

PESTICIDE USE ON SCHOOL CAMPUSES

Pesticide Risks to Children

The use of pesticides and chemicals have become increasingly common in our schools to deal with such problems as pests and weeds. Many of the pesticides currently in use in our society pose risks to human health and the environment, with special risks to children. Some pesticides cause adverse health effects in humans such as cancer, neurologic disruption, birth defects, genetic alteration, reproductive harm, immune system dysfunction, endocrine dysfunction, and acute poisoning. It is therefore incumbent upon the school district to have a policy and procedures for using pesticides and managing pests on school campuses in a manner which is safe for human beings, especially children.

It is the goal of the District to provide for the safest and lowest risk approach to control pest problems while protecting people, the environment, and property.

District personnel have investigated the appropriate use of pesticides on school campuses, if any, with other school districts, pesticide experts, toxicology experts, environmental experts, and parents. The purpose of such research was to determine how the District should deal with the problem of using pesticides on school campuses and maintaining children's health and safety at those schools. In doing so the District concludes that the best approach to use of pesticides on school campuses is through Integrated Pest Management (IPM).

Integrated Pest Management

Integrated Pest Management is an objective, problem solving process which takes much of the guess work out of pest management. With IPM pests are monitored by regular and careful inspections, during which the conditions contributing to pest problems are identified. This information is used to determine what actions are necessary, if any, based on the biology and habits of the pests involved to control those pests. IPM is based on what is referred to as the "Precautionary Principle" of pest management. That principle has two aspects: (1) No pesticide is free from risk or threat to human health, and (2) Pesticide manufacturers should be required to demonstrate that their products are safe for use around children, rather than requiring that government or the public demonstrate that human health is harmed by a particular pesticide.

Currently it appears that full implementation of the precautionary principle is not possible, and may not be for some time to come. However, the District is committed through the process set forth in the accompanying Administrative Regulation to implement IPM and the Precautionary Principle to the full extent deemed possible by the IPM Committee.

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BP 3514.11(b)

Pest Management Objectives

It is the District's goal to provide for the safest and lowest risk approach to control pest problems while protecting people, the environment, and property. The District will implement IPM aiming at long-term prevention of pest problems and will give non-chemical methods first consideration when selecting appropriate pest control techniques.

Legal References:

*(Cf. BP 3514--Environmental Safety
cf. BP 3414.1--Hazardous Substances
cf. BP 4119.43--Universal Precautions
cf. BP 4147--Employee Safety
cf. BP 5142--Student Safety)*

**Policy
Adopted:**

**Ventura Unified School District
Ventura, California**

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Integrated Pest Management

The District's implementation of Integrated Pest Management has four aspects to it: (1) training, (2) decision making, (3) implementation, and (4) annual reporting to the Board of Education.

Definitions

Integrated Pest Management (IPM) is a decision making process by which decisions are made regarding when and under what circumstances pesticides or alternatives to pesticides at the various school sites.

IPM Coordinator The IPM Coordinator shall be a District classified employee appointed by the Superintendent or his designee. The IPM Coordinator and the Pest Management Committee shall be trained in the principles of low risk IPM, safe application of pesticides, and alternatives to pesticide use at schools.

The IPM Coordinator shall be responsible for implementation of this Administrative Regulation, as well as the accompanying Board Policy. Such responsibility shall include, but not be limited to, the following:

1. Making decisions on pesticide use in the District in accordance with the District Approved Pesticide List.
2. Prior to the first meeting of the Committee, making decisions on pesticide use within the District in accordance with this Administrative Regulation.
3. Organizing and chairing IPM Committee meetings.
4. Arranging the taking notes at IPM Committee meetings and distributing those notes to people required by this regulation.
5. Maintaining the Approved List for pesticide use in the District.
6. Serving as a resource within the District to discuss the District IPM program with employees and the public.
7. Communicating with site administrators regarding their responsibilities in implementing the IPM program.
8. Coordinating training programs for school district staff.

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9. Tracking and documenting pesticide use at school sites and ensuring that such documentation is available to the public.
10. Coordinating school district efforts to adopt IPM techniques.
11. Presenting an annual report to the School Board evaluating the progress of the IPM program.
12. Seeing to it that this Administrative Regulation is given to all outside individuals or firms which will do pesticide application at any school site, and seeing to it that both this regulation and the Approved List are made a part of the service contracts with such individuals or firms.
13. Provide existing outside contractors who spray pesticides at school sites with the Approved Pesticide List whenever that list is compiled and whenever changes are made to the list.
14. See to it that those persons in charge of designing new school construction, reconstruction, or replacement of fences in the District, consider alternative designs for fencing, entrances, kitchens, and landscaping which would make IPM pest and weed management more feasible.
15. Maintain a list of chemically sensitive individuals and parents or staff wishing to be notified in advance of pesticide application at their school sites, and provide such prior notice as set forth below.
16. In addition, the IPM Coordinator shall maintain current knowledge in the matters of pesticide use at schools and Integrated Pest Management through readings, journals, newsletters, and inservice opportunities.

Pest Management Committee The Pest Management Committee (Committee) shall also be responsible for implementation of this administrative regulation and accompanying Board Policy and shall determine what pesticides shall be on the District Approved Pesticide List. The Committee shall also investigate lowest risk methods of pest control and explore their feasibility for implementation in the District.

The Committee shall have voting and non-voting members. The non-voting members shall be on the Committee for one year terms. Their purpose will be to be educated in IPM and provide input to the Committee. The voting members of the Committee shall be comprised of two parents appointed by the District Parent

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Advisory Committee, the IPM Coordinator, a District Food Services employee, and District employee appointed by the Superintendent or his designee. The non-voting members of the Committee shall be District employees who shall be appointed by the Superintendent or his designee. The IPM Coordinator shall be appointed by the Superintendent or his designee. The Child Nutrition Service employee shall be the Director of Child Nutrition Services or his designee.

Approved Pesticide List The IPM Coordinator shall maintain a list of all pesticides which the Committee has approved for use in the schools, along with any restrictions for such use. This list shall be referred to as the Approved Pesticide List. The Approved List shall not include any products listed in the Product and Use Approval portion of this regulation. The Approved List shall include, but not be limited to insecticide or rodenticide baits and traps; caulking agents and crack sealants; borates, silicates, and diatomaceous earth; soap-based products; products on the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) 25(b) list [40 C.F.R. § 152.25(g)(1)] or the California Certified Organic Farmers organic list; eryogenics, electronic products, heat, and lights; biological controls such as parasites and predators; microbial pesticides; insect growth regulators; and physical barriers.

Exemptions School district staff may request permission from the Committee to use pesticides that are banned under the provisions of this policy or are not on the Approved Pesticide List. Exemptions to the policy may be given for pesticides for limited uses, for a limited time, based on staff documenting: (1) the nature of the pest problem; (2) a description of the alternative methods explored to solve the problem, as well as results with such alternatives; (3) an explanation why the banned product should be used.

Training

All members of the Pest Management Committee shall receive training in low risk IPM, and alternatives to pesticide use. The IPM Coordinator shall be responsible for organizing and/or providing such training on an annual basis. From time to time experts on pesticides, IPM, and alternatives shall be brought in as consultants to provide the training.

Within a month of the first Committee meeting, the Superintendent shall inform all school principals of this Administrative Regulation and the accompanying Board Policy, and inform principals of their responsibilities under the regulations and policy. Such responsibilities will include communicating to all employees at

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least once a year, orally and through staff handbooks, that no pesticides may be used at school sites, except in accordance with this regulation and policy. Staff will not be permitted to do their own pesticide spraying.

Decision Making

Authority Until the first Committee meeting, the IPM Coordinator shall, in consultation with an IPM expert, make all decisions in the District regarding the use of pesticides at school sites, including but not limited to identification of pesticides which may or may not be used and how those pesticides may be used, so long as such decisions are in accordance with the law. After the first Committee meeting, the IPM Coordinator shall make pesticide use decisions consistent with the District Approved List. The IPM Coordinator shall keep a record of all pesticide use in the District as set forth below.

The Committee shall be responsible for voting on and compiling the District Approved Pesticide List.

Voting/Meeting Notice Committee decisions shall be made by a simple majority vote of Committee members present at a meeting. Notice of meetings shall be given to Committee members as far in advance as possible. No decision may be made by the Committee unless at least three members are present. The Brown Act shall not apply to Committee Meetings. Members of the public may be admitted to such meetings.

Selection of Committee Members/Meetings Committee members shall be appointed within forty-five (45) calendar days of the passage of this policy. The initial meeting of the Committee shall be attended by all members and convened within thirty (30) calendar days of the Committee members' appointment. The Committee shall meet bimonthly during the first year of its operation. At its sixth bimonthly meeting it shall then establish a regular schedule of future meetings, which may be amended from time to time, based on its experience of when Committee meetings are necessary. In addition, the Committee shall meet whenever a Committee meeting is "required." A Pest Management Committee meeting is "required" when either the IPM Coordinator, two members of the Committee, or a majority of the parents on the District's Parent's Advisory Committee determines that a meeting is required.

Meeting Minutes The IPM Coordinator, or his designee at each meeting, shall record minutes of all matters discussed at each meeting, as well as all decisions that are reached. These minutes shall be put into typed form by the IPM Coordinator and distributed to each Committee member, each school site

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custodian and principal, the Superintendent, the Assistant Superintendent of Business Services, the Risk Manager, and Board members. These minutes shall be made available to the public through the Superintendent's Office.

Product and Use Approval

Effective immediately, the School District shall not use any Toxicity Category I or II products. The district shall not use any pesticide identified by the State of California known to cause cancer or reproductive harm pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop. 65) or any pesticide identified as a known probable or possible carcinogen by the United States Environmental Protection Agency (U.S. E.P.A. carcinogenicity categories A, B, and C), Office of Prevention, Pesticides and Toxic Substances. Nor shall the District introduce any new pesticide that is a neurotoxin or endocrine disrupter. It is the District's goal to eliminate the use of neurotoxins and endocrine disruptors. Therefore, within six months of the first Committee meeting, the District shall eliminate the use of pesticides that are neurotoxins or endocrine disruptors.

The Committee shall investigate, research, and review safer, low-risk alternative methods of pest and weed control for all pesticides currently in use, including Round-Up, Tempo, Catalyst, and Dursban. When the Committee approves of the use of a particular product for pest control or weed abatement, the Committee minutes shall so note and such products will be put onto the Committee's Approved Pesticide List.

Implementation

Purchasing The District shall only purchase pesticide products which are on the District Approved Pesticide List unless the exemption process set forth above is followed.

Storage All pesticides shall be stored in a manner consistent with manufacturer recommendations and in a location away from children, behind locked doors, where children are not allowed.

IPM Methodology The following is the preferred order by which the Committee shall implement IPM methodology:

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1. Establish area pest management objectives, e.g., kitchens, playgrounds, classrooms, etc.
2. Establish pest action threshold levels.
3. Initiate behavioral modification, including improved sanitation.
4. Utilize pest prevention methods, such as structural modification, and/or employ progressive nonchemical methods and techniques, including pest monitoring and trapping.
5. Employ reduced risk progressive pesticide selection as a penultimate resort.
6. Following the exemption process.

Pesticide Application No pesticide shall be used at a District school site unless that pesticide is on the Approved Pesticide List. The only exception to this rule is if the exemption process set forth above is followed.

No employee of the District shall apply pesticides on any District school campus unless that person has a pesticide applicator license or makes such application under the supervision of a person with a pesticide applicator license.

Notification of Pesticide Use After the first Committee meeting, the District shall notify parents, teachers, and students of all pesticide applications at their relative school sites wherein pesticides not on the Approved Pesticide List will be used. Such notification shall include: (1) A written notice will be mailed to families or delivered to students at least 72 hours prior to any application; and (2) A sign shall be posted around the area where pesticides will be applied at least 72 hours before and after any pesticide application. The sign shall include the name and active ingredient of the pesticide, the target pest, the date of pesticide use, the signal word indicating the toxicity category of the pesticide, and a contact for more information.

Identification and Notification of Sensitive Individuals The school district will maintain a registry of chemically sensitive students, staff, or others requesting special consideration in the event of the use of pesticides. The district will provide personal notification to these individuals two weeks prior to any planned pesticide use.

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Outside Applicators If an outside individual or firm is employed to apply pesticides at any school site, that outside individual or firm shall be given copies of the Approved List, and shall make any pesticide application in accordance with that list and this Administrative Regulation. The IPM Coordinator shall be responsible for seeing to it that this Administrative Regulation is also given to the outside individual or firm, and both this regulation and the Approved List are made a part of the service contract with that individual or firm. Outside applicators shall be knowledgeable in the principles of IPM and willing to work within this Administrative Regulation at the Approved List.

Within thirty days of the enactment of this policy, the IPM Coordinator shall provide any outside contractors who do pesticide spraying for the District that such spraying must be done in accordance with this Administrative Regulation. The IPM Coordinator will provide such contractors with the Approved Pesticide List whenever that list is compiled and whenever changes are made to that list. No outside person shall apply pesticides on any District school campus unless that person has a pesticide applicator license.

Record keeping of Pesticide Applications The IPM Coordinator shall keep records of each pesticide application. Such records shall be Public Records, available for inspection by the public. Each application record shall include the following information:

1. Pest surveillance data sheets that record the number of pests or other indicators or pest populations that verify the need for treatments.
2. Material Safety Data Sheets (MSDS) on all materials used at the site. These will be maintained in the Principal's Office and will be available to staff and public.
3. The type and quantity of the pesticide used.
4. The site of the pesticide application.
5. The date the pesticide was used.
6. The name of the pesticide applicator.

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Design of New Schools The IPM Coordinator shall see to it that those persons in charge of designing new school construction, reconstruction, or replacement of fences in the District, consider alternative designs for fencing, entrances, kitchens, and landscaping which would make IPM pest and weed management more feasible.

Annual Reporting to the Board of Education

The IPM Coordinator shall report to the Board of Education on an annual basis, beginning one year after the first Committee meeting. Such a report shall occur at a regularly scheduled Board Meeting and shall give an overview of the amount and frequency of pesticide use at District school sites, as well as successes and any problems the District is having in implementing the IPM policy, as well as proposed solutions for any problems.

Networking

The IPM Coordinator shall be encouraged to network with IPM coordinators from other school districts, experts on IPM programs and pesticide use, and members of the public in the District concerned about the District's IPM program.

cf. BP 3514--Environmental Safety
cf. BP 3414.1--Hazardous Substances
cf. BP 4119.43--Universal Precautions
cf. BP 4147--Employee Safety
cf. BP 5142--Student Safety)

RESOURCES and NETWORKING:

Alliance of Schools for Cooperative Insurance Programs, Loss Control Safety Office (562) 403-4640, Richard Samms

Baefsky & Associates (925) 254-7950, Michael Baefsky

California Environmental Protection Agency Department of Pesticide Regulation (916) 324-4254 , Lynn Hawkins

www.cdpr.ca.gov.us

City of Santa Monica, Environmental Programs Division (310) 458-2255, Sandra Schubert

International Pest Management Institute (510) 776-7782, Bill Currie

IPM Practitioner, Berkely, CA (510) 524-2567

Business and Noninstructional Operations

AR 3514.11(i)

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Los Angeles Unified School District, Office of Environmental Health and Safety
(213) 743-5086, Gary Pons and Rick Hicks

Professional Association of Pesticide Applicators (415) 831-3536, Judy
Letterman; (909) 590-8744, Charlotte Carson

Rincon Vitova Insectaries (805) 643-5407, Jan Dietrich

Safe 2 Use (909) 372-9850, Linda Jensen Pascarella

San Diego Unified School District, Pest Control Supervisor (619) 293-8418, Ray
Palmer

Santa Barbara Community Environmental Council Organic Consulting Services
(805) 963-0583, Karen Feeney

Self Insured Schools of California (661) 636-4608, Katherine Jones

Ventura County Agricultural Commission (805) 933-3165

Ventura County Schools Self-Funding Authority Risk Management (805) 383-
1970, Brett Bretton

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