

Model Integrated Pest Management Policy for Elmwood Community Unit School District

Pesticides are designed to kill living organisms. As such, they pose risks to human and environmental health, and special risks to children. Because the health and safety of students and staff is our first priority, and a prerequisite to learning, it is the goal of this School District to minimize pesticide use and thus exposure to children, parents, and staff.

To accomplish this goal, this School District will adopt a Least Toxic Integrated Pest Management approach to pest prevention and control in all school buildings and on school grounds. The District will utilize physical, mechanical, cultural, biological, and educational tactics as primary controls. Least-toxic chemical controls are used as a last resort. Pests will be controlled to maintain the integrity of school buildings and grounds, to protect the health and safety of children and staff, and to maintain a productive learning environment. Pesticides will not be used to control pests for aesthetic reasons alone. Contractors working in district buildings and grounds are required to adhere to all provisions of this policy.

Illinois law requires schools to use integrated pest management indoors. State law also requires schools to provide notification to parents, guardians and school employees two business days prior to the application of pesticides inside school buildings or on school grounds. Notification can be provided through written notices to parents and staff who register to be notified or through written notification to all parents and staff in newsletters, bulletins, calendars or other correspondence currently published by the school district. Antimicrobial agents such as sanitizers and insecticide and rodenticide baits are exempt from notification requirements.

The United State Environmental Protection Agency (USEPA) and the National PTA encourage Integrated Pest Management in schools.

Pest Management

1. Least Toxic Integrated Pest Management (IPM) attempts to prevent pest problems whenever possible. IPM includes monitoring, regular pest inspections, sanitation and pest proofing measures, or modification of environmental conditions leading to pest problems.
2. The District will establish pest tolerance thresholds to indicate pest population levels at which control measures will be undertaken. Thresholds will not be set based on aesthetic criteria alone. Control measures will not be undertaken if pest damage or populations are below threshold levels. In such cases, schools will use preventive measures such as improved sanitation, clutter reduction and exclusion of pests.
3. When pests exceed tolerance thresholds, non-chemical pest control measures (e.g., sanitation, screening, physical barriers, vacuuming, mulching, irrigation, fertilization, manual weeding, insect nest removal, pest-resistant plant selection) will be preferred.
4. Pesticides will be used only as a last resort, when other pest prevention and non-chemical control measures have failed to reduce pests below tolerance thresholds. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents. When a pesticide

must be used, the smallest amount of the least-toxic product that will meet pest management goals will be used.

5. No routinely scheduled (e.g., seasonal, monthly or weekly) pesticide applications will be made. No pesticide fogging or space spraying will be done. Insecticides will be used only in containerized baits, or for spot treatments targeted to insect nests or problem areas where a minimal amount of material is used. Rodent baits shall not be used unless in childproof bait boxes. Bait boxes shall be inaccessible to children.
6. Pesticide Use and Selection: To ensure the safety of students and staff, the District will use the following criteria to ensure that the least hazardous pesticide and/or the least hazardous method of control be utilized:
 - a. The District will not use any pesticide classified as highly acutely toxic by the U.S. EPA. This includes Hazard Category I and II, signal words DANGER and WARNING.
 - b. The District shall not use any pesticide unless all ingredients in the product have been evaluated by the U.S. EPA and found to include no possible, probable, known, or likely human carcinogens; no reproductive toxicants; no known, probable or suspected endocrine disruptors; and no nervous system toxicants (either cholinesterase inhibitors or listed as neurotoxins by the Toxics Release Inventory.)
 - c. No restricted use pesticides will be used.
 - d. Properly applied gel bait or tamper-resistant containerized bait can be exempted from 6a, 6b, and 6c if it represents the least hazardous treatment option.
7. Pesticide Applications: The School Board or its representative must approve Pesticide applications in advance; antimicrobial agents and insecticide and rodenticide baits, because they pose less risk to human health, are exempt from School Board approval. Pesticides will be applied by certified pesticide applicators only when no one is present in the building or the grounds of the school to be treated. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), US EPA regulations, Occupational Safety and Health Administration regulations, and state and local regulations.

The reference to the various statutes that apply to pesticide application is simply stating that it is the policy of the school board that all current laws regarding pesticide application will be obeyed.

8. Record keeping and public access to records: The School District will keep records of all pest control measures, pesticides used, and amounts and locations of treatments. These records shall be made available upon request to school staff and the general public during normal school operating hours and shall be kept for at least three years.
9. Parental and staff notification: The School District will notify all parents and staff at least 2 business days prior to any pesticide applications in school buildings or on school grounds. The District may create a notification registry by providing parents an opportunity to register for notification annually as part of the school registration process. Antimicrobial agents and insecticide and rodenticide baits are exempt from notification requirements.

10. Contractors: The School District will provide written notification to all current district pest control, construction and landscape contractors of the need to adhere to the District's IPM policy in any pest control, planning, new construction, repair or maintenance work done for the District. Any pest control contractors hired will be required to inspect for conditions conducive to pest problems and develop appropriate prevention measures, not simply apply control materials. Pest control contractors will be expected to provide recommendations for structural improvements or repairs and housekeeping and sanitation measures required to reduce or prevent recurrence of pest problems.
11. IPM Coordinator: The district shall appoint an IPM Coordinator who shall have primary responsibility for ensuring that this IPM policy is carried out. The IPM Coordinator will oversee custodial, building and grounds, and maintenance staff to ensure implementation of pest prevention measures; manage pest control contractors and staff engaged in monitoring and control of pest problems; communicate with principals and district administration to carry out posting and notification, recordkeeping, and education provisions in this policy; and present an annual report to the School Board evaluating the progress of the IPM program.
12. Education: Parents and staff will be informed annually about the District's IPM policy.

Cooperation from all members of the school community is important to the success of an IPM program. For example, educating teachers and students about appropriate storage and disposal of food can significantly reduce pest problems in lockers, classrooms or teachers' lounges.

13. Posting: Signs will be posted on facility doors least 2 business days in advance of pesticide use, and at the time of application. Outdoor applications will be cordoned off and flagged. Signs shall remain in place for one week after pesticide application.

