

INTEGRATED PEST MANAGEMENT PROGRAM

I. Policy Statement

Talbot County Public Schools (TCPS) is committed to providing a pest-free environment in all schools through the implementation of an Integrated Pest Management Program (IPMP). Our primary concern is for the health and safety of the students and staff at TCPS by avoiding the use of chemical treatment and improving the quality of the educational environment. In 1996 TCPS made the decision to concentrate our efforts in pest control through preventative routines as the main defense against pest infestation. This methodology emphasizes the use of non-chemical prevention techniques and corrective measures such as inspections, improved custodial practices, monitoring, non-chemical treatment, and structural corrections. Chemical spraying, fogging and other related treatment methods of pest problems and infestations are only to be used during the school year within the strict guidelines contained within the IPMP Program.

Structural pests, i.e. insects and rodents, carry diseases, contaminate food and food preparation areas and can cause structural damage thus posing significant problems to people, property, and the environment. Landscape pests, i.e. insects, weeds and diseases, can pose significant problems to students, staff and users of school properties. Pesticides can also pose risks through unnecessary exposures to people, property, and the environment. Pest control in the school environment must protect the health and safety of the children and staff, minimize pest damage to structures, personal property, improve the quality of the educational environment by avoiding annoyance and disruption of work and learning caused by insects, rodents and other pests. It is therefore the policy of TCPS to continue to update its Integrated Pest Management (IPMP) program for control of pests in school buildings and on school grounds.

II. Roles and Responsibilities

The IPM program will require the assistance and cooperation of the administration, staff and students. The TCPS has established the Plant Operations Supervisor to be its School District Representative (SDR) to serve as a liaison between the administration and pest control program in order to provide oversight, consistency in the pest control program and ensure the provisions of IPMP system are fulfilled. The SDR will advise the administration, staff, parents and guardians and students as necessary of IPMP program changes and new laws and regulations affecting the IPMP program.

The SDR will discuss the IPMP program and problem areas identified through the inspection and monitoring process. The SDR also serves as the liaison between the school administration and parents, guardian, students and staff to address questions and concerns regarding the IPM system and pest control practices. The SDR will make recommendations to correct problem areas.

Students and staff will comply with the provisions of the IPMP program by ensuring that areas requiring maintenance or repair, sanitation problems and pest problems or sightings are documented. Students and staff need to ensure good sanitation practices are followed.

III. Pests

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

IPM relies on the coordinated use of pest and environmental information and the best available pest management methods to prevent unacceptable levels of pest damage by the most economical means and with the least possible hazard to students, staff, property and the environment. Long-term control of pests is achieved by using information about the biology and habits of the pest and its interaction with its surroundings.

Proper installation of plants, appropriate watering regimes, and choosing plant species that are suited to specific sites and usage are some of the most effective measures for achieving long term pest control for school landscapes and grounds.

IV. Pest Management

The integrated pest management plan will be developed for TCPS as required by the Maryland's Regulations pertaining to Integrated Pest Management and Notification of Pesticide Use in a Public School Building or on School Grounds. Approved pest management plans will be developed for the site and will include any proposed pest management measures.

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 structures or property and prevent a reoccurrence of the problem.
- Prevent pests from spreading on the school grounds or to plant and animal populations beyond the site.
- Improve the quality of the educational environment for students, staff and the public.

V. Integrated Pest Management Procedures

IPMP procedures will determine when to control pests, and identify conditions contributing to pest problems through the use of monitoring and thorough inspections conducted at regular intervals. Problem areas will be identified where alternative pest control technologies can be incorporated in order to eliminate routine pesticide applications.

The necessity for pest control, if warranted, will be evaluated based on information obtained from inspections and monitoring. These actions will be based on action threshold levels that are to be established based on the individual school site and specific pest. Within school grounds, these decisions are based on key pests; key plants, and key locations found within the landscape. Action thresholds for school grounds should be based on pest management objectives that have been established to satisfy the needs associated with the usage of specific sites.

When pest control procedures are warranted in and around school buildings, one or more pest control methods including sanitation, structural repair, cultural practices, mechanical control, biological, other non-chemical methods and pesticides will be utilized.

IPMP Contractor(s) will depend on current, comprehensive information on the pest and its environment and the best available pest control methods. By applying IPM principles, unacceptable levels of pest activity and damage will be prevented by the most economical means while minimizing the risk to human health and the environment associated with pesticide applications.

When it is determined that a pesticide must be used in order to meet vital pest management goals, the least hazardous pesticide will be selected. The application of such pesticides are subject to the TCPS policies and procedures and all applicable state, federal and local regulations including the Maryland Pesticide Applicators Law and Regulations, and the Federal Insecticide, Fungicide, and Rodenticide Act.

The choice of using pesticides will be based on a review of all other available options and a determination that these options are unreasonable or have been exhausted, in order to minimize the use of pesticides. Cost or staffing considerations alone will not be adequate justification for the use of pesticides, and selected non-chemical pest management methods will be implemented whenever possible to provide the desired control.

It is the policy of Talbot County Public Schools to utilize IPMP principles to manage pest populations adequately. The full range of pest control alternatives, including no action, will be considered.

VI. Record Keeping

Records of pesticide use shall be provided to the school by the Contractor(s) at the time of the pesticide application and will be maintained by the SDR for 2 years. Records must be current and accurate. In addition, pest surveillance data sheets that record the number of pests, location, or other indicators of pest populations are to be maintained to verify the need for treatments.

Documentation of communications to students and staff regarding IPM and pesticide use will be maintained by the SDR.

VII. Pesticide Purchase and Storage

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 regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel.

VIII. Pesticide Applications

Pesticides may be used after it is determined that non-toxic options are unreasonable or have been exhausted. The least hazardous pesticide will be selected and the method and time of application will be based on the goal to minimize the potential for exposure of students and staff to the pesticide.

Pesticide applications made on school property will be conducted by a properly licensed Contractor(s), an individual certified as a pest control applicator or by a registered employee working under the supervision of a certified applicator. Applicators must be trained in the principles and practices of IPM and the use of pesticides. They must follow state and federal pesticide regulations and label precautions and comply with this IPM Policy.

IX. Program Evaluation

An annual review of the IPMP program will be conducted by the SDR to determine the effectiveness of the program and that program objectives have been achieved. This will include the review of inspection reports, sanitation reports, and other records to establish current conditions, progress of the program against pest problems and conditions, effectiveness of action thresholds, and to identify problem areas in the IPMP program that may need to be modified or changed.

X. Notification

TCPS will notify the school staff, students, parents and guardians prior to pesticide applications made in school buildings and on school grounds in accordance with Maryland regulations. Notices will be posted in designated areas at school and sent home to parents and guardians of elementary school students and parents and guardians of middle school students and high school

students who wish to be informed in advance of pesticide applications and are on the pesticide notification list.

XI. IPMP Program Manual

Each school/building's Head Custodian is provided with their own copy of the IPMP Program Manual. Additional copies are available for review in the Plant Operations Office.

Talbot County Public Schools

Integrated Pest Management Program (IPMP)

Program Manual

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I. General Requirements

A. Background:

The basis of these Integrated Pest Management (IPMP) services is the regular monitoring for the presence of insect, rodent and weed pest infestations both internally and externally in all Talbot County Public Schools (TCPS) and buildings. The goal of the IPMP is to implement effective, long-term pest control while minimizing the use of insecticides. Scheduled or routine use of chemical treatments is expressly prohibited in all TCPS buildings during the school year. Chemical treatments such as pesticides are considered an effective IPM method, but shall only be used when other appropriate aspects of the IPMP program have been attempted and then only under specifically controlled guidelines. It is essential to the success of this program that the IPMP Contractor and the Plant Operations Department provide proactive services that identify housekeeping, structural, landscaping and procedural deficiencies that contribute to pest problems, and correct these deficiencies. The Contractor(s) and the Plant Operations Department will exhibit an awareness and sensitivity to the fact that the students' school environment must not be compromised through inadvertent use of chemical treatment. All IPMP services shall be planned and performed with the safety and needs of the students and staff as the foremost priority.

B. Description of Services:

The Contractor(s) shall furnish all labor and materials for the development and implementation of a comprehensive Integrated Pest Management Program (IPMP) for all TCPS as set forth in this IPMP policy. The Contractor shall demonstrate in their proposal a complete understanding of the concept of an IPMP method of pest control. Adequate and proper pest control is achieved in an IPMP program by making accurate decisions as to which type of control methods are needed and then used. Control practices in an IPMP program will not be based on the solely on routine application of chemical treatment, but also on proper monitoring, inspection, sanitation improvements, structural modifications, and the changing of student and staff practices that contribute to pest problems.

The Contractor(s) shall also provide evidence of an understanding of the principles and practices governing sanitation in Food Service areas, Nurses offices, and school based Wellness Centers as well as the impact of pest management services on the on-going activities of the school system. The IPMP shall consist of the development and implementation of a regularly scheduled pest management process, meetings as needed between service technicians and designated school staff, all necessary training and proper documentation in accordance with this policy. All components of the IPMP shall be site specific to include initial program implementation, program status monitoring, written

recommendations, and procedural evaluations in order to facilitate effective pest control and prevention prior to the use of any chemical based corrective measures.

C. Designating a School District Representative:

In order to provide the highest level of consistency in the IPMP program TCPS will designate a School District Representative (SDR) for the entire county as well as designating a liaison for each individual school. These people will be responsible for addressing all pest management issues regardless of the pest involved or the area affected. The SDR will participate in all decisions that affect (directly or indirectly) the IPMP. A list of all school liaisons and the name of the SDR shall be furnished to the Contractor(s) by TCPS.

The Contractor(s)' technician shall meet with the SDR or school site liaison upon arrival to a school facility and prior to any performance of pest management services. The purpose of this contact will be to:

1. Identify and discuss specific problem areas.
2. Facilitate access to all affected areas.
3. Identify structural features and personnel practices that may be contributing to pest infestations.
4. Evaluate the IPMP effectiveness.
5. Notify the Contractor(s) of any new restrictions or special safety considerations.

D. Pests Included and Excluded:

1. Pests that are included:
 - a. IPM services shall adequately suppress all invertebrate and vertebrate pests, such as but are not limited to, cockroaches, ants, fleas, stinging insects and nests, mice, head lice, silverfish, spiders, any incidental invaders (swarming) that may occur during seasonal changes.
 - b. Infestations of the above-mentioned pests that are outside of a school or building, but within areas immediately adjacent to the school or building. These areas will include playgrounds, out buildings, and trash dumpsters.
 - c. Weeds and unwanted vegetation.

2. Pests that are excluded:

- a. Termites, carpenter ants, and other wood destroying organisms.
- b. Mosquitoes
- c. Birds, bats, snakes, and all other invertebrates other than the incidental incursion of the pests into the school or building.

E. Pest Management Plan and Service Schedule:

The Contractor(s) shall conduct a thorough initial inspection of each school site both of the interior and exterior. The purpose of the inspection is for the Contractor to develop a written IPMP prior to the performance of any service. The IPMP shall include a written evaluation of all possible problem areas previously noted that may contribute to pest infestation and any recommendations for the correction of the noted deficiencies. The Contractor(s) will be provided access to the school buildings and/or grounds by the SDR or the school site liaison as well as information regarding any special "school-specific" safety restrictions or scheduling considerations. These school-specific safety restrictions will be incorporated into the site specific IPMP from the Contractor(s) for each school. Included in this report will be a detailed description as to the procedures for a pest-monitoring program, IPMP techniques, control practices and procedures, exclusion practices, and other pest control methodologies. The Contractor shall submit a written service schedule for each site outlining dates and times of service. The IPMP and Service Schedule will be submitted to the SDR and receive written TCPS approval prior to the implementation of the program. Chemical treatment and pesticide usage will be strictly prohibited unless otherwise approved in writing by the SDR and then only under specified guidelines.

The Pest Management Plan shall consist of five (5) parts:

1. Proposed methods and equipment serviced:

The Contractor(s) shall provide a detailed summary of proposed control methods, control products (pesticides). Material Safety Data Sheets (MSDS), bait boxes, traps, gels monitoring devices, a description of application equipment to be used and any other products or devices that may be deemed necessary in the performance of the IPMP.

2. Proposed methods of monitoring and surveillance:

The Contractor(s) shall describe methods and procedures to be used for identifying pest harborage and access and for making objective assessments of pest population levels.

3. Inspection schedule for each site:

The Contractor(s) shall provide recommended service schedules that are site specific and when practical, include frequency of visits, specific days of the week, and approximate duration of the visit.

4. Structural and operational recommendations:

The Contractor(s) shall describe site-specific solutions for the observed sources of pest food, water, harborage, and access.

5. Licensing:

On-site pest management services shall only be provided by technicians who are certified by the Maryland State Department of Agriculture. The Contractor(s) shall provide a current list of names along with copies of applicator certificates for all persons performing any IPMP work in Talbot County Public Schools.

F. Structural and Procedural Recommendations:

Structural deficiencies, poor housekeeping practices and poor landscaping practices that contribute to pest infestations shall be reported by the Contractor(s) in writing to the SDR and school site liaison. The report will include advice to the SDR as to proper corrective procedures for eliminating the infestation.

G. Record Keeping:

The Contractor(s) shall provide and maintain a complete and accurate pest management logbook at each site/facility. This logbook will be kept in a designated location and shall document concise records indicating the type of pest found (using common names), non-pesticide control methods used, housekeeping or structural defects, and corrective methods taken. A section of the logbook shall be designated for facility personnel to report pest sightings and other pertinent information to be reviewed at each regular service.

Each logbook shall contain the following:

1. Pest Management Plan: including all labels and MSDS sheets for all proposed methods of treatment, brand names of pest control devices and equipment that would be used in a facility.
2. Service and Complaint Logs: which includes a proper format for recording service visit activities and staff concerns over pest infestations or treatment procedures.
3. Service Report Forms: including customer copies of a Service Report Form from the Contractor documenting pest sightings, sanitation/environmental status, building maintenance needs, and treatment procedures used.

H. Contractor(s) Business License and Insurance:

The Contractor(s) shall have and maintain a current Pesticide Business License issued by the Maryland Department of Agriculture in addition to all applicator certificates. The Contractor must provide proof of appropriate insurance coverage at a level that is acceptable to TCPS.

I. Personnel:

The Contractor(s) shall provide only qualified pest management personnel with appropriate experience in the maintenance of an IPMP program.

J. Manner and Time to Conduct Services:

Routine inspection within school facilities shall not interfere with the ongoing activities of the schools. Services within facilities shall be performed during the late afternoon hours, Monday through Friday, unless specifically approved by the SDR. During the course of a scheduled or inspection service visit only non-pesticide methods of treatment will be acceptable. These methods will include, but are not limited to, the use of traps, structural corrections, housekeeping and sanitation improvements, and other methods that exclude or reduce the need for pesticide applications.

K. Special Requests Services:

All special requests, including any services to be provided on the grounds and fields belonging to the schools shall be coordinated and approved by the SDR and must comply with policies of this IPMP.

II. PEST CONTROL

A. Non-Pesticide Control Measures:

Preventative pest exclusion by caulking and sealing pest harborage and pathways is the preferred method of treatment. In addition increased housekeeping/sanitation practices to eliminate pest food sources and water sources will be used. Secondary methods such as the use of vacuum cleaners, mechanical traps, and light traps shall be integrated into the IPMP program as the preferred method of pest removal.

All methods of pest removal as stated above shall be placed out of sight so as not to be accessible to students or staff and will not disrupt normal cleaning procedures.

Mulching and manual removal of unwanted vegetation such as poison ivy, weeds, etc., is the preferred method of treatment for vegetative infestation.

THESE METHODS OF PEST CONTROL ARE THE PREFERRED PROCEDURES TO BE USED DURING THE SCHOOL YEAR.

B. Pesticide Control Methods:

The necessity for pesticide control will be evaluated based on information obtained from inspections and monitoring. Action threshold levels will be established based on the specific school site and specific pest and the documentation will be maintained both at the individual school site and, centrally, by the SDR for all TCPS facilities and grounds.

Pesticide applications within a school facility are generally allowed only during the summer months when school is not in session. Pesticides are to be used after all other methods outlined in the IPMP have been deemed to be ineffective against a pest infestation. The use of pesticide treatment will be approved by the SDR and applied in the areas of known infestation or activity. When it is determined that a pesticide must be used in order to obtain an adequate control of an infestation the Contractor(s) will utilize the least hazardous material, most precise application procedure, and minimum quantity of product to achieve control.

The Contractor(s) shall be responsible for the proper use of all pesticides in accordance with the label, MSDS, and applicable state laws and regulations governing the use of the appropriate product.

THE ROUTINE APPLICATION OF PESTICIDES WITHIN SCHOOL FACILITIES AS A PREVENTATIVE BARRIER OR THE SPRAYING/AND FOGGING OF A GENERAL AREA IS STRICTLY PROHIBITED DURING THE SCHOOL YEAR.

The Contractor(s) shall not store or dispose of any pesticide product on Talbot County Public School Property.

The Contractor(s) shall not sell, distribute, or make available any pesticide products to anybody in the school system.

C. Rodent Control:

Rodent control inside of buildings is to be accomplished only with trapping devices that will be out of the general view of the building occupants and in protected areas not to be effected by general cleaning procedures.

In the event that it is necessary to treat for rodents outside of the building, methods will emphasize the direct treatment of burrows and nests. Bait boxes placed outdoors of the school facility are prohibited unless approved in writing as an emergency measure by the SDR.

III. Program Evaluation, Quality Control, Training, and Education:

A. Program Evaluation: The Contractor(s) shall provide service reports to the SDR that will include the following information:

1. All schools serviced during the previous month.
2. Man-hours for each school.
3. Results of inspections, monitoring devices, structural and environmental deficiencies found, recommendations for correction, and any non-chemical treatments applied to include specific quantities and their locations.
4. Recommendations for improving the IPM program.

B. Quality Control: The Contractor(s) shall meet with the SDR on a quarterly basis to review all service reports and to jointly identify recurring problem areas and infestations. Based on their review of the reports corrective actions and alternative means of pest management control procedures will be established and future pest management strategies planned.

C. Training: The Contractor(s) is responsible for the complete and proper training of all pest control service technicians provided by the Contractor and shall, when requested, provide the SDR with documentation of training completion.

- D. Education: The Contractor(s) shall, when requested, provide annual training for TCPS personnel including Maintenance, Custodial, School Administrative, and Food Service staffs. Training shall include the following:
 - 1. Description and overview of the IPM program.
 - 2. The role of each staff member in the IPM program that is specifically related to their own area of responsibility.

IV. Additional Considerations:

- A. Notification: All persons that are expected to be in a TCPS building within 48 hours of the application chemical treatment, spraying, or barrier application shall receive written notification of that treatment.
- B. Space Spraying: A space spray is a pesticide that is discharged into the air throughout an entire room or area by a fogger or aerosol device, usually to control flying or crawling insects. Before a space spray can be used in any school, the school must notify each parent or guardian and staff member one week before the pesticide is applied. This notice must include the same information as the other notices described in the IPMP.
- C. Written Notification: Notification shall include the name of the chemical to be used, specific area of the building to be treated, anticipated date and time of treatment, and instructions on where to obtain copies of MSDS information or any additional information, as provided by Maryland law.
- D. Documentation: The Building's administrative office and the SDR shall keep a copy of all notifications that were sent.

CONTACT PERSON

Title: Plant Operations Manager
Talbot County Education Center
12 Magnolia St.
P.O. Box 1029
Easton, MD 21601
Telephone: 410-822-0330

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