Integrated Pest Management Plan for Cornerstone Christian School

IPM Coordinator
Cornerstone Christian School, Lakeview, Oregon

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I. INTRODUCTION

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of Cornerstone Christian School (CCS) to approach pest management with the least possible risk to students and staff. In addition, ORS 634.700 – 634.750 requires all schools to implement integrated pest management. For this reason, the First Baptist Church Elder Board adopts this integrated pest management plan for use at our school.

II. WHAT IS INTEGRATED PEST MANAGEMENT?

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

IPM Basics

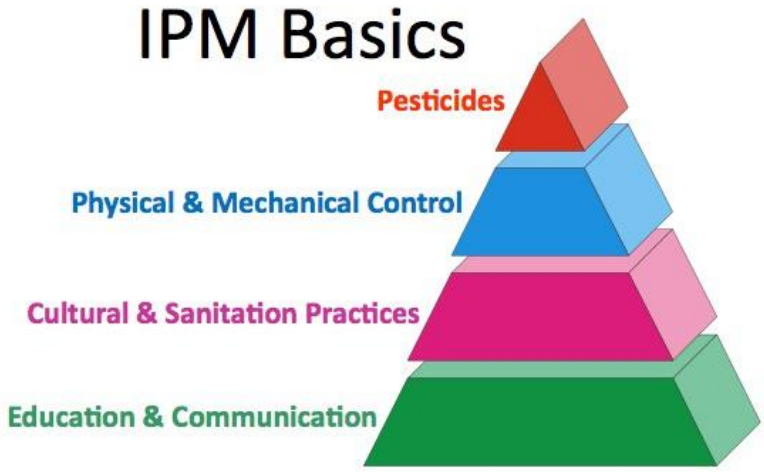
Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest-conducive conditions and a record of what action was taken is the most important part of an effective IPM program*.

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes can have significant effects on reducing pests. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from building, proper irrigation and mowing are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary. By focusing primarily

on the other basics, IPM results in a continual, sustainable, and long-term reduction or elimination of pesticides.



III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?

ORS 634.700 defines an IPM plan as a proactive strategy that:

(A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:
a) Protect the health and safety of students, staff and faculty;
b) Protect the integrity of campus buildings and grounds;
c) Maintain a productive learning environment; and
d) Protect local ecosystem health;

(B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

(C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

(D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

(E) Evaluates the need for pest control by identifying acceptable pest population density levels;

(F) Monitors and evaluates the effectiveness of pest control measures;

(G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;

(H) Excludes the application of pesticides for purely aesthetic purposes;

(I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;

(J) Gives preference to the use of nonchemical pest control measures;

(K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and

(L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for CCS's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for CCS.

Note: As mentioned in (G) above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, we will not set out any pesticidal baits for ants, cockroaches, or any other pests until first:

1) Informing staff in the area where the pests are that sanitation and exclusion are the primary means to control the pest.

2) Cleaning up any food debris in the area so pests eat the bait instead of the food debris.

3) Sealing up any cracks or crevices where we know the pests are coming from.

IV. IPM PLAN COORDINATOR RESPONSIBILITIES

The First Baptist Church Elder Board designates the Office Manager as the IPM Plan Coordinator (also known as the IPM coordinator). The IPM coordinator is key to successful IPM implementation in CCS, and is given the responsibility and authority for overall implementation and evaluation of this plan. The IPM coordinator is responsible for:

A. Annual IPM Coordinator Training

ORS 634.720 requires IPM Plan Coordinators to complete six hours of training each

year, which includes a general review of IPM principles and the requirements of ORS 634.700 – 634.750. The training our IPM coordinator attends will include hands-on inspection and assessment of real-world pest situations, pest prevention, exclusion, and management strategies for common pests.

B. Pest Prevention

Pest prevention includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage (see ORS 634.700 (D) above). The IPM coordinator will conduct thorough annual inspections and assessments of school property to find signs of pests and pest-conducive conditions, using one of the IPM inspection forms.

The IPM coordinator will also conduct inspections and assessments as needed when school staff report pest problems (signs of pests or pest-conducive conditions).

The IPM coordinator will work with school staff to assure clutter and food in classrooms are reduced, pest entry points are sealed up, external door sweeps are in good repair, and other pest prevention measures as needed.

C. Pest Management

The IPM coordinator will conduct or oversee actions when pests or signs of pests are found, which can include snap trapping for indoor and outdoor rodents, vacuuming or removal of nests, and other actions. The coordinator has the responsibility and authority over all contracted pest control services. **No pesticides of any kind may be applied by anyone unless approved by the IPM coordinator** (see “Definition of a Pesticide” under “VII Pesticides” section).

D. Outreach and Education to School Staff and Community

ORS 634.700 (3) (i) requires staff education “about sanitation, monitoring and inspection and about pest control measures”. The IPM plan coordinator will be responsible for conducting this education. The IPM coordinator will give new staff a copy of this IPM plan; and an overview of pest prevention, pest inspections, past or current pest issues and pest control measures. The coordinator will also give a brief “IPM tour” of the campus to illustrate how pest prevention and monitoring happens at the school.

Other outreach and education will be provided as the IPM coordinator determines is necessary when pest issues arise.

ORS 634.705 (1) (e) requires our governing body to adopt provisions for “Providing a process for responding to inquiries and complaints about noncompliance with the integrated pest management plan”. The IPM plan coordinator will respond to all inquiries and complaints in writing or in person. Records of the responses will be kept on file at the school.

E. Outside Contractors (Landscape, Pest Control Company)

The IPM plan coordinator has the responsibility and authority over all contracted landscape companies and pest control companies, and no pesticides of any kind may be applied by these companies unless approved by the IPM plan coordinator. The coordinator will require any contractor to have and read a copy of this IPM plan, as well as other documents as described in section VII. PESTICIDES.

V. SCHOOL STAFF ROLES AND RESPONSIBILITIES

A. Education

ORS 634.700 (3) (i) requires staff education "about sanitation, monitoring and inspection and about pest control measures". New staff are required to participate in training and orientation from the IPM coordinator which includes these elements. All other staff are required to attend training and read materials when the IPM coordinator determines this is necessary.

B. Pest Prevention

Following education and guidance from the IPM coordinator, staff and grounds managers will assure that they:

- Engage children to clean up after snacks or meals
- Immediately clean up spilled food
- Store food items in plastic tubs with lids or similar
- Keep in, on, under, and around microwave oven clean and free of food debris
- Keep vegetation (including tree branches and bushes) at least 24 inches from building
- Avoid long-term storage or use of cardboard boxes
- Keep classrooms and work areas free of clutter
- Remove recycled products from the building on a daily basis
- Keep outside kitchen doors closed at all times (except during deliveries and emptying trash)
- Seal up holes and gaps around penetrations that allow pests access into buildings
- Keep dumpster or outdoor trash bins far from building.

C. Pest Reporting

Report to the IPM Coordinator via email, text, or verbally.

- Report pests and signs of pests.

- Report pest-conducive conditions such as leaky faucets, standing water, ripped window screens, damaged door sweeps, garbage bins not emptied, food not stored in plastic tubs with lids, clutter, bushes touching buildings.

VI. IPM PROCESS

A. Monitoring and Inspecting

OR 634.700 (3) (d) states that an IPM plan "Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage". Our IPM plan coordinator will conduct annual inspections as described in the "Pest Prevention" section on page 6, as well as "on-demand" inspections when staff report signs of pests or pest-conducive conditions.

OR 634.700 (3) (e) states that an IPM plan "Evaluates the need for pest control by identifying acceptable pest population density levels". This is referring to thresholds for pests. A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for pests of public health significance such as cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Coordinator and staff, as needed.

All staff will be responsible for reporting to the IPM coordinator any pest-conducive conditions they discover during their daily activities. Pest-conducive conditions are conditions that provide food, water, and/or shelter for pests.

B. Pest Prevention (Reducing Access to Food, Water, Shelter)

The most important part of pest prevention is removing pest-conducive conditions as soon as they are discovered. It is important to remove or report pest-conducive conditions as soon as they are found.

Specific pest prevention practices are given under the **SCHOOL STAFF ROLES AND RESPONSIBILITIES** section on page 7.

Basic pest prevention resources can be found at the "Resources & Forms" page at the OSU School IPM Program's website **osuipm.org**:
-Pest-proofing Before School Break
-Food in the Classroom

C. Weed Prevention (Proper Mowing, Fertilization and Irrigation)

The three main cultural practices to prevent weeds on grassy areas are proper mowing, fertilization, and irrigation. The person responsible for our grassy areas will follow guidance from the mowing (9:54 mins), fertilization (5:52 mins), and irrigation (6:22 mins) videos located on the "Turf" page of the OSU School IPM Program's website **osuipm.org**

D. Pest Management (When Pests are Found)

When pests are found, every effort will be taken to find out what caused them to be there, and eliminate the cause as well as the pest.

Pests and pest situations vary significantly, as do management practices. Our IPM plan coordinator will lead the management of pests that are found, following what is learned at annual school IPM coordinator training, as well as supportive resources materials provided at the training and at the "Pests" page of the OSU School IPM Program's website **osuipm.org**

Pest management actions will be documented in our Pest Logs. If pesticides are used, the IPM coordinator will assure that all actions are documented as described in the **PESTICIDES** Section below.

If the IPM plan coordinator decides to hire a pest control company to manage pests that are found, we will follow guidance from the first four pages of "Hiring an Outside Contractor", which can be found at the "Resources & Forms" page of the OSU School IPM Program's website **osuipm.org**

VII. PESTICIDES

A. Hiring a Pest Control Company or Landscape Company

The IPM plan coordinator has the responsibility and authority over all contracted landscape companies and pest control companies, and no pesticides of any kind may be applied by these unless approved by the IPM plan coordinator. The coordinator will require any contractor and their employees who conduct work at our school to have and read a copy of this IPM plan, as well as the following documents located on the "Pesticides" page of the OSU School IPM Program website **osuipm.org**:

-Low Impact Pesticides List
-ODA Pesticide Application Recordkeeping Forms
-ODA Checklist for Contracted Pesticide Applicators
-Declaring a Pest Emergency
-Notification, Posting, Record-Keeping Requirements

B. Definition of a Pesticide

IT IS IMPORTANT TO REMEMBER THAT ant bait, mouse bait, insect repellant, weed killer, and aerosol 'bug' killers that you can buy over the counter at supermarkets and hardware stores are pesticides, and it is illegal to apply them at schools without a pesticide applicators license.

ORS 634.006 (8) has a lengthy definition of a pesticide. Some key parts of the definition include:

(c) "Fungicide" which means any substance or mixture of substances intended for preventing, destroying, or mitigating any fungus;

(d) “Herbicide” which means any substance or mixture of substances intended for preventing, destroying, or mitigating any weed;

(e) “Insecticide” which means any substance or mixture of substances intended for preventing, destroying, or mitigating any insects which may be present in any environment whatsoever;

(h) Any substance, or mixture of substances intended to be used for defoliating plants or for preventing, destroying, repelling or mitigating all insects pant fungi weeds, rodents, predatory animals or any other form of plant or animal life which is, or which the department declares to be a pest, which may infest or be detrimental to vegetation, humans, animals, or be present in any environment thereof

C. Low-Impact Pesticide List

Here is text from ORS 634.705 (5):

A governing body shall adopt a list of low-impact pesticides for use with the integrated pest management plan. The governing body may include any product on the list except products that:

(a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;

(b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or

(c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

Our governing body adopts the Low-Impact Pesticides List located on the “Pesticides” page of the OSU School IPM Program’s website **osuipm.org**.

Note: For any pesticide we may be considering to add to our adopted list, we will follow the “ODA Guidance on Low-Impact Pesticides” document at the “Pesticides” page of the OSU School IPM Program’s website **osuipm.org** before making any decision.

D. Pesticide Applications

Any pesticide application must be made by a licensed pesticide applicator.

Among other things, ORS 634.700 defines an IPM Plan as a proactive strategy that:

"Monitors and evaluates the effectiveness of pest control measures" (ORS 634.700 (F))

"Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests." (ORS 634.700 (G))

"Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective" (ORS 634.700 (K))

Pest prevention and non-pesticidal control options are our first and primary means for managing pests.

To avoid a proliferation of pests and/or unnecessary applications of pesticides, **we will not set out any pesticidal baits for ants, cockroaches, or any other pests without first**:

1) Informing staff in the area where the pests are that sanitation and exclusion are the primary means to control the pest.
2) Cleaning up any food debris in the area so pests eat the bait instead of the food debris.
3) Sealing up any cracks or crevices where we know the pests are coming from.

WHEN THE IPM PLAN COORDINATOR DECIDES THAT A PESTICIDE WILL BE APPLIED:

1) **We are required by law to give written notice** of a proposed application to "parents and guardians of minor students, school administrators, faculty members and staff members". We will carry out this requirement by a notification form written by the IPM Coordinator.

2) **We are required by law to place warning signs around pesticide application areas**
Warning signs will be placed at the front gate and front door of the school, and will contain the following information:
    - Date/Time
    - Date of reentry if necessary
    - What pesticide was applied and for what reason

3) **We are required by law to keep records of pesticide applications**
We will use one of the recordkeeping forms created by the Oregon Department of Agriculture Pesticides Program for this purpose. The "ODA Pesticide

Application Recordkeeping Forms" templates can be found at the "Pesticide" page on the OSU School IPM Program website **osuipm.org**

4) **We are required by law to monitor and evaluate the effectiveness of pest control measures**
   The pesticide applicator and the IPM coordinator will return to the application site at a time/date jointly decided upon, to observe and determine the effectiveness of the application.

5) **There are special circumstances where a "pest emergency" may be declared.** The IPM coordinator and the pesticide applicator will follow the guidance document "Declaring a Pest Emergency", located on the "Pesticide" page of the OSU School IPM Program website **osuipm.org**.

NOTE: Documentation of 1 – 5 above will be kept on file at the First Baptist Church Office.