitted to the school principal and custodian.

#### **2) Annual Inspections**

The IPM Plan Coordinator will conduct annual inspections at individual schools. Site custodians are required to assist the Coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the Annual IPM Inspection Form (see Appendix 2) to guide the inspections. The specific schools to be inspected will be determined by the IPM Plan Coordinator and based on a review of the annual number of pest problems and pesticide applications reported in the Annual IPM Report and Annual Report of Pesticide Applications.

#### **D. Pest Emergencies (see also Section VII. B. below)**

When the IPM Plan 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, faculty members 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 or bees swarming in areas frequented by children, a nutria in an area frequented by children, mice or rats observed in occupied areas of a school building.

#### **E. Annual IPM Report (completed by IPM Plan Coordinator)**

In January of each year, the IPM Plan Coordinator will provide the School Board and the OSU School IPM Program Coordinator an annual IPM report. The report will include a summary of data gathered from Pest Logs, 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. See Appendix 9 for a template for the annual IPM report.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will also be incorporated into the annual report of pesticide applications (see section VII. D)

### **VI. REQUIRED TRAINING/EDUCATION**

ORS 634.700 (3) (i) require 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 Training**

ORS 634.720 (2) requires that the IPM Plan Coordinator “shall complete not less than six hours of training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 to 634.750.”

Content should include health and economic issues associated with pests in schools, exclusion practices, pest identification and biology for common pests, common challenges with monitoring-reporting-action protocols, proper use of sticky monitoring traps for insects, and hands-on training on proper inspection techniques.

Contact your Education Service District or the OSU School IPM Program for information on OSU-approved training courses.

### **B. Training for Custodial Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and their responsibilities as outlined in Section V. A.

### **C. Training for Maintenance and Construction Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train maintenance staff 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 as outlined in Section V. A.

### **D. Training for Grounds Staff**

The head of grounds staff (or designee) will train grounds staff at least once per year. Each year before the training, the head of grounds staff will meet with the IPM Plan Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The annual training will review this IPM Plan (especially grounds department responsibilities outlined in Section V.A.) and data from the annual report related to pesticide applications by grounds crew. It will also review the OSU turf management publications available free online at <http://extension.oregonstate.edu/catalog/>), and the matrices in Appendix 1-g. Grounds staff will also be trained in basic monitoring for common pests on grounds.

### **E. Training for Kitchen Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train kitchen staff at least once per year on the basic principles of IPM and their responsibilities as outlined in Section V. A.

### **F. Training for Faculty and Principal**

The IPM Plan Coordinator (or a designee of the Coordinator) will train faculty and principals at least once per year on the basic principles of IPM and their responsibilities as outlined in Section V. A. These trainings are arranged by the Coordinator with individual principals when openings in their school Faculty Meeting schedules permit.

### **G. Other Training**

Basic training on the principals of IPM and the main points of this IPM Plan should also be provided to school nurses, administrative staff, superintendents, and students. Coaches who use athletic fields should be given an overview of basic monitoring and IPM practices for turf so they understand key pest problems to look out for and when to report them.

## **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. At the beginning of each school year, all faculty, administrators, staff, adult students and parents will be given a list of potential pesticide products that could be used in the event that non chemical pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be provided to all the above via e-mail as well as hard copy to adult students and parents.

#### **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 Plan Coordinator and at the office of the head custodian where the application takes place.*

No non-emergency pesticide applications may occur in or around a school while school is in session unless the IPM Plan 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 Plan 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 Plan Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application via the method most likely to reach the intended recipients 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 Plan Coordinator (or a designee of the Coordinator) 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 Plan Coordinator).

#### **B. Notification and Posting for Emergencies**

Important Notes:

- 1) *The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration.*

- 2) *If a pesticide is applied at a campus due to a pest emergency, the Plan Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest 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 an advanced pesticide application notice, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.

The IPM Plan 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.

### **C. Record Keeping of Pesticide Applications**

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Coordinator.

- A copy of the label
- A copy of the MSDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator’s license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The dates and times for the placement and removal of warning signs
- Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices

The above records must be kept on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Coordinator, for at least four years following the application date.

### **D. Annual Report of Pesticide Applications**

In January of each year, the IPM Plan Coordinator will provide the School Board and

the OSU School IPM Program Coordinator an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

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

## **VII. 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 governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest management plan. The governing body may include any product on the list 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 our website at XXXXXXXX (under development)

The process for creating and updating the Hillsboro School District’s approved list is available at this link XXXXXXXX (under development)

## LIST OF APPENDICES

**Note, All Appendices for the HSD Plan are still under development.**

Appendix 1 Pest Management for Specific Pests *(SOME STILL TO COME)*

(Lifecycle, What-Where-How they Eat/Drink/Shelter, Monitoring, Prevention, Threshold Levels, Management Options, Evaluation of Options Chosen for Specific Pests)

a-Ants (Small Ants)

b-Ants (Carpenter Ants)

c-Bats

d-Bed Bugs

e-Nesting birds (starlings, sparrows, swallows, pigeons)

f-Geese

g-Grounds Pests

h-Mice (House Mouse)

i-Rats (Norway Rat)

j-Yellow Jackets and European Paper Wasps

Appendix 2 Annual Inspection Form

Appendix 3 Pest Logs

Appendix 4 Outlines of Training for Custodians, Maintenance/Construction Staff, Grounds Staff, Kitchen Staff, and Faculty

Appendix 5 Template for annual fall notification of potential pesticides to be used *(STILL TO COME)*

Appendix 6 Pesticide Application Notification Form

Appendix 7 Pesticide Application Posting Sign

Appendix 8 Pesticide Application Recordkeeping Form

Appendix 9 Template for Annual IPM Report

Appendix 10 Template for Annual Pesticide Application Report *(STILL TO COME)*

Appendix 11 Hiring an Outside Contractor

-In-House vs. Contractor

-Bid Specifications – Important Things to Remember

-Sample Bid

Appendix 12 References and Source Materials