

POLO CUSD #222



INTEGRATED PEST MANAGEMENT PLAN

Revised March 2009

Polo School District believes the best way to control pest infestations is through the use of an Integrated Pest Management (IPM) plan. Polo understands that an effective IPM plan in schools involves the cooperation of school staff and pest control personnel to combine preventive techniques, nonchemical pest control methods, and the appropriate use of pesticides with preference for products that are the least harmful to human health and the environment.

GOALS OF POLO'S IPM PLAN

Whenever possible, Polo's IPM plan will include the following elements:

- The identification of pests and their natural enemies;
- The establishment of an ongoing monitoring and record keeping system for regular sampling and assessment of pest and natural enemy populations;
- The determination of pest population levels that can be tolerated on aesthetic, economic and health concerns, and setting action thresholds where pest populations or environmental conditions warrant remedial action;
- The prevention of pest problems through improved sanitation, management of waste, addition of physical barriers, and the modification of habitats that attract or harbor pests;
- The reliance to the greatest extent possible on nontoxic, biological, cultural or mechanical pest management methods, or on the use of natural control agents;
- The use of chemical pesticides when necessary, with preference for products that are the least harmful to human health and the environment; and
- The record keeping and reporting of pest populations, surveillance techniques and remedial actions taken.

(Source: P.A. 87-1106)

PLAN COMPONENTS

1. Integrated Pest Management includes monitoring, regular pest inspections, sanitation and pest proofing measures, or modification of environmental conditions leading to pest problems.
2. The District has established 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. 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 for spot treatments targeted to insect nests or problem areas where a minimal amount of material is used.
6. The School District will keep records of all pest control measures, pesticides used, and amounts and locations of treatments. Pesticide use and pest control records, pesticide Material Safety Data Sheets (MSDSs), pesticide product labels, and available manufacturer information about inert ingredients will be on file in the facility. Additionally, records of all pest control actions are to be maintained including information on the number of pests or other indicators of pest activity that can verify the need for action. 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.
7. 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. Neighbors immediately adjacent to school property will be notified at least 2 business days in advance of outdoor pesticide applications. Antimicrobial agents and insecticide and rodenticide baits are exempt from notification requirements.
8. Parents and staff will be informed annually about the district's IPM policy.

Emergency Situations

From time to time, there are issues with pests that endanger the health of the students and/or staff. In these instances, it may not be possible to follow all of the IPM plan timelines. The following protocol should be followed in these circumstances.

1. Conference call or brief meeting of authorized decision-makers to determine if the circumstance rises to an emergency considering the following circumstance:
 - a. Pest presents an imminent risk to public health.
 - b. The delay associated with notification would lead to significantly greater harm from the pest.

- c. Risk from the pest is greater than risk from the pesticide.
 - d. The pesticide can be used in a way to reduce harm to public health.
- 2. IPM Coordinator or other authorized individual signs off on a request to use pesticides
- 3. After the emergency has been averted, a meeting with the IPM Coordinator, pest management professional and other relevant staff is called to discuss the problem and how it can be avoided next time.
- 4. Parents, guardians and staff receive notification of pesticide use as soon as possible after emergency has been averted.
 - a. Notification describes what was used and the conditions that gave rise to the emergency.
 - b. Copy of notification and information about pesticide used are filed.

TOLERANCE OF PEST ACTIVITY

Roaches: There will be no tolerance for roaches in any area of the facility as they can carry pathogens that can cause health problems under certain circumstances.

Cereal Pests: These infest flour and other cereal grain products and will not be tolerated.

House Flies: In non food areas these are more of a nuisance than a threat to health. An occasional fly in a nonfood area should not be cause for alarm, but if there are many flies in a nonfood area it could be a sign of a sanitation problem that needs to be investigated and corrected. House flies in food area will not be tolerated.

Other Flies: Flies such as the Cluster Fly or the Carrion Fly are often found throughout the school, and small numbers do not constitute a health threat. They can be a nuisance and should be treated as such. Many flies in a room or area could indicate a problem and needs to be investigated and corrected.

Ants: In a food area they will be eliminated immediately. In nonfood areas they are strictly a nuisance and will be treated as such. Ants outside a building that are not migrating to the building should be left alone as they can be beneficial in controlling other populations.

Occasionally Invading Pests: These include crickets, spiders (except Brown Recluse and Black Widow Spiders) Box elder Bugs, Millipedes, Clover Mites (not Fowl Mites), Springtails, etc... These insects are not a health threat and only become a nuisance if they appear in large numbers or they are found near open food areas.

Stinging or Biting Insects: These include bees, yellow jackets and other wasps, brown recluse and black widow spiders and can cause a series threat to some who are hyper allergic to stings or bites. There will be no tolerance for these pests either inside or outside of the building.

Mice: There will be no tolerance in any area of the school.

Rats: There will be no tolerance inside or outside of the school building at any time.

Birds: Generally birds do not present a problem for a school, but bird nesting on school buildings should be discouraged in order to prevent an accumulation of droppings.

Raccoons: These are protected animals and can only be removed by a specialist licensed by the Illinois Department of Natural Resources. They should be removed from the school grounds.

Squirrels: These are protected animals and can only be removed by a specialist licensed by the Illinois Department of Natural Resources.

Bats: These are protected animals and can only be removed by a specialist licensed by the Illinois Department of Natural Resources. They will be removed from the school grounds.

RESPONSE TIME TO PEST SIGHTING REPORTS

| Response Time | Condition | Pest |
|-------------------------|---|--|
| Not over four hours | Potential physical harm to students or staff | Rodents where students or staff are likely to contact them; Wildlife (raccoons, opossums, feral cats, bats, etc.) where students or staff are likely to contact them; Stinging or biting insects |
| One working Day | Potential medical harm to students or staff | Fleas, Lice, Bed/Bat bugs and Poisonous spiders |
| One working day | Potential for food contamination | Cereal pests, Roaches, Rodents, Ants in kitchen or food storage areas and Flies around food. |
| One to Two working days | Sightings of large numbers of nonthreatening bugs | Ant or Termite colonies in the building; movement into the building of Millipedes, Crickets, Box elder bugs, etc. |

INSPECTION AND REPORTING SYSTEM

At a minimum of once a month a comprehensive inspection of key identified areas (kitchens, home economics room, locker rooms, restrooms, etc...) will be conducted by trained pest control operator. The inspections will coincide in terms of time and location with the evaluation of documented reports of pest sightings turned in by staff members.

The trained pest control operator will:

1. Know the life cycle and habits of pests most likely found in schools;
2. Know where the signs of these pests are most likely to be found in the school facility;
3. Be familiar with the many unusual ways these pests can enter the school facility;
4. Have access to all areas of the facility;
5. Identify or obtain an accurate identification of any specimen provided by the school IPM Coordinator (district superintendent);
6. Talk to the staff person who made out the pest sighting report, evaluate the information and make a decision on any subsequent action to be taken;
7. Be familiar with pesticide safety procedures and respond to emergency situations as the need dictates;
8. Make written recommendations for the upgrading of the facility and for the changing of procedures to diminish the ability of pests to get in or to find harborage areas in the facility;
9. Follow up on the recommendations and/or changes in procedures to confirm that they have been completed; and
10. Provide a detailed written report each month on the **RECORD OF PEST CONTROL PROCEDURES** form.

The superintendent shall act as the IPM coordinator and shall be the designated person to assume responsibility for the oversight of pest management practices and record keeping requirements for the district. The duties include the following:

1. Receive and make preliminary evaluation of all written reports from other staff members that would include:
 - a. Reports of an occasional invader; these should be handled in accordance with the procedures set up under the "response times"
 - b. Reports of unknown pests should be passed on to the trained district staff member(s) for evaluation;
 - c. Reports of those pests deemed to need immediate action should be passed on to the trained custodial/maintenance personal who is designated to handled the situation as soon as possible.
2. Coordinate any pesticide applications with the many activities that are common in most schools with the goal being to minimize exposure of students and staff to pesticides;
3. Ensure that all areas of the school are accessible for inspection and/or application of control methods;

4. Ensure that any monitoring devices such as sticky traps between the periodic inspections are checked by the trained custodial/maintenance staff, if deemed advisable;
5. Be in charge of seeing that structural changes or changes in procedures are carried out;
6. Maintain written reports and recommendations in a file for review as needed; and
7. Review all written reports every six months and ensure that recommended changes are completed.

Guidelines for Periodic Inspections

Pests can occur in machinery, stacked products, dumpsters, product spills, kitchens and storage areas, excessive clutter, poor lighting locations, inaccessible storage areas and rooms located above or below infested materials.

1. All inspections should be conducted with bright flashlights. A knife or spatula, a good hand lens, screwdrivers and mirrors are also useful equipment.
2. Flushing agents (small aerosol cans of pyrethrum insecticides used to aid the inspection of voids) can be used, but care must be taken not to contaminate foodstuffs or expose occupants of the facility.
3. Inspect the pathway of incoming supplies to detect problems.
4. Special attention should be given to all spills. Check for dead insects and tracks in spilled products or dust.
5. Inspect the back of pantry shelves, floors under shelves and all dark areas.
6. Traps that use a sex attractant (pheromone) are available for nearly all stored product pests and roaches, which may be used to conduct routine inspections.
7. Keep written inspection records. Results of inspections and recommendations for changes by management or maintenance should be written in an easily understandable form.

The trained pest control operator will obtain the assistance of other staff members to monitor pests throughout the school which will enable the trained custodial staff to devote attention to kitchens, food storage areas, and other rooms where pest invasion is likely.

Staff members should file written Pest Sighting Report to the designated area when pest populations are observed in various areas of the school in order for our district to maintain an effective IPM program.

MONITORING OF AREAS FOR PESTS

| Area | Cooks | IPM Trained Staff Member(s) | Custodians | Teachers and Staff | Students |
|-----------------------------------|-------|-----------------------------|------------|--------------------|----------|
| Kitchen and Storage Areas | X | X | X | | |
| Restrooms | | | X | X | X |
| Locker Rooms | | X | X | X | X |
| Utility Rooms and Janitor Closets | | X | X | | |
| Entrances and Hallways | | | X | X | X |
| Classrooms | | | X | X | X |
| Outdoor areas | | X | X | X | X |
| Cafeteria | X | X | X | X | X |
| Staff Lounges | | X | X | X | |
| Student Lockers | | | X | | X |

The enclosed PEST SIGHTING REPORT should be used to report pest sightings to the pest control operator so problem areas can be identified.

A routine monthly inspection schedule will be created by staff for kitchens, product storage areas, boiler rooms, custodial closets, locker rooms, and other key locations that are most likely to be subject to pest invasions. The PEST SIGHTING REPORT should be used for the monthly inspections conducted in the identified key locations with all reports turned into the IPM Coordinator or the pest control operator.

At least once per month the trained custodial staff should check glue traps and other monitoring devices for evidence of pest infestation.

INVESTIGATION OF PEST SIGHTINGS AND IPM MEASURES TAKEN

The trained district custodial/maintenance staff should file a monthly report of pest infestations with the pest control operator on the PEST SIGHTING REPORT. The significance of the infestation as a health or nuisance issue, the type of action taken by the pest control technician, and any recommendations to reduce or eliminate conditions that encourage pest infestations should be included on the report.

FOLLOW UP AND EVALUATION OF PEST CONTROL MEASURES

All must be aware that pest problems may change. Pest may actively invade schools or be introduced on dry goods, food packaging, pallets, school bags, or other sources. As a result, our IPM program must be reevaluated periodically. It is essential that changes in food handling procedures or repairs recommended by district staff be acted on in a timely manner. A quarterly evaluation of the IPM program is important because changes within the events of the school can affect long-term success of the IPM program.

PESTICIDE APPLICATION REGISTRY NOTICE

Polo C.U.S.D. #222 practices Integrated Pest Management, a program that combines preventive techniques, non-chemical pest control methods, and the appropriate use of pesticides with a preference for products that are the least harmful to human health and the environment.

The term "pesticide" includes insecticides, herbicides, rodenticides, and fungicides.

This school district is establishing a registry of people who wish to be notified prior to unscheduled pesticide applications. The regular schedule is the second Monday of each month.

To be included in this registry, please complete the attached form and submit it to the Superintendent's office at 100 South Union, Polo, IL.

***** ***** ***** ***** ***** ***** ***** *****

I would like to be notified two days before the use of pesticides at the school if it an unscheduled time other than the second Wednesday of each month. I understand that if there is an immediate threat to health or property that requires treatment before notification can be sent out, I will receive notification as soon as practicable.

Parent/Guardian

Name _____

Signature _____ **Date** _____

Student's Name _____

Grade _____

Address _____

Pest Sighting Report

The following report is to be filled out by custodians and staff when a pest has been sighted. The completed report should be placed in the designated area. Emergency situations should be reported to the office immediately.

| | |
|---|--|
| PEST SIGHTING REPORT | |
| Description of Pest seen or sample if available | |
| Number of pests seen | |
| Exact location where pest was seen | |
| Time & Date of sighting | |
| Name of person making report | |

| | |
|---|--|
| PEST SIGHTING REPORT | |
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| Number of pests seen | |
| Exact location where pest was seen | |
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| | |
|-----------------------------|--|
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|-----------------------------|--|

| | |
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| Description of Pest seen or sample if available | |
| Number of pests seen | |
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| | |
|---|--|
| PEST SIGHTING REPORT | |
| Description of Pest seen or sample if available | |
| Number of pests seen | |
| Exact location where pest was seen | |
| Time & Date of sighting | |
| Name of person making report | |

I.P.M. INSPECTION REPORT

To be completed by the Pest Control Operator

School: _____

Date: _____

| Areas Inspected | Pest Found | Measures Taken | Chemical /Amount Used |
|-----------------|------------|----------------|-----------------------|
| Kitchen | | | |

| | | | |
|-------------------------------|--|--|--|
| Food Storage | | | |
| Rest Rooms | | | |
| Locker Rooms | | | |
| Classrooms | | | |
| Hallways | | | |
| Common Areas | | | |
| Break Areas | | | |
| Utility Rooms/Janitors Closet | | | |

Any Area Pest Sighting Not Already Listed:

Areas that need attention:

Report given to: _____ Date: _____

Pest Control Operator _____ License # _____