CRESWELL SCHOOL DISTRICT 40

ONE TEAM, ONE DREAM

Integrated Pest Management Plan

Adopted under ORS 634.700 – 634.750

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Based on the OSU School IPM Program Model Plan for Small Oregon School Districts

I. Introduction

Structural and landscape pests can pose significant problems in schools. In this plan, “pests” also includes unwanted vegetation such as weeds. Pests such as mice and cockroaches can trigger asthma, mice and rats carry disease, and many people, children especially, are allergic to yellow jacket stings. The pesticides used to manage these pests can also pose health risks to people, animals and the environment, and may pose special risks to children because their organ systems are still developing. Because Creswell School District (CSD) considers the health and safety of students, staff and patrons our first priority and a prerequisite to learning, it is the policy of the District to approach pest management with the least possible risk to everyone who visits our campuses. Senate Bill 637 (2009), codified at ORS 634.700 through 634.750, requires all school districts to implement integrated pest management. For this reason, the Creswell School District Board of Directors adopts this Integrated Pest Management Plan for use at Creswell Elementary School, Creswell Middle School, Creswell High School, and all District grounds, athletic fields and support facilities. This plan replaces the District’s 2012 IPM Plan.

II. What Is Integrated Pest Management?

Integrated Pest Management (IPM) is a proactive, long-term strategy for environmentally sound pest suppression through a wide variety of tactics. It protects the health and safety of students, staff, visitors and patrons, maintains a positive learning environment, and protects District structures and grounds. Control strategies focus on reducing the food, water, shelter and access pests use to establish, feed, breed and multiply. Because IPM addresses the reasons pests are present, pesticides are used rarely, only when necessary, and only after other measures have failed.

IPM Basics

Education and Communication. Effective IPM begins with knowing what conditions cause pest problems, how to monitor for pests, how to identify them, and how they behave. A protocol for reporting pests and pest-conducive conditions, with a written record of the action taken, is the most important part of the program.

Cultural and Sanitation. Human behavior can encourage pests, and small changes in habits have large

effects. Examples include cleaning under kitchen counters, food preparation surfaces and serving lines every day; reducing clutter in classrooms, staff rooms, custodial closets and storage areas; placing dumpsters as far from the kitchen door as practical; managing waste in and around athletic stadiums; and using sound turf practices such as irrigation, over-seeding, fertilizing, mulching and aeration.
Physical and Mechanical. Rodent traps, sticky monitoring traps for insects, door sweeps on exterior doors, sealing cracks and caulking holes under sinks, proper mulching and drainage, and keeping landscape plants 24 to 36 inches from buildings.
Pesticides. When prevention works, pesticides are the exception rather than the rule. They are used only after other measures have been considered and documented.

III. What Is an Integrated Pest Management Plan?

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

- Focuses on long-term prevention or suppression of pest problems through economically sound measures that protect the health and safety of students, staff and faculty; protect the integrity of campus buildings and grounds; maintain a productive learning environment; and protect local ecosystem health.
- Focuses on prevention by reducing or eliminating conditions of property construction, operation and maintenance that promote the establishment, feeding, breeding and proliferation of pests, or that create harborage for pests.
- Incorporates sanitation, structural remediation or habitat manipulation, and mechanical, biological and chemical control measures that present a reduced risk or have a low impact, and, to mitigate a declared pest emergency, the application of pesticides that are not low-impact pesticides.
- Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage.
- Evaluates the need for pest control by identifying acceptable pest population density levels.
- Monitors and evaluates the effectiveness of pest control measures.
- Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than pesticides designed to attract or be consumed by pests.
- Excludes the application of pesticides for purely aesthetic purposes.
- Includes school staff education about sanitation, monitoring and inspection, and about pest control measures.
- Gives preference to nonchemical pest control measures.
- Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective.
- 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.

This definition is the basis for the Creswell School District IPM Plan. The sections that follow set out how the District meets the requirements of ORS 634.700 through 634.750.

Baits designed to be consumed by pests

ORS 634.700 allows routine application of pesticides designed to be consumed by pests. To avoid unnecessary applications, the District will not set out ant or cockroach baits until it has:

- Informed staff in the affected area that sanitation and exclusion are the primary means of control.
- Established an acceptable population density for the pest.
- Cleaned up food debris in the area.
- Sealed cracks and crevices where the pests are known to enter.
- Set out sticky monitoring traps following the protocol in Section VI.
- Documented the steps taken and their results.

The product label and Safety Data Sheet (SDS) must be in the applicator's possession. The label is the law, and all of its requirements and cautions are strictly followed.

IV. District IPM Plan Coordinator

The Superintendent or designee shall serve as the Integrated Pest Management Plan Coordinator (IPMC). Under the direction of the Superintendent, the Coordinator has full authority to implement and evaluate all phases of this plan and is responsible for:

- **Training.** Completing at least six hours of IPM training each year, including a general review of IPM principles and the requirements of ORS 634.700 – 634.750, and hands-on training in exclusion, monitoring and inspection techniques, and management of common pests (ORS 634.720).
- **Outreach.** Educating the school community, including custodial, maintenance, construction, grounds, food service, teachers, administrators and District office staff, and providing the training described in Section V.
- **Prevention.** Overseeing prevention efforts such as sealing cracks and reducing clutter and food in classrooms. Communication with teachers goes through each building principal, and correction of any violation by teachers or educational assistants is carried out at the principal's direction.
- **Decision-making process.** Assuring the process in Section VI is followed, and continually assessing and improving the monitoring, reporting and action protocol.
- **Notification and records.** Assuring that all notification, posting and record-keeping requirements in Section VII are met and timelines kept.
- **Approved pesticide list.** Maintaining the list of low-impact pesticides in Section VIII.
- **Unapproved pesticides.** Confiscating any unapproved pesticide (such as aerosol sprays) brought into school buildings or onto school grounds and athletic fields, and notifying the principal and staff member involved.
- **Complaints.** Responding in writing to inquiries and complaints about noncompliance. The original complaint, the response and the action taken are kept on file.
- **Monitoring traps.** Placing and checking sticky insect monitoring traps, with custodial staff, as described in Section VI.
- **Pest records.** Keeping pest complaints and actions in Pest Logs through Incident IQ.
- **Construction and renovation.** Developing pest avoidance and prevention protocols for construction and renovation projects with the Maintenance/Grounds department. The Coordinator is involved in drafting bids and may halt a project if those protocols are not being met.
- **Inspections.** Conducting the inspections described in Section VI.B.

V. Responsibilities and Training of School Employees

ORS 634.700 requires staff education about sanitation, monitoring and inspection, and about pest

control measures. All staff receive at least a general review of IPM principles and the requirements of ORS 634.700 – 634.750 each year.

A. IPM Plan Coordinator

Training and responsibilities are described in Section IV.

B. Custodial and Maintenance Staff

Training. The Coordinator (or designee) ensures custodial staff complete IPM Training assigned at least annually on sanitation, monitoring, inspection and reporting, and trains maintenance staff on identifying pest-conducive conditions and mechanical controls such as door sweeps and sealing holes under sinks.
Responsibilities. Custodial and maintenance staff are responsible for:

- Complete assigned annual IPM training in Vector Training, SafeSchools.
- Monitoring for pest-conducive conditions during daily work and sealing small holes and cracks when they can be fixed quickly.
- Placing and checking sticky traps for crawling and flying insects and emailing the results to the Coordinator.
- Completing the IPM addendum to the quarterly building safety inspection and submitting it with the quarterly report.
- Reporting clutter and other problem areas in classrooms and other spaces to the Coordinator by email.
- Reporting cracks, holes or voids that need repair by District work order.
- Responding to building staff requests to look at pest problems and reporting them by work order.
- Reporting to the Coordinator teachers who repeatedly decline, or need help, to reduce clutter and other pest-conducive conditions.
- Reporting any unapproved pesticide found during inspections or regular duties so the Coordinator can confiscate it.
- Assisting the Coordinator in resolving issues from the annual inspection, and helping set a priority list with deadlines for exclusion work that cannot be done quickly.

C. Grounds Department

Training. The Grounds Lead (or designee) ensures staff complete IPM Training assigned at least annually. Before that training, the Grounds Lead meets with the Coordinator to review the annual report of pesticide applications and plans the session. Training reviews this plan, grounds responsibilities, pesticide application data, basic monitoring for common grounds pests. The Grounds Lead and staff meet with the Coordinator more than once a year to review practices, the approved product list, application schedules and any written complaints.
Responsibilities. Under the direction of the Coordinator, grounds staff are responsible for:

- Complete assigned annual IPM training in Vector Training, SafeSchools.
- Maintaining Oregon Department of Agriculture licensing as public pesticide applicators, including required continuing education.
- Reducing conditions conducive to weeds, gophers, moles, yellow jackets and other outdoor pests, and addressing structural concerns and grounds infestations.
- Keeping vegetation, including tree branches and shrubs, 24 to 36 inches from buildings where feasible.
- Proper mulching in landscaped areas, and proper fertilization, over-seeding, mowing height,

edging, drainage, aeration and irrigation scheduling in turf areas.
- Reporting conditions of concern to the Coordinator, who keeps a written record on file.
- Scheduling, posting and recording all pesticide applications on District grounds, under the direction of the Coordinator and following Section VII.

D. Food Service Staff

Training. The Coordinator (or designee) ensures food service staff complete training at least once a year on basic IPM principles and the responsibilities below.
Responsibilities. Food service staff are responsible for:

- Complete assigned annual IPM training in Vector Training, SafeSchools.
- Cleaning all food and food components (sugar, flour, etc.) from all surfaces every day.
- Keeping floors under serving counters, preparation tables and movable equipment free of food and drink debris.
- Promptly breaking down and removing cardboard from the building and avoiding long-term cardboard storage.
- Removing recycling daily and keeping all food items in sealed containers.
- Keeping exterior doors closed except during deliveries and trash removal.
- Keeping the main dumpster as far from the kitchen entrance as practical.
- Immediately reporting rodents or rodent droppings to the Coordinator, followed by an email for the record.
- Reporting pest-conducive conditions that need maintenance (leaky faucets, drains that need scrubbing, grease build-up, etc.). The Kitchen Manager submits a work order to the Coordinator for action or for the record.

E. Faculty: Teachers, Specialists and Educational Assistants

Training. The Coordinator (or designee) ensures staff complete annual training, scheduled with each, covering what pest-conducive conditions are and why timely reporting matters, keeping rooms free of clutter, and having students clean up after eating.
Responsibilities. Faculty are responsible for:

- Complete assigned annual IPM training in Vector Training, SafeSchools.
- Keeping classrooms and work areas free of clutter.
- Making sure students clean up after themselves whenever food or drink is consumed in the classroom.
- Reporting pests and pest-conducive conditions to the Coordinator by email, giving the room number or location, type of pest, times the space is available for inspection, and any suggested remedy. In an emergency, report by phone.
- Following the ant first-response protocol below before notifying the Coordinator.

Ant first-response protocol

For ants in a classroom, kitchen or sink area (custodial areas excluded), the staff member who finds them will clean up the food the ants are eating, remove the visible ants, and wipe the area down with soapy water. If ants are still present after following this protocol, the staff member emails the Coordinator describing what was done.

F. School Principals

Training. Same as faculty.
Responsibilities. Principals are responsible for:

- Scheduling time for staff to receive annual IPM training, and completing it.
- Assuring that teachers and staff keep rooms free of clutter and do not create pest-conducive conditions through food or other classroom practices.
- Directing correction of IPM violations by teachers and educational assistants.
- Assuring that staff, students and parents receive the annual notice of potential pesticide products described in Section VII.
- Forwarding each pesticide application notice from the Coordinator to faculty, parent club, site council, students, parents and others the administration considers part of the school community.

G. Other Staff and Students

Basic IPM training and the main points of this plan are also provided to school nurses, administrative staff, the Superintendent and other groups the District considers essential. Coaches who use athletic fields receive an overview of proper turf use and guidance on how to report concerns. All turf concerns should be sent to the Athletic Director for further review. All other staff keep their work areas free of clutter and report pests and pest-conducive conditions to the Coordinator. Students report pests to their teachers.

VI. IPM Process

A. Monitoring, Reporting and Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750 and the backbone of the District's IPM program. It is the regular, ongoing inspection of areas where pest problems do or might occur, and it gives the District current, accurate information for pest management decisions. Monitoring is built into staff members' normal duties, and everything observed is written down and filed with the Coordinator.

Levels of monitoring

- **Level 1:** casual observation with no record. This is generally not helpful.
- **Level 2 (all staff):** observation with written notes. Staff observe and identify pest-conducive conditions, notify the custodian, and email the Coordinator with their concerns and any first-response steps taken.
- **Level 3 (Coordinator, custodial and grounds leads):** structured inspection and recording, described below.

Monitoring by the Coordinator and custodial/maintenance staff

During normal daily work, the Coordinator and custodial/maintenance staff monitor structures and building perimeters for:

- Pest-conducive conditions inside and outside, including structural deterioration, entry holes and harborage.

- The level of sanitation, including waste disposal, food and food waste sold or brought on site, and cleanliness after community events, athletic events, students and patrons.
- The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes or dust, rotted wood, insects on sticky traps).
- Human behaviors that affect pests, such as doors and screens that cannot be kept closed, food preparation, concessions and classroom food.
- Their own management activities (caulking and sealing, cleaning, trapping, treatments) and the results.

Monitoring by grounds staff

The Grounds Lead and grounds staff monitor and record:

- Turf and landscape areas and the health of landscape plants and trees.
- The kind and abundance of pests, including weeds, insects, mites, moles, gophers, box elder bugs and pigeons, and beneficial organisms such as ladybugs, spiders, lacewing larvae and syrphid fly larvae.
- Unusual weather (hot, dry, wet or cold) that may affect growing conditions.
- Drainage problems and flooding.
- Human behaviors that affect plants or promote pests, such as foot traffic that compacts soil or physical damage to plants.
- Management activities such as pruning, mulching, fertilizing, aeration and treatments.
- Soil tests every three to four years for pH, phosphorus and potassium in turf areas.

Sticky monitoring traps for insects

Sticky traps are a diagnostic tool, not a control method. They show whether a pest is present, its life stage, the direction it is coming from and how many there are. All staff are told about the traps so they are not disturbed. The Coordinator and trained custodial staff place traps in kitchens and other pest-vulnerable areas, check them monthly (primarily for drain flies, ants and cockroaches), and replace them every four months.

Monitoring for mice

In addition to watching for signs of mice (droppings, gnawing, hair), snap traps are placed in kitchens and other areas the Coordinator considers necessary, and checked monthly.

Reporting

All CSD staff are reporters. Staff shall submit a district work order request. The best report comes directly from the person who saw the problem. A reporting form is available through Incident IQ, on the district website.

Pests of concern

A pest of concern is a pest that is a public health risk or a significant nuisance. These include cockroaches, mice and rats (disease vectors and asthma triggers), pigeons (disease vectors), yellow jackets and wasps (stings can cause anaphylaxis), cornered nutria, raccoons, cats, dogs, opossums and skunks (bites, and feces on playgrounds and fields), and bed bugs. When a pest of concern or its signs are

seen, staff contact the Coordinator immediately.

Action

When a report is received, the Coordinator assigns a priority based on the severity of the problem and the steps already taken. Anything in a kitchen area is a high priority. Small ants outside a building are low priority unless they are seen entering through a crack or hole, in which case the crack is sealed.

- **Structural.** Items custodial or maintenance staff can resolve quickly are taken care of and reported. Larger work is assigned to maintenance/grounds or custodial staff by work order, with a deadline set by the Coordinator based on risk. The Coordinator informs the Superintendent of work being done and monitors completion.
- **Grounds.** When pests on grounds reach a threshold set by the Coordinator, action is taken under guidelines developed by the Coordinator and the Grounds Lead.
- **Records.** Completed work orders kept as the public record of corrective work and maintained through IncidentIQ, together with time spent and receipts for money spent to manage pests. Records are kept for at least **four** years.

Acceptable thresholds

A threshold is the number of pests that can be tolerated before action is taken. The threshold for cockroaches, mice, rats, raccoons, opossums, skunks and nutria is zero. Thresholds for ants, spiders, flies and similar pests depend on location and severity and are set by the Coordinator in consultation with the Superintendent. Dogs and cats that defecate on school grounds are addressed according to severity and the effect on playgrounds and athletic fields; service animals are exempt. Signs are posted at entry points to playgrounds and athletic fields.

B. Inspections

Each year while school is in session, the Coordinator conducts a Level 3 annual inspection of each campus accompanied by a building custodian, using the Annual IPM Inspection Form, plus one additional routine (Level 2) inspection. The Custodian Lead in each building conducts at least four inspections a year as part of the quarterly building safety inspection and reports findings to the Coordinator and the Safety Committee. Inspections also review human behaviors that affect pests and the results of management activities.

C. Pest Emergencies

If a pest emergency is declared, the area must be evacuated and cordoned off before any other steps are taken.
After consulting with school faculty and the building administrator, the Coordinator may declare a pest emergency when pests immediately threaten the health or safety of students, staff or members of the public using the campus, or the structural integrity of campus facilities. Examples include yellow jackets swarming in areas used by children, a raccoon or nutria in an area used by children, or half a dozen mice or rats running through occupied areas. Actions taken are recorded in the Pest Log. See Section VII.B for notification and posting.

D. Annual IPM Report

In July of each year, the Coordinator submits an annual IPM report to the Superintendent, who shares it with the Board. The report summarizes data from Pest Logs, emails, work orders and Coordinator notes, and the costs of pest management services and pesticides, including turf and landscape products. Routine maintenance items such as sealants, screen repair and door sweeps are not counted as pest control costs. Prevention and management steps that proved ineffective and led to a pesticide application are also included in the annual report of pesticide applications (Section VII.D).

VII. Pesticide Applications: Notification, Posting, Record Keeping and Reporting

Any pesticide application on District property, including weed control products, ant baits, and all professional and over-the-counter products, must be made by a licensed commercial or public pesticide applicator.
Each July, the District posts on its website (https://creswell.k12.or.us/departments/facilities/healthy-and-safe-schools/) this IPM Plan, the list of potential pesticide products that may be used if other measures fail, and how to contact the Coordinator. At the beginning of each school year, staff, students and parents are notified of the list and of the notification and posting procedures for individual applications, including pest emergencies.

A. Notification and Posting for Non-emergencies

When other measures prove ineffective, a low-impact pesticide may be used. Documentation of those measures is required before any application is approved and stays on file with the Coordinator.

- Non-emergency applications take place on non-student days where possible. If an application cannot wait, it takes place after 4:00 p.m., preferably on a Friday. The Coordinator makes the decision and documents the reasons.
- If the label specifies a reentry time, the pesticide may not be applied to an area where students are expected before that time expires. If the label does not specify one, the Coordinator sets a reentry time based on when students would be in the area, ventilation, and whether the area will be cleaned first. A pesticide is never applied while school is in session where students could be exposed before the reentry time.
- At least 24 hours before the application, the Coordinator (or designee) gives written notice by email to the building administrator and office manager and posts it on the District and school websites. The notice identifies the product name, trademark or type, the EPA registration number, the expected area, the expected date (applications may be rescheduled for weather), and the reason for the application.
- Warning signs are placed around the application area no later than 24 hours before the application and remain at least 72 hours after it. Signs read “Warning: pesticide-treated area” and give the date and time of application, the reentry time, and a contact phone number for the applicator or Coordinator.

B. Notification and Posting for Emergencies

- The Coordinator may declare a pest emergency only after consulting with school faculty and administration. The area is evacuated and cordoned off before any other steps.
- A declared pest emergency is the only time a pesticide that is not low-impact may be applied,

other than an application by, or at the direction of, a public health official. In that case, every effort is made to follow the notification and posting requirements.
- Warning signs are placed around the cordoned area as soon as practicable, and before the application begins.
- If 24-hour advance notice is impracticable, the Coordinator sends the notice no later than 24 hours after the application.
- After an emergency application, the Coordinator reviews this plan to determine whether changes could prevent future emergencies and gives a written report to the Board. The Board reviews and takes formal action on any recommendations.

Failure to give notice or post warnings under this section does not create a cause of action for damages and may not be asserted as the basis for a negligence per se claim (ORS 634.740).

C. Record Keeping of Pesticide Applications

The Coordinator (or designee) submits the record to the District Office, where records will be maintained:

- A copy of the product label and Safety Data Sheet (SDS).
- The brand name or trademark and EPA registration number of the product.
- The pest condition that prompted the application.
- The location of the application.
- The approximate amount and concentration of product applied.
- The type of application and whether it proved effective.
- The applicator license numbers and trainee certificate numbers, and the names of the persons applying the pesticide.
- Copies of all required notices and the dates they were given.
- The dates and times warning signs were placed and removed.

These records are kept for at least four years after the application date.

D. Annual Report of Pesticide Applications

By August 31 of each year, the Coordinator completes a report of all pesticide applications for the prior school year. One copy is kept in the District Office with other IPM documentation and one is presented to the Superintendent and Board. For each application, the report includes:

- The brand name and EPA registration number of the product.
- The approximate amount and concentration applied.
- The location of the application.
- The prevention or management steps that proved ineffective and led to the application.
- The type of application and whether it proved effective.

VIII. Approved List of Low-Impact Pesticides

All pesticides must be used in strict accordance with label instructions. The label is the law.
Under ORS 634.705(5), the Board adopts a list of low-impact pesticides for use with this plan. The list may include any product except products that:

- Contain a pesticide product or active ingredient with the signal word “Warning” or “Danger” on the label;
- Contain a pesticide product classified as a human carcinogen or probable human carcinogen

under the EPA 1986 Guidelines for Carcinogen Risk Assessment; or
- Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the EPA 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

EPA's Office of Pesticide Programs classifies active ingredients for cancer potential during registration and re-registration, and the classification system depends on when the ingredient was last evaluated. The National Pesticide Information Center (npic.orst.edu, 1-800-858-7378) can help determine an active ingredient's classification.
The current approved list is attached as Appendix A and posted at (https://creswell.k12.or.us/departments/facilities/healthy-and-safe-schools/).

Appendices

- Appendix A: Approved List of Low-Impact Pesticides
- Appendix B: Pest Log / Pest Report Form
- Appendix C: Annual IPM Inspection Form
- Appendix D: Custodial Quarterly Inspection IPM Addendum
- Appendix E: Pesticide Application Notice and Warning Sign Templates