

**WOODBINE ELEMENTARY SCHOOL  
INTEGRATED PEST MANAGEMENT POLICY  
& PLAN**



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## **TABLE OF CONTENTS**

- 1. GENERAL SCHOOL INFORMATION**
- 2. INTEGRATED PEST MANAGEMENT STATEMENT**
- 3. SCHOOL IPM POLICY**
- 4. SCHOOL IPM PLAN GOALS**
- 5. ROLES, RESPONSIBILITIES AND TRAINING**
  - a. School Administration/School IPM Coordinator**
  - b. School IPM Coordinator/Assistant Coordinator**
  - c. Pest Management Professional (Staff or Contractor)**
  - d. School Nurse**
  - e. Kitchen Staff**
  - f. Maintenance Staff**
  - g. Staff, Teachers, and Students**
  - h. Parents or Guardians of all students enrolled in the school**
  - i. Vendors and Contractors**
- 6. PEST IDENTIFICATION: SITE ASSESSMENT & ONGOING MONITORING**
- 7. PEST PREVENTION AND CONTROL**
- 8. PESTICIDE USE: NOTIFICATION, POSTING AND RE-ENTRY**
- 9. RECORD KEEPING AND EVALUATION**

**1. GENERAL SCHOOL INFORMATION**

District: Woodbine Elementary School  
School IPM Coordinator: Carleena Supp, Superintendent  
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**2. INTEGRATED PEST MANAGEMENT STATEMENT**

Integrated Pest Management (IPM) on school property is a long term approach at maintaining facilities and landscapes that minimizes the risks to people and the environment. Woodbine Elementary School will use: site assessment, monitoring and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective pesticides when needed. Educational strategies will be used to enhance pest prevention, and to build support for the IPM program.

**3. WOODBINE BOARD OF EDUCATION POLICY 3575: INTEGRATED PEST MANAGEMENT**

**INTEGRATED PEST MANAGEMENT**

The New Jersey School Integrated Pest Management Act of 2002 requires schools to implement a school integrated pest management policy. As per this policy, the Board of Education directs the Superintendent of Schools to implement Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. In addition, the Board of Education shall adopt and maintain an IPM plan developed by the Superintendent of Schools/designee as part of this policy.

**Definition**

For the purposes of this policy, Integrated Pest Management shall be defined as a sustainable approach to managing pests by using all appropriate technology and management practices in a way that minimizes health, environmental, and economic risks. IPM includes, but is not limited to, monitoring pest populations, consumer education, and when needed, cultivation practices, sanitation, solid waste management, structural maintenance, physical, mechanical, biological and chemical controls.

**Integrated Pest Management Procedures**

Implementation of IPM procedures will determine when to control pests and whether to use mechanical, physical, cultural, biological or chemical methods. Applying IPM principles prevents unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment.

In preparing the IPM, the Superintendent of Schools will consider the full range of management options, including no action at all. Non-pesticide pest management methods are to be used whenever possible. The choice of using a pesticide shall be based on a review of all other available options and a determination that these options are not effective or not reasonable. When it is determined that a pesticide must be used, low impact pesticides and methods are preferred and shall be considered for use first.

**Development of IPM Plans**

The school IPM plan is a blueprint of how the school system will manage pests through IPM methods. The IPM plan states the district's goals regarding the management of pests and the use of pesticides. It reflects the school's site-specific needs. The IPM plan shall provide a description of how each component of the school IPM policy will be implemented at the school. The Superintendent of Schools shall be responsible for the development of the IPM plan for the school.

**IPM Coordinator**

The Superintendent of Schools shall designate an integrated pest management coordinator, who is responsible for the implementation of the school integrated pest management policy. The Board of Education shall approve the selection of the named IPM Coordinator upon recommendation of the Superintendent of Schools.

**Education /Training**

All school personnel will be educated about potential pest problems and IPM methods used to achieve the pest management objectives.

The IPM Coordinator, other school staff and pesticide applicators involved with implementation of the school IPM policy will be trained in appropriate components of IPM as it pertains to the school environment.

Students, parents/guardians will be provided information on this policy and instructed on how they can contribute to the success of the IPM program.

**Record keeping**

Records of pesticide use shall be maintained on site to meet the requirements of the state regulatory agency and the Board of Education.

Records shall also include, but are not limited to, pest surveillance data sheets and other non- pesticide pest management methods and practices utilized.

**Notification/Posting**

The Superintendent of Schools, under the direction of the Board of Education, is responsible for timely notification to students' parents or guardians and the school staff of pesticide treatments pursuant to the School IPM Act.

**Re-entry**

Re-entry to a pesticide treated area shall conform to the requirements of the School IPM Act.

**Pesticide applicators**

The IPM coordinator shall ensure that applicators follow state regulations, including licensing requirements and label precautions, and must comply with all components

of the School IPM Policy.

### **Evaluation**

Annually, the Superintendent of Schools will report to the Board of Education on the effectiveness of the IPM plan and make recommendations for improvement as needed.

The Board of Education directs the Superintendent of Schools to develop regulations/procedures for the implementation of this policy.

### **Authorizing Regulator References**

The School Integrated Pest Management Act of 2002  
N.J.A.C. Title 7 Chapter 30 Subchapters 1-12  
Pesticide Control Act of 1971

### **Legal**

N.J.S.A. 13 1F-19 et seq: School Integrated Pest Management Act  
N.J.S.A. 18A 17-49: Definitions relative to public school facilities  
N.J.S.A. 18A 18A-1: Public School Contracts Law  
N.J.S.A. 18A 18A-37: Award of purchases, contracts or agreements.  
N.J.S.A. 18A 22-8: Contents of budget; format.  
N.J.S.A. 34 5A-1 et seq: Worker and Community Right to Know Act  
N.J.S.A. 34 6A-25 et seq: New Jersey Public Employees' Occupational Safety and Health Act  
N.J.A.C. 5 23-1.1 et seq. Uniform Construction Code  
N.J.A.C. 6A 23A-1 et seq. Accountability regulations  
N.J.A.C. 6A 23A-6.9 Facilities maintenance and repair scheduling and accounting  
N.J.A.C. 6A 26-12.1 Facilities maintenance requirements  
N.J.A.C. 6A 26-12.2 Policies and procedures for school facility operation  
N.J.A.C. 6A 30-1.1 Purpose and scope  
N.J.A.C. 7 30-13.1 et seq. Integrated Pest Management  
20 U.S.C. 4071 - 4074 Equal Access Act

## **4. SCHOOL IPM PLAN GOALS**

- A. The roles, responsibilities and training of all members of the school community (school administration, school IPM Coordinator, Pest Management Professional, School Nurse, Kitchen Staff, maintenance staff, custodial staff, teachers, students, parents and/or guardians of all students enrolled in the school and vendors/contractors) regarding integrated pest management (IPM) at the school are clearly defined.
- B. Pest Identification: initially, define indoors and outdoor pests for the school by historical account and/or by direct monitoring establish monitoring establishes monitoring types and schedules and record keeping.
- C. Pest prevention and control to maintain a healthy school environment: Outline non-chemical controls that will be routinely practiced at the school. Establish threshold levels for all anticipated pests. Define prescribed use of low impact versus non low impact pesticides for identified pests. Maintain a record of all pesticide applications.
- D. Maintain IPM records and make them available for public inspection. Issue annual notice of school IPM program status. Establish pre-notification procedures for non-low impact pesticide use. Adapt notification procedures for emergency use of non-low impact pesticides. Establish pushing procedures for areas indoors and out that were treated with pesticides.
- E. Evaluate and revise the school IPM plan annually.

## **5. SCHOOL IPM ROLES, RESPONSIBILITIES, & TRAINING**

For an IPM program to be successful, all members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities and training for this school regarding pest management are outlined below:

### **A. School Administrators:** Specific duties of New Jersey School Administrators required by the school IPM Act:

1. Adapt and implement a school IPM policy for the school property by June 12, 2004.
2. Adapt and implement a school IPM for the school property.
3. Implement IPM procedures to control pests and minimize exposure of children, faculty and staff to pesticides.
4. Designation of a school IPM Coordinator. The IPM coordinator should be someone who is familiar with the school buildings and grounds, such as the Facilities Supervisor.

This IPM Act does not intend for the IPM coordinator and the pesticide applicator servicing the school to be one in the same; however, there is nothing in the statute that prohibits the school from employing an outside pesticide contractor of consultant in this capacity other duties required by law of the school administration are listed below (with the corresponding citation of the section of the Act). Delegation of any of these will be incorporated into the role and responsibilities of the individual (such as the IPM coordinator) designated.

1. Maintenance of records of pesticide application; providing required policy notification (C.13:1F-24)
2. Permitting the use of certain pesticides; providing required notification (C.13:1F-25)
3. Posting of sign prior to use of certain pesticides (C.13:1F-26)
4. Notification of emergency use of certain pesticides; notice requirements (C.13:1F-28)

For contracted services the school district will develop bid specifications, contracts and contact addendums in accordance with School IPM Policy and Plan.

#### **B. School IPM Coordinator:**

The School IPM coordinator, by law, is jointly responsible with the school administration---for the implementation of this school IPM plan.

**Role:** The IPM coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration. The school IPM coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all parties including custodial, building, food service, outside vendors, pest management professional, grounds staff, students, parents/guardians and teaching staff.

Specific duties of New Jersey School IPM coordinator required by law (C.13:1F-23) or regulation:

1. Maintain information about IPM Policy and Plan in place at the school.
2. Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, material safety data sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
3. Respond in inquiries and provide information to students, staff and parents or guardians regarding IPM.
4. Provide access to the above information for public review.
5. Provide training in IPM practices to the school community as described in the "Rolls, Responsibilities, and Training" section of the School IPM Plan.

Other coordinator duties, including those that may be delegated by the school administration:

- Distribute and train the school community in the use of the "Pest Sighting Report Forms" to be submitted when activity is noticed.
- Distribute and train school kitchen staff in the use of Pest sighting report forms.
- Compile all pests sighting report forms received in the "IPM Pest activity monitoring and control log". Also, write actions taken to remedy pest problems in the log.
- Maintain records of any pest monitoring, including traps in "IPM Pest Activity Monitoring and Control Log". • Maintain a prioritized list of pest management issues (including key pests and needed structural/landscape improvements and substandard sanitation practices) at the school.
- Consider all available options (including no action) with the schools' pest management professional prior to determining control to be used.
- Ensure that the Pest Management Professional makes accurate entries in the "Non Low Impact Pesticide Application Log" when these pesticides are applied at the school. Maintain these records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
- Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification and licensing.
- Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications. • Prepare and post signs as required by the "School IPM Plan" in areas where non low-impact pesticides are to be applied.
- Prepare and send out "Annual School IPM Program Notification Letter to Parents and Staff". • Work with administrators when contracting for pest control services to ensure that the bid specifications comply with the school IPM Policy and Plan.
- Serve as the point of contact for the contracted pest management services for their school.
- Provide a signature on the School Integrated Pest Act Compliance Certification forms when requested by pesticide applicators.
- Evaluates efficiency of IPM practices of school property on a monthly basis at a minimum
- Set up and moderate the annual evaluation of the "School IPM Plan." Revise school IPM plan accordingly.

#### **Training:**

The School IPM coordinator will receive NJDEP approved training that provides an overview of the principles of IPM, legal requirements and how to implement the IPM policy and plan at the school per rules adapted by the NJDEP in the fall of 2004.

#### **C. Pest Management Professional:**

All pesticide applications made on school property must be made by applicators certified and licensed to apply pesticides by the NJDEP PCP per the New Jersey Administrative Code Title 7, Chapter 30; Subchapters 1-12.

All applications at this school are made by a licensed Contractor Pest Management Professional. The contractor for pest management services at this school is **Alternative Exterminating.**

Our contact for the company is **609-465-9741**. The contractor will meet all specifications as contracted by the school.

Other specific duties of the Pest Management Professional in the School IPM Program

- Inspect school premises for presence of pests or signs of pest activities.
- Notify the IPM coordinator when pests or signs of pest activity are found.
- Make written recommendations to the school IPM Coordinator for corrective actions to be taken by the school to reduce potential pest populations.
- Recommend to the School IPM coordinator appropriate non-chemical procedures to correct pest problems. • When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
- Never apply a non-low impact pesticide without first consulting in advance with the IPM Coordinator to allow them to proceed with all required

notification and posting of area to be treated.

- Provide School IPM coordinator with MSDS of any pesticide that is applied on school property. • Provide application information as specified in the non low-impact "Pesticide Application Log" when they apply these pesticides at the school. This log is kept at each school.
- If a non low-impact pesticide is to be used, provide a school Integrated Pest Management Act Compliance Certification form to the school IPM coordinator for their signature ensuring all advance notification and posting has been performed as required.
- Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.

#### **D. School Nurse:**

The school nurse will consider potential pesticide exposure when evaluating a child's health. The school nurse should have access to material safety data sheets (MSDS) for any chemical used on school property and be aware of any children with asthma or chemical sensitivities.

Other Duties of the school nurse in the school IPM Program:

- Be aware of students with asthma or chemical sensitivities
- Maintain easy access to Poison Control Center hotline (1-800-222-1222)  
IN CASE ACUTE POISONING IS SUSPECTED.
- Monitor for head lice (a common problem for children between 3 to 10 years old).
- Educate parents and staff about preventing head lice from spreading when it occurs.

Training: In addition to required professional training:

- Be aware of public health pests of significance that may impact student health. Check the EPA's list of pests of significant public health importance at [http://www.epa.gov/apppmsd1/PR\\_Notices/pr2000-draft.htm](http://www.epa.gov/apppmsd1/PR_Notices/pr2000-draft.htm).
- Obtain copies of selected pesticide resources on poisoning which may include:
- Recognition and Management of Pesticide Poisonings, Roullet Reigart and James Roberts, 5<sup>th</sup>. Edition, U.S. Environmental Protection Agency, March 1999.

#### **E. Kitchen Staff:**

Food handling and preparation areas are among the most critical areas for pest management. Kitchen staff must keep all food areas free of crumbs and food residue after use.

Other duties of Kitchen Staff in the School IPM Program:

- Practice good sanitation of all kitchen and food service areas (clean all surfaces daily).
- Kitchen manager will inspect the kitchen monthly.
- Kitchen Manager will submit a "Pest Sighting Report" and Cafeteria/Kitchen Report to School IPM coordinator whenever pests are detected in the Kitchen and food service areas.
- Manage specific pest problem(s) as directed by the school IPM Coordinator.

Training:

- The NutriServe Food Service Director will be responsible for training the kitchen staff in proper sanitation procedures when hired and annually thereafter. The School IPM coordinator will train the Kitchen staff in pest detection and monitoring programs in place in the kitchen when hired and annually thereafter.

#### **F. Maintenance Staff:**

Maintenance staff maintains the cleanliness and takes care of the building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance school maintenance staff may make applications of pesticides that are over-the-counter disinfectants and antimicrobials such as Lysol and toilet-bowl cleaner and use "minimum risk" pesticides published by the federal EPA. If they need to apply any other pesticides they would need to meet all requirements of the Pest Management Professional.

Other duties of the Maintenance Staff in the School IPM Program:

- Provide a "Pest Sighting Report" to the school IPM coordinator whenever pests or signs of pest activity are discovered in the school building or on school grounds.
- Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways and poor sanitation practices.
- Manage specific pest issues as directed by the school IPM Coordinator. This will not include pesticide application unless you are a certified and a licensed pest Management Professional.

Training:

- The Facilities Supervisor will be responsible for training the indoor maintenance staff in proper sanitation schedules and procedures when hired and annually thereafter.
- The school IPM Coordinator must train the indoor maintenance staff in pest detection and monitoring programs and devices in place through the school when hired and annually thereafter.
- If landscaping or turf maintenance is required by their duties, grounds maintenance staff will be trained in accepted horticultural practices grounded in IPM.
- Apply any other pesticides; they would necessarily need to meet all the requirements of the Pest Management Professional.

#### **G. Staff, Teachers and Students:**

Duties of Staff, Teachers and Students in the School IPM Program:

- The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance.
- **Leave pest control and pest management to trained professionals**
- **DO NOT move sticky traps or other pest monitoring devices.**
- Report any evidence of pest activity to the **School IPM coordinator using the “Pest Sighting Form”**.

#### **Training:**

- School staff, teachers and students will be trained in their roles in the School’s pest management system by the School IPM Coordinator.
- Staff, teachers and students will be given a brief overview or updates by the School IPM coordinator on pest identification and the conditions that they may create that promote pests. This information will focus on pest reduction strategies connecting people’s behavior such as eating at desks, leaving crumbs on the floor, etc. to pest problems.
- Education will be focused to increase people’s willingness to share their environment with other organisms, so that people are less likely to insist on toxic treatments for harmless organisms.
- They will be instructed in how to log pest complaints using the “Pest sighting” form.

#### **H. Parents and/or Guardians of all students enrolled in the school:**

Duties of Parents/Guardians in the School IPM Program:

- Learn about IPM practices and follow them at home so that pests are not carried to school in lunch boxes, backpacks, clothing or the children’s hair.
- Make their children aware of their role in the School IPM Program at the school.  
Encourage children to lend a hand in cleaning up.  
Discourage children from keeping food in their lockers and desks.  
Be aware of the current pest management practices in their children’s school. Review the Annual School IPM Program Notification Letter to Parents and Staff as well as all notices of application of pesticides at the school. For questions or concerns, parents and/or guardians will contact the School IPM Coordinator.

#### **Training:**

- Principals in coordination with the IPM Coordinator will educate parents and guardians of all enrolled at the school about the School IPM Program.
- Pamphlets and fact sheets will be made available upon request.

#### **I. Vendors and Contractors:**

Duties of vendors and contractors in the School IPM Program to be prescribed in specific language in their bid specifications and contracts:

Contracts will specify regular maintenance services, cleaning under and behind machines during service visits and immediate correction of problems which may foster pests (e.g. breakage, leaks or excessive condensation from machinery)

### **6. PEST IDENTIFICATION: PRELIMINARY SITE ASSESSMENT & ONGOING MONITORING**

One of the key principles of School IPM is site assessment to precisely define the presence of pests and the site conditions that contribute to their presence. Indoors and outdoors pests will be defined for the school by historical account, interviews and by direct monitoring. [See appendix for the “Pest Problem Report” form for a listing of common school pests].

When the IPM program is implemented at the School, Pest Management Professional(s) and/or School IPM Coordinator will perform a thorough inspection of **All School Facilities** (indoors and outdoors) to identify pest activity and conditions that are contributing to any pest problems.

**Indoor site assessment:** Pest Management Professional and/or School IPM coordinator will compile and map on floor plans of the building.

- Areas that currently have pests or show signs of pest activity.
- Areas that historically have had pests as well as identifying when this occurs during the school year.
- Conditions or behaviors contributing to pest problems that can be corrected.
- If already in use, location of detection and monitoring devices and bait stations.
- Recommendations for sanitation, structural repairs and habitat modification.

**Outdoor site assessment:** Pest Management Professional and/or School IPM coordinator will indicate on maps of the school grounds:

- Locations of trees, shrubs and ornamentals.
- Assign and divide the landscape into management units (e.g. football field turf versus playground).
- Note Key plants and any pest problems.
- Horticultural recommendations

It is important that the pest(s) be accurately identified in order to gather information about the pest’s life cycle and habits. Identification is essential for selecting the combination of strategies which will be most effective as well as knowing when to implement them. If the Pest Management Professional is unable to identify the pest(s) the County Office of Rutgers Cooperative Extension (RCE) WILL BE CONSULTED AND SAMPLES WILL BE SUBMITTED FOR IDENTIFICATION IF NEEDED, <http://www.rce.rutgers.edu/mastergardeners/helplines.asp>.

### Ongoing Monitoring

Once a pest is correctly identified, monitoring methods and schedules, as well as controls will be determined based on its life cycle, food sources, habitat preferences and natural enemies.

Indoor pests will be monitored via direct inspection, sticky traps, pheromone baits, tracking powder, mechanical traps and glue boards as necessary. If baits or traps of any kind are used:

- Each bait station or trap is assigned an identification number.
- A map is prepared showing the location and number of each trap or bait placement.
- Each trap or bait station is marked with appropriate warning language.
- Traps will be checked by the Pest Management Professional weekly during the early stages of solving a serious pest infestation and then taper off to monthly, once the pest problem is under control.
- Captured rodent pests will be recorded and disposed of on a daily basis.

Outdoors landscape pests will be monitored via direct inspection:

- Landscape plants are scouted at least monthly during the growing season for conditions requiring action (e.g., damaged diseased, dead limbs; soil erosion/compaction; insect, disease, weed pests and damage).
- Scouting usually begins when plants put out new leaves in spring and ends when leaves fall in autumn.
- Plants with annually recurring pest problems will be scouted according to pest appearance timetables.

**Monitoring Records: The School IPM Coordinator or Pest Management Professional will maintain and keep records of any pest monitoring, including traps.**

## 7. PEST PREVENTION AND CONTROL

Whenever possible, the **School will** take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered.

IPM employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (harborage), and limit its access into and throughout the building and on school grounds will be employed as follows:

- Cultural control: e.g., improve sanitation; reduce clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- Physical control: e.g., pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.
- Mechanical control: e.g., trap rodents; till soil prior to planting to disrupt pest life cycles.
- Biological control: use of pest's natural enemies. e.g., conservation and/or augmentation of natural enemies of pests in the landscape; introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter and avoid using broad-spectrum chemicals that will inadvertently kill them.
- Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

Pesticides will be selected when other control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School Property unless both the pest has been identified and its presence verified. It is neither possible, nor desirable to completely exterminate every pest and potential pest from every population on school property.

The Woodbine School District will establish injury (also known as tolerance or threshold) levels and action thresholds for each individual pest species before making any chemical treatment. Action threshold for pesticide treatment is triggered if all other IPM tactics have not been able to control pest populations to an acceptable level. Appropriate injury levels will be set, and may take into consideration economic losses (e.g., amount of foodstuffs contaminated by pantry pests), health risk (e.g.; occurrence of disease-bearing pests), aesthetic evaluations (e.g. temporary present of ants), nuisance problems (e.g. stinging insects) and pest visibility [see appendix for a sample 'Indoors Pest Threshold'].

The New Jersey School IPM law defines 'low impact pesticides' and necessarily creates the distinction 'non low impact pesticides' for other pesticides not meeting their definition. The law and resulting model policy published by DEP make it clear that when pesticide use is needed, preference should be given to choosing a 'low impact pesticide', if possible. The School will give preference to choosing a low impact pesticide, as described below.

*A low impact pesticide is a pesticide that is considered to have relatively minimal risk as compared to pesticides in general. The New Jersey School IPM law specifically defines what a low impact pesticide is in two parts. The first part consists of a federal EPA list of pesticides that it considers to be minimal risk and thus do not require formal registration. These pesticides are listed in the federal code at 40 CFR § 152.25. (See <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/40cfr15225.pdf>). The second part consists of a list of pesticides ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risk. All pesticides must be used properly to reduce potential risk from their use.*

See the Rutgers Cooperative Extension School IPM website @ <http://www.pestmanagement.rutgers.edu/IPM?SchoolIPM/NJAct/lowimpact.htm> for information on low impact pesticides as it becomes available.



When it is determined that a non low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines per the law will be followed. Specifically, non low impact pesticides will be applied in a school building only when students are in another area of the building **AND** only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

Per the law, emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A “school pest emergency” is defined in the law as “an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member.” One example would be the presence of stinging insects such as ground hornets in an athletic field where events are scheduled. If a pest emergency exists, the school may use pesticides without the normal 72-hour notice to parents and staff and the posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and ‘spot’ treatments’ will be confined to those areas.

The School IPM coordinator and Pest Management Professional(s) will be scheduled to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the School IPM Coordinator. The IPM coordinator based on the professionals recommendations and following proper IPM procedures and guidelines will determine the appropriate action. They will consider all options, including no control, and look at pest activity levels versus thresholds.

They will consider EPA-defined criteria for selecting a treatment strategy:

1. Least hazardous to human health
2. Least disruptive of natural controls
3. Least toxic to non-target organisms
4. Most likely to be permanent
5. Easiest to carry out safely and effectively
6. Most cost-effective
7. Most site-appropriate

All controls that are actually implemented should be documented in the log.

## 8. **PESTICIDE USE: NOTIFICATION, POSTING, AND RE-ENTRY**

It is important to keep the community informed of the school’s implementation of the School IPM Plan. Accordingly, this section outlines the:

- Annual notification of School IPM program status.
- Pre-notification of planned use and notification of emergency use of non-low impact pesticides
- Posting requirements for areas indoors and out that are treated with pesticides
- Re-entry requirements for areas indoors and out that are treated with pesticides.

### Annual Notification

The School Superintendent will prepare and send an annual notice of school IPM program status to parents or guardians of each student enrolled at the school, and all staff members at the beginning of each school year. Once the annual notice has been sent, the Principal working with the IPMC will also give this information to new staff or the parents/guardians of new students upon their arrival.

The Appendix has a sample “Annual School IPM Program Notification Letter to Parents and Staff”. New Jersey law requires that this notice shall include:

1. A copy of the School IPM policy
2. The name, address, and telephone number of the integrated pest management coordinator of the school district.
3. A list of any pesticide that is in use or has been used within the first 12 months on school property.
4. A statement that:  
The integrated pest management coordinator maintains the product label and material safety data sheet when available, of each pesticide that may be used on school property;
  - a. The label and data sheet is available for review by a parent, guardian, staff member, or student attending the school; and
  - b. The integrated pest management coordinator is available to parents, guardians, and staff members for information and comment;
5. The following statement:  
*“As part of a school pest management plan, Woodbine Elementary School may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not post any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible;*

*persons who are potentially sensitive, such as pregnant women, infants and children should avoid unnecessary pesticide exposure.”*

#### Notification and Posting of Non Low Impact Pesticide Use:

There are two situations when non low impact pesticides may be used on school property; when it is pre-planned and when it is an emergency.

1. **Pre-Notification and Posting of Planned Non Low Impact Pesticide Use:**  
At any time of the year children may be present, the school will issue prior notification of all non- low impact pesticides to be used. Specifically the School Principal working with the IPM coordinator will issue notice to all staff and Parents/guardians of each student enrolled at the school.  
The area where the pesticide is applied will be posted at least 72 hours prior and 72 hours following the application.
2. **Emergency Use Notification and Posting for Non Low Impact Pesticide Use:**  
When an emergency application of pesticides is applied at the time of application; the area will remain posted for 72 hours following the application. Additionally, the school will issue notice of emergency use of non low impact pesticides to all staff and parents or guardians of each student enrolled at the school at least 24 hours after or the next school day, whichever is earlier. The reason for the emergency and measures how this will be avoided in the future may be included.

Regardless, in either situation, the school is required by law to make NJDEP prescribed notification and posting as described below. The Appendix contains sample written notification forms, “Pre-Notification of the Use of Pesticides” (72 hour pre notification) and “emergency pesticide use notification”, and a sample posting sign (for indoors and outdoors) ‘Notice of Pesticide Application’. The specific ‘what’, ‘how’ and ‘where’ requirements of the law that will be followed on school property on posting and notification follows:

**WHAT:** In either planned or emergency applications of non low impact pesticides, New Jersey law requires content of both notification and posting as follows:

- ✓ Common name of pesticide
- ✓ EPA registration number
- ✓ EPA statement on sensitive person: “Where possible, persons who potentially are sensitive, such as pregnant women, infants and children, should avoid any unnecessary pesticide exposure”
- ✓ Location description, date and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation)
- ✓ Potential adverse effects of product
- ✓ Reasons for the application
- ✓ Contact information for IPM coordinator of the school district
- ✓ Further label information or precautions for public safety

**HOW:** In either planned or emergency applications of non low impact pesticides the School Principal working with the IPM coordinator will advise the parents and guardians and staff of the school of pesticide applications by one or all of the following methods of notification.

- Written note that the students take home (see Appendix for sample notice)
- Written note that is mailed at least one week prior to the application (see Appendix)
- Phone call
- Direct contact
- Email

**WHERE:** In either planned or emergency applications of non low impact pesticides, per New Jersey law, the School IPM Coordinator will post signs:

- Prominently in/adjacent to the area where the pesticide is to be applied.
- At the entrance of the area (building/playground) where the pesticide is to be applied.
- Be at least 8.5” by 11”

#### **RE-ENTRY:**

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different from this. The use of low impact pesticides does not require an automatic seven hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

## **9. RECORD KEEPING AND EVALUATION**

#### Record Keeping:

The School IPM Coordinator will maintain records as listed in their outlined role and responsibility for school IPM. An initial meeting will be held between the School IPM coordinator and Pest Management Professional(s) annually, to establish an IPM log binder for these records.

The following records may be maintained in the IPM log binder kept in:

- Pest problem reports
- Food Services Areas Reports
- IPM Pest Activity Monitoring and Control Log
- Indoor Pest Thresholds for Woodbine School District

- IPM Priority Checklists
- Pesticide Application Log
- Annual School IPM Program Notification Letters to Parents and Staff
- Pre-Notifications of the use of the Use of Pesticides (72 hour pre-notification)
- Emergency Pesticide Use Notifications
- School Integrated Pest Management Act Compliance Certification Forms
- Posting Sign (for indoors and outdoors) "Notice of Pesticide"
- School IPM Report Cards
- IPM contract: Pest control Services for New Jersey Schools
- Specific service reports will also be placed in the log binder that document particular actions taken by the pest management contractor

The following issues will be addressed during the evaluation of the School IPM Plan and Program:

- Adequacy of pest control indoors and outdoors
- Areas of concern
- Sanitation issues
- Building maintenance issues
- New less toxic pest control tactics
- Adequate support by all members of the community
- Adequacy of thresholds
- Revise integrated pest management priorities
- Other: \_\_\_\_\_

Following evaluation, the School IPM will be revised by the Integrated Pest Management Coordinator accordingly.

#### **Indoor Pest Thresholds**

<b>Pest</b>	<b>Classroom/Public Areas</b>	<b>Storage/Maintenance Areas</b>	<b>Infirmery</b>	<b>Kitchen/Cafeteria</b>	<b>Grounds</b>
Ants (Common House)	50/room	50/100 $ft^2$ in 2 successive periods	00/room	50/room	2 mounds/yard
Ants (Carpenter)	20/room	20/room	20/room	30/room	1 nest within 25 ft
Bees (Honey)	3/room	5/room	3/room	5/room	1 nest within 25 ft
Bees (Bumble)	3/room	5/room	3/room	5/room	If children threatened
Bees (Carpenter)	3/room	5/room	3/room	3/room	If children threatened; carpenter bee/5 linear ft
Cockroaches	5/room	5/room	5/room	5/room	If noticeable or invading
Crickets	3/room	10/room	1/room	2/room	If nuisance
House Flies	5/room	5/room	5/room	5/room	5/trash can; 10/dumpster
Lice (head/body)	<i>Take no action - refer to nurse</i>				
Mice	1/room	1/room	1/room	1/room	Burrows or activity in any student area
Rats	1/room	1/room	1/room	1/room	Any burrows/activity
Silverfish	3/room	5/room	2/room	2/room	N/A
Centipede	3/room	2/room	2/room	2/room	N/A
Spiders (Poisonous)	1/room	1/room	1/room	1/room	1/activity area
Spiders (Other)	2/room	3/room	2/room	2/room	Only if nuisance

Wasps	3/room	3/room	1/room	3/room	10/10 minutes of trash
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