

**Community Action Head Start
Integrated Pest Management (IPM) Plan**

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**Community Action Head Start
INTEGRATED PEST MANAGEMENT (IPM) PLAN
1001 SW Baseline Street
Hillsboro, OR 97123**

I. INTRODUCTION

In compliance with ORS 634.700-634.750, Community Action Head Start has prepared the following integrated pest management plan. The pesticides used to remediate pests can pose health risks to people, animals, and the environment. 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 priority – and a prerequisite to learning – it is the policy of Community Action Head Start to approach pest management with the least possible risk to students and staff.

This plan describes the pest management practices for Community Action Head Start and clearly states the pesticide use policies. A copy of the plan will be made available to the public upon request.

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 used only when necessary.

IPM Basics

Education & 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 in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas 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.

III. SCHOOL IPM PLAN COORDINATOR

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Community Action Organization has a contract with Guaranteed Pest Control Service Company which will provide a licensed pesticide applicator to perform regular inspections and apply pesticides when it is deemed necessary. The IPM Coordinator, in conjunction with the pesticide company, is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for the following:

- A. Attending six hours of IPM training each year
Note: ORS 634.720 requires IPM plan coordinators to complete six hours of training each year.
- B. Conducting outreach to the school community (staff and parents) about the school's IPM plan
- C. Communicate about IPM within schools about IPM practices
- D. Assuring that the decision-making process for implementing IPM in the facilities is followed
- E. Assuring that all notification, posting, and record-keeping requirements are met when the decision to make a pesticide application is made
- F. Maintaining the approved pesticides list
- G. Responding to inquiries and complaints about noncompliance with the plan

IV. EDUCATION AND TRAINING OF STAFF

Note: ORS 634.700 (3) (i) requires staff education "about sanitation, monitoring and inspection and about pest control measures". All staff should have at least a general review of IPM principles and strategy.

- The IPM coordinator will have information regarding proper pest management and IPM plans.
- The IPM Coordinator will give training to staff on an overview of pest control measures.
- Guaranteed Pest Control Service Company will be available for additional questions and can give training as needed.
- Annually, The IPM Coordinator, in conjunction with Guaranteed Pest Control Service Company will re-evaluate the IPM plan for Community Action Head Start and go over any new plans for the upcoming year.
- Staff will ensure that children eat meals at designated areas only. All food is to be put away at night. All water is to be mopped up and all eating, and food service areas cleaned with soap and water.

V. IPM PROCESS

A. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always written down. As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.

1. **Monitoring & Reporting – All Staff:** After a brief (15 – 20 minute) training by the IPM Coordinator (or designee) on pests and pest-conducive conditions, staff will be expected to report pests or pest-conducive conditions they observe during the normal course of their daily work. Reporting will be done verbally or by email. Head Start staff in Public Schools will report pests or pest-conducive conditions to the school and to the Head Start IPM Coordinator. When Head Start staff are made aware of a pesticide application at a public-school site, staff must contact the IPM Coordinator for notification to be made to parents at that site.
2. **Monitoring & Reporting – Custodial/Maintenance Staff:** During the normal course of their daily work, the custodial/maintenance staff will monitor structures and building perimeters for:
 - a. Pest-conducive conditions inside and outside the building (holes that allow pests to enter, conditions that provide pest harborage).
 - b. The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
 - c. The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
 - d. Human behaviors that affect the pests (food preparation procedures, concessions procedures, classroom food, etc.)
3. **Monitoring & Reporting – Grounds Staff:** During normal daily activities, grounds staff will monitor for invasive weeds, gophers, moles, yellow jackets, and other outdoor pests. These will be reported to the Facilities Manager. The IPM Coordinator will be notified by the Facilities Coordinator.
4. **Sticky monitoring traps for insects:** Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence, their reproductive stage, the likely direction pests are coming from, and the number of pests. All staff will be made aware of the traps and their purpose, so they don't disturb them. The Pest Management Professional will be responsible for setting them out and checking them once per month and replacing them once every four months. Sticky monitoring traps will be placed in any "pest-vulnerable areas" the Pest Management Professional deems necessary. Kitchen sticky insect traps will be checked monthly.
5. **Reporting (pests, signs of pests, and conducive conditions):** When staff observe pests or pest-conducive conditions they should call or e-mail the IPM Coordinator. The IPM Coordinator will notify the Facilities Manager.
6. **Reporting "Pests of Concern":** "A pest of concern" is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches, mice & rats, yellow jackets, opossums, skunks (they can bite), and bed bugs. When pests of concern are observed, staff will contact the IPM Plan Coordinator immediately.
7. **Action**
 - a. **Structural:** Any items (such as sealing up holes) that custodial/maintenance staff observe that they can resolve should be taken care of and reported to IPM Coordinator. The Coordinator will keep records of these actions using Pest Logs. If the actions needed are not something that can be accomplished alone with minimal time, the IPM Coordinator and Facilities Manager will develop a plan of action with a proposed deadline for completion based on the severity of the risk or nuisance. The IPM Coordinator will keep records of actions taken/work performed and will keep records of time and money spent to manage pests.
 - b. **Grounds:** When pests on grounds reach a threshold established by the IPM Coordinator, action will be taken. The Grounds Crew or Coordinator will keep records of actions, time, and money spent to manage pests on grounds.

8. **Acceptable Thresholds:** A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks is 0. Acceptable thresholds for other pests will be determined by the Pest Management Professional, Facilities Manager and the IPM Coordinator.

B. Inspections

When pests are absent the monitoring schedule will consist of monthly inspections. When pests are present, Community Action Head Start has a monitoring schedule that consists of weekly inspections until the issue is resolved.

The following technique will be used to monitor for pests: The facility's contracted Pest Management Professional (Guaranteed Pest Control Service Company) will conduct regular pest inspections and will then inform the IPM Coordinator and Facilities Manager as to the proper course of action.

C. Pest Emergencies

IMPORTANT: If a pest emergency is declared, the area must be evacuated and made inaccessible before taking any other steps. When the IPM Plan Coordinator, after consultation with staff, determines that the presence of a pest or pests immediately threatens the health or safety of students or staff, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children. The IPM Coordinator will keep records of actions taken using Pest Logs.

D. Annual IPM Report (completed by IPM Plan Coordinator)

In January of each year, the IPM Plan Coordinator will provide the governing body an annual IPM report. The report will include a summary of data gathered from Pest Logs, or e-mails, or Coordinator notes, as well as costs for Pest Management Professionals and pesticides. Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be incorporated into the annual report of pesticide applications.

VI. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING

Any pesticide application on school property must be made by a licensed commercial or public pesticide applicator. At the beginning of each school year, all staff and parents will be informed of potential pesticide products that could be used if other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be provided to all the above via e-mail or hard copy to all Head Start staff and parents.

A. Notification and Posting for Non-emergencies

When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator.

Non-emergency pesticide applications may occur in or around a school before or after school is in session. If the labeling of a pesticide product specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of that reentry time.

The IPM Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients) at least 24 hours before the application occurs. The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator or Facilities Manager shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs. A warning sign must bear the words “Warning: pesticide-treated area” and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (IPM Coordinator and/or Facilities Manager).

B. Notification and Posting for Emergencies

Important Notes:

- 1) The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration.
- 2) If a pesticide is applied at a campus due to a pest emergency, the Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies and provide a written report of such to the governing body.
- 3) The governing body shall review and take formal action on any recommendations in the report. The declaration of the existence of a pest emergency is the only time a non-low-impact pesticide may be applied. If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs. The IPM Coordinator or designee shall place notification signs around the area as soon as possible. *Note: ORS 634.700 also allows the application of a non-low-impact pesticide “by, or at the direction or order of, a public health official”. If this occurs, every effort must be made to comply with notification and posting requirements above.*

C. Record Keeping of Pesticide Applications

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator:

- A copy of the label
- A copy of the SDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator’s license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The dates and times for the placement and removal of warning signs
- Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices

The above records will be kept on file at the school where the application occurred, and at the office of the IPM Plan Coordinator, for at least four years following the application date.

D. Annual Report of Pesticide Applications

In January of each year, the IPM Plan Coordinator will provide the governing body an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

- The brand name and USEPA registration number of the product applied
- The approximate amount and concentration of product applied
- The location of the application
- The prevention or management steps taken that proved to be ineffective and led to
- the decision to make a pesticide application
- The type of application and whether the application proved effective

VII. APPROVED LIST OF LOW-IMPACT PESTICIDES

The most current list of approved low-impact pesticides can be found at: The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at: 1.800.858.7378 or npic@ace.orst.edu

Note: All pesticides used must be used in strict accordance with label instructions. According to ORS 634.705 (5), the governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest management plan.