

Superintendent Procedure 6895SP Integrated Pest Management

Approved by: s/S. Enfield Date: 2/28/12

Dr. Susan Enfield, Interim Superintendent



The Seattle School Board strives to create healthy learning and working environments for students, staff, and the Seattle community. Because children are especially vulnerable to exposure to toxic chemicals, and often receive larger doses due to their body size and behaviors, the Board seeks to actively prevent children's exposure by reducing or eliminating use of pesticides and other toxic chemicals within the District. Health, behavioral, and neurological impacts of pesticides will be evaluated to ensure that only if necessary and as a last resort least-toxic products are used, and that District pest control practices protect the health of the entire school community.

Integrated Pest Management (IPM) is an approach to pest control (including control of insects, rodents, vegetation, plant pathogens, and other pests) that utilizes regular monitoring to determine if and when treatments are needed and employs physical, mechanical, cultural, biological, and least-toxic chemical strategies to keep pest numbers low enough to prevent intolerable damage or annoyance. Pesticides, when required, are selected to minimize exposure and toxicity to humans, with an emphasis on protecting children's health, and also to protect non-target organisms and the environment. The focus of the IPM program is long-term, sustainable prevention or suppression of pest problems. Cost-effectiveness in both the short- and long-term is considered in the prevention and treatment selection process.

A successful IPM program welcomes and relies upon active participation by all members of the school community. Responsibility and authority for implementing the preventative strategies that minimize pest problems lie at all levels of District staff. It begins with building and landscape design and follows through to daily cleaning and maintenance. Keeping pests at low levels over time requires attention to infrastructure. Appropriate cleaning and maintenance schedules, as well as regular up-keep, preventative maintenance, and repair are essential to keeping buildings and grounds healthy and pest-free. Seattle Public Schools seeks to educate the staff, students, families, and the Seattle community about the IPM methods they are employing, and the considerations of health and well being for humans and the environment.

1. Pesticide Use

- A. "Pesticide" means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant (EPA, 40 CFR 152.30). The term "pesticide" includes, but is not limited to: herbicides, insecticides, rodenticides, repellents, fungicides, and moss killers. For this purpose, "pesticide" does not include cleaning chemicals.

- B. Pesticides are to be used only as a last resort for solving pest problems, and only least toxic products will be used. This applies to any and all uses by groundskeepers, custodians, contractors, or during construction. The pesticide selection criteria in this policy (section 5) will be used to determine what products are allowable for use in the District.
- C. Pesticide use will be in compliance with all applicable laws and regulations regarding use, notification, posting, and recordkeeping. Teachers, parents, or other school community members shall never apply pesticides, including commercially available products such as bug spray or weed-and-feed, on school property.
- D. All exceptions to this policy shall be made only by a written finding by the District IPM Coordinator. If exceptions to the pesticide use criteria are necessary, the District IPM Advisory Committee will review and make recommendations to the District for each exception request, prior to application of the exception product where time permits, based on:
- Critical need for the product and use within an overall IPM strategy,
 - Need to protect human health or safety, as opposed to use for purely aesthetic purposes,
 - Legal, public health, or safety considerations,
 - Hazard criteria triggered,
 - Mitigating factors,
 - Monitoring for effectiveness of treatment,
 - Resource constraints,
 - An evaluation of all feasible alternatives including non-chemical and no-action alternatives, and
 - The safety, health, and environmental impacts of the alternatives.
- E. Any and all contracts, RFPs, or bid documents, etc. that include pest control activities (including vegetation control) will include requirements to follow this policy, including the exception process, and only use approved pesticides on District property.
- F. Buildings and grounds shall be designed and constructed to minimize pest problems and pesticide use. Construction methods shall comply with District policy on pest management and pesticide use.
- G. Buildings and grounds shall be operated and maintained to prevent and minimize pest problems and pesticide use.

2. Integrated Pest Management Coordinator and Advisory Committee

- A. The District's Director of Facilities will appoint an IPM Coordinator to implement this policy.
- B. The District's Director of Facilities will establish an on-going IPM Advisory Committee to oversee and make recommendations regarding implementation of this policy and its goals to the District. The committee will include the District IPM Coordinator and the Manager of Custodial and Grounds, and not more than

two from each of the following categories: groundskeepers/custodians, teachers/principals, families/students, and environmental- or health-concerned community members. The Committee may also include liaisons from the City or County who are working on IPM. Other community members are welcome to attend IPM meetings. All committee members must live or work within the District boundaries, and will be chosen by the IPM Coordinator with the assistance of the Manager of Custodial and Grounds. Individuals with financial or other conflicts of interest may not sit on the committee.

- C. The IPM Committee will meet at least quarterly, and will be responsible for reviewing and making recommendations to the District relating to:
- Evaluating exception requests,
 - Reviewing and establishing exception criteria,
 - Assisting the staff with researching and learning IPM techniques and identifying least-toxic products and other sustainable practices,
 - Reviewing and commenting on an annual review of the District pest management practices and progress on goals,
 - Setting IPM and pesticide reduction goals,
 - Ensuring that contracts include and use IPM,
 - Reviewing and assisting with notification information, practices, and procedures,
 - Identifying opportunities to invest in structural pest prevention, including building and landscape design/redesign,
 - Assisting to identify and implement IPM outreach and education opportunities with the school district and broader community,
 - Evaluating health and environmental impacts of pesticides, and
 - Monitoring and reviewing IPM practices.

3. Notification

- A. The District will comply with all state and national posting, notification, and recordkeeping laws regarding pesticide use.
- B. At the beginning of each school year, the District will send home a notice about the District's IPM policy, pest management practices, pesticides used, IPM committee, and other relevant information. This notice will also be available at all District enrollment centers and on the District website. This and other notices will be translated and distributed in all primary languages represented within that school.
- C. When notification of pesticide applications is required, the District chooses to do universal, written notification to all families and staff. An exception shall be made when the District IPM Coordinator or his/her designee determines that emergency control required of a pest that poses an immediate human health or safety threat, in which case notification will take place as soon as possible after the application. These notification procedures do not apply to containerized baits that are placed in areas inaccessible to students.
- D. Signs will be placed at the main entrance to each school, athletic field, building, or other area being treated, as well as at the specific location of application a

minimum of 48 hours prior to any application, to notify site users of the pesticide use and prevent contact with the treated area. Signs shall be left in place for a minimum of 72 hours post-application or longer as appropriate

- E. Notification signs must be at least 8.5 by 11 inches, readable at a distance, and be on paper of brilliant, eye-catching color. Notifications signs will include: WARNING: PESTICIDE APPLICATION; product name; active ingredients; intended time and date of application; name and phone number of an available contact person where pesticide label, MSDS, and chemical fact sheets may be obtained; boxed-off warning stating “CAUTION: Individuals taking medication, pregnant women, infants, children, and individuals with respiratory or heart disease, chemical sensitivities, or weakened immune systems may be particularly susceptible to adverse health effects due to pesticide exposure.”
- F. At each school site all of the information referenced in Section 3E above, along with this policy/procedure and other relevant IPM information will be kept and be available for review.

4. Education, Outreach, and Training

- A. Annual IPM trainings should be provided or identified for all District staff members with direct pest management responsibilities.
- B. Other District employees, including the custodial staff, food service workers, teachers, and administrators, should have IPM information distributed to them at least once a year, and opportunities to present information about the IPM program and their role in it should be identified as they occur.
- C. Opportunities to educate the school and broader Seattle community about successful, least-toxic pest management and the District’s work and policy should be utilized whenever possible. The District website should include information about the IPM policy, IPM committee, pesticide use, volunteer opportunities, and other resources for the District staff and community, and highlight the work of the grounds department. The District should utilize, whenever possible, curriculum, students involvement, service learning, PTSA/Site Council educational forums, and school gardens as opportunities to educate the community about IPM.

5. Pesticide Use Selection Criteria

If any active ingredients or other known ingredients in a product meet one or more of these criteria, then the product shall not be used in the District. This list of criteria is subject to change with the availability of additional resources. Therefore, this list shall be reviewed annually to determine whether new resources should be used.

A. Acutely toxic to humans.

- Classified as Toxicity Category I or II by the United States Environmental Protection Agency (USEPA). Danger or Warning will be listed on the label.

B. Acutely toxic to aquatic insects, fish, aquatic and semi-aquatic plants, wildlife, or domestic animals.

- The Environmental Hazards Section of the label will state toxic, highly toxic, or extremely toxic; or
- The USEPA Office of Pesticide Programs Reregistration Eligibility Decisions (REDs, IREDs, and TREDs) states that the level of concern is exceeded.

C. May cause cancer in humans.

- Classified as a known, likely, probable or possible carcinogen by the USEPA; or
- Classified as a known, likely, probable or possible carcinogen by the International Agency for Research on Cancer (IARC); or
- Classified as known or reasonably anticipated to be human carcinogen by National Toxicology Program; or
- Listed by State of California as a known carcinogen.

D. Nervous system toxicant in humans.

- Cholinesterase inhibitor or neurotoxic by mode of action; or
- Listed as neurotoxic in USEPA Toxics Release Inventory.

E. Reproductive or developmental toxicant in humans.

- Classified as known or reasonably anticipated to be a reproductive or developmental toxicant by National Toxicology Program; or
- Listed by State of California as a reproductive or developmental toxicant.

F. Disrupts hormonal systems.

- Listed by Illinois EPA as a known, probable, or suspected endocrine disruptor.

G. Persists in the environment.

- Average soil half-life of 100 days or greater as listed by Agricultural Research Service; or
- Average soil half-life of 100 days or greater as listed by OSU Extension Pesticide Properties Database

H. High or very high mobility in soils.

- Groundwater Ubiquity Score of 3.0 or as listed by Oregon State University Extension Pesticide Properties Database; or

The Environmental Hazards Section of the label warns of leachability or detections in surface water or groundwater.

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Revised:

Cross Reference: Policy No. 6895