

# REPLACE WITH ACTUAL IPM NOTICE

## Annual Integrated Pest Management Notice For School Year 2024 - 2025

Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. Haworth Public School has adopted an Integrated Pest Management (IPM) Policy and has implemented an IPM Plan to comply with this law. IPM is a holistic, preventive approach to managing pests that is explained further in the school's IPM Policy included with this notice.

All schools in New Jersey are required to have an Integrated Pest Management Coordinator (IPM Coordinator) to oversee all activities related to IPM and pesticide use at the school.

The IPM Coordinator for [insert name of school] is:

Name of IPM Coordinator: Mr. Donald Turner

Business Phone number: (201) 384-5526

Business Address: 205 Valley Road, Haworth, N.J. 07641

The IPM Coordinator maintains the pesticide product label, and the Material Safety Data Sheet (MSDS) (when one is available), of each pesticide product that may be used on school property. The label and the MSDS are available for review by a parent, guardian, staff member, or student attending the school. Also, the IPM Coordinator is available to parents, guardians, and staff members for information and to discuss comments about IPM activities and pesticide use at the school.

As part of a school pest management plan [insert name of school] may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and the DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure.

### **The following items must be included with this annual notice:**

A copy of the school or school district's IPM policy.

The date, time and place of any meeting if one is to be held for the purpose of adopting **or modifying the school integrated pest management policy or plan.**

A list of pesticides that are in use or that have been used in the past 12 months on school property.

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## District Policy

### 7422 - SCHOOL INTEGRATED PEST MANAGEMENT PLAN (M)

Section: Property  
Date Created: June 2018  
Date Edited: June 2018

#### M

The New Jersey School Integrated Pest Management Act of 2002 requires school districts to implement a school integrated pest management policy that includes an Integrated Pest Management Plan. In accordance with the requirements of the Act, the Board shall ensure implementation of Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. These procedures shall be applicable to all school property in the Haworth School District.

#### IPM Coordinator (IPMC)

The Facilities Manager and Principal shall be designated as the district's Integrated Pest Management Coordinators (IPMC) and are responsible for the implementation of the school integrated pest management policy.

#### Integrated Pest Management Procedures in Schools

Implementation of Integrated Pest Management (IPM) procedures will determine when to control pests and whether to use mechanical, physical, cultural, biological, or chemical methods. Applying IPM principles prevents unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment.

The Integrated Pest Management Coordinator (IPMC) shall consider the full range of management options, including no action at all. Non-pesticide pest management methods are to be used whenever possible. The choice of using a pesticide shall be based on a review of all other available options and a determination that these options are not effective or not reasonable. When it is determined that a pesticide must be used, low impact pesticides and methods are preferred and shall be considered for use first.

#### Development of IPM plans

The Superintendent, in collaboration with the school Building Principal(s) and the IPMC, shall be responsible for the development of the IPM Plan for the school district. The school district's Integrated Pest Management (IPM) Plan is a blueprint of how the school district will manage pests through IPM methods. The school district's IPM Plan will state the school district's goals regarding the management of pests and the use of pesticides for all school district property. The Plan will reflect the school district's site-specific needs and a description of how each component of the school district's Integrated Pest Management Policy and Regulation will be implemented for all school property.

#### Education/Training

The school community will be educated about potential pest problems and IPM methods used to achieve the pest management objectives.

The IPMC, other school staff, and pesticide applicators involved with implementation of the district's IPM policy will be trained in appropriate components of IPM as it pertains to the school environment.

Students and parents/legal guardians will be provided information on this policy and instructed on how they can contribute to the success of the IPM program.

#### Recordkeeping

Records of pesticide use shall be maintained on site to meet the requirements of the State regulatory agency and the Board.

Records shall also include, but are not limited to, pest surveillance data sheets and other non-pesticide pest management methods and practices utilized.

#### Notification/Posting

The Building Principal of each school, working with the IPMC, is responsible for timely notification to students, parents or legal guardians and the school staff of pesticide treatments pursuant to the School Integrated Pest Management Act.

#### Re-entry

Re-entry to a pesticide treated area shall conform to the requirements of the School Integrated Pest Management Act.

[To Regulation](#)[Search District Policies](#)[District Policies TOC](#)

#### Pesticide Applicators

The IPMC shall ensure that applicators follow State regulations, including licensing requirements and label precautions, and must comply with all components of the School Integrated Pest Management Policy.

#### Evaluation

The Superintendent will report annually to the Board on the effectiveness of the IPM Plan and make recommendations for improvement as needed.

The school district's Integrated Pest Management Plan, Policy and Regulation shall be implemented not later than June 12, 2004. The Board directs the Superintendent to develop Regulations/Procedures for the implementation of School Integrated Pest Management Plan.

N.J.S.A. 13:1F-19 through 13:1F-33

Adopted: 19 June 2018



**School Integrated Pest Management Plan  
for the  
Haworth School**

**for the School Year  
Starting 2024 and  
Ending 2025**



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1. **General school information:**

**School name: Haworth Public School**

**Address: 205 Valley Road, Haworth, NJ**

**County: Bergen District: Haworth Zip Code: 07641**

**Phone: 201-384-5526**

**E-mail: [turnerd@nvnet.org](mailto:turnerd@nvnet.org)**

**School IPM Coordinator: Donald Turner**

**E-mail: [turnerd@nvnet.org](mailto:turnerd@nvnet.org)**

**Phone: 201-384-5526, ext. 35125**

2. **Integrated Pest Management Statement**

Integrated Pest Management (IPM) on school property is a long-term approach to maintaining healthy landscapes & facilities that minimizes risks to people and the environment. Haworth School will use: site assessment, monitoring, and pest prevention in combination with a variety of pest management tactics to keep pests within acceptable limits. Instead of routine chemical applications, cultural, mechanical, physical, and biological controls will be employed with selective use of pesticides when needed. Educational strategies are used to enhance pest prevention, and to build support for the IPM program

**3. School IPM Roles & Responsibilities:** For an IPM program to be successful, all members of the school community must be made aware of the school's policies on pest control and their respective roles in the overall pest management plan. The roles, responsibilities, and training for this school regarding pest management are outlined below:

**a. School Administrators:**

Specific duties of New Jersey School Administrators required by the School IPM Act and proposed regulations:

1. Adopt and implement a school IPM Policy and IPM Plan for the school property.
2. Implement IPM procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.
3. Designate a School IPM Coordinator. The IPM Coordinator should be someone who is familiar with the school buildings and grounds, such as the buildings and grounds maintenance staff.
4. Report effectiveness and recommend improvements to the School IPM Plan annually to local school or governing boards.

**Other duties required by law of the school administration but that may be delegated to specific individuals, such as the School IPM Coordinator are:**

5. Coordinate pre- and post-notification of parents and staff of non low impact pesticide applications according to the school's notification procedure. [See Appendix for sample 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) form and 'Emergency Pesticide Use Notification' form].
6. Prepare and post signs as required in areas where non low impact pesticides are to be applied. (See Appendix for sample 'Notice of Pesticide Application' sign for indoor and outdoor applications).
7. Obtain and maintain all pesticide application records for a minimum of 3 years; in the case of termiticides, maintain records a minimum of 5 years.
8. Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter to parents & staff).
9. For contracted services, the school administration will develop bid specifications, contracts, and contract addendums in accordance with the School IPM Policy and Plan.'

**b. School IPM Coordinator Roles & Responsibilities:**

The School IPM Coordinator, by law, is jointly responsible with the school administration for the implementation of this School IPM Plan.

**Role:** The IPM Coordinator is the individual within the facility who is in charge of pest control activities for the school. This individual has the authority and backing of the school administration or management. The School IPM Coordinator has the primary responsibility for ensuring the IPM plan is carried out, and is the primary contact for the school community and public. Ultimately, this person is directly responsible for the integration of all IPM activities through the coordination of all parties including custodial, building, food service, outside vendors, Pest Management Professionals, grounds staff, students, parents, staff, and teachers.

**Specific duties of a New Jersey School IPM Coordinator required by law or regulation:**

1. Implement the School IPM Policy and Plan.
2. Maintain information about the IPM Policy and Plan in place at the school.
3. Maintain information about pesticide applications on school property including records obtained from the pesticide applicator, Material Safety Data Sheets (MSDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented.
5. Provide access to the above information for public review.
6. Respond to inquiries and providing information to students, staff, and parents or guardians regarding IPM.
7. Provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the School IPM Plan.
8. Provides a signature on the 'School Integrated Pest Management Act Compliance Certification' Form when requested by pesticide applicators.
9. Ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing. Also ensure that they follow the School IPM Policy and Plan, as well as all NJDEP School IPM regulations and the precautions of the pesticide label.
10. Obtain training sufficient to implement the Policy and Plan. The School IPM Coordinator will receive NJDEP-approved training that provides an overview of the principles of IPM, legal requirements, and how to implement the IPM Policy and Plan at the school as required by the NJDEP School IPM Regulations Subchapter 13.
11. Submit all required information to the NJDEP.
12. In addition the duties 1-11 above, the IPM coordinator is also responsible for duties #5-8 listed in Section 3a of this IPM Plan (administrator's duties that can be delegated to the IPM coordinator)

**In order to carry out the duties listed in the previous section, the School IPM Coordinator will:**

- Distribute and train school community in the use of the Pest Activity Log.
- Information/educational materials will be produced and used as a tool to help train/educate each sector of the school community as it relates to the role that they play in the IPM effort (i.e. custodial staff, food service staff, administrative staff, teachers, parents, students).
- Compile all reported pest activity in the Pest Activity Log, along with all actions taken to remedy the pest problem (both non-chemical and chemical actions will be recorded).
- Address pest management issues (including key pests, and needed structural/landscape improvements and substandard sanitation practices) which exist both inside and outside the school. **(CONTINUED ON FOLLOWING PAGE)**
- Consider all available options (including no action) with the school's Pest Management Professional prior to determining control(s) to be used.



- Ensure that Pest Management Professional(s) make accurate entries in the 'Pesticide Application Log' when these pesticides are applied at the school.
- Work with administrators if contracting for pest control services to ensure that the bid specifications comply with the school IPM policy and plan.
- Serve as the point of contact for contracted pest management services for the school.
- Evaluates efficacy of IPM practices on school property on a monthly basis at a minimum.
- Sets up and moderates the annual evaluation of the School IPM Plan. Revises the School IPM Plan accordingly.

c. **School Nurse/Health Staff Roles & Responsibilities:**

The school nurse will consider potential pesticide exposure when evaluating a child's health complaint. The school nurse will have access to MSDS sheets for any chemical used on school property and be aware of any children with asthma or chemical sensitivities.

**Other Duties of the School Nurse in the School IPM Program:**

1. Keep copies and review MSDS of all pesticides used on school property.
2. Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
3. Monitor for head lice (a common problem for children between 3 and 10 years old).
4. Educate parents and staff about preventing head lice spread when it occurs.
5. Notify the School IPM Coordinator whenever pests are detected in the health office.
6. Carry out all appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.

**Training of School Nurse/Health Staff:**

In addition to required professional training, the school nurse/health staff should also be aware of public health pests of significance that may impact student health; see EPA's *List of Pests of Significant Public Health Importance* at [http://www.epa.gov/opppmsd1/PR\\_Notices/pr2000-draft.htm](http://www.epa.gov/opppmsd1/PR_Notices/pr2000-draft.htm). and should obtain copies of selected pesticide resources on poisoning which may include: *Recognition and Management of Pesticide Poisonings*, Routt Reigart and James Roberts, 5th edition, U.S. Environmental Protection Agency, March 1999; available online at <http://www.epa.gov/oppfead1/safety/healthcare/handbook/handbook.htm>.

d. **Kitchen/Food Service Staff Roles & Responsibilities:**

Food handling and preparation areas are among the most critical areas for pest management. Kitchen staff must keep all food areas free of crumbs and food residue after use.

**Other Duties of Kitchen Staff in the School IPM Program:**

1. Practice good sanitation of all kitchen and food service areas on a constant basis.
2. Practice good storage practices within all food service and food storage areas.
3. Notify the IPM Coordinator of any mechanical or physical deficiencies that interfere with proper cleaning, storage or that create conditions conducive to pest activity.
4. Kitchen staff members will notify the IPM Coordinator if any pest activity is observed in areas associated with any food service areas
5. Carry out all appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.

**Training of Lunch Prep Staff:**

The IPM Coordinator will be responsible for training the lunch prep staff in proper sanitation procedures when hired and annually thereafter.

e. **Maintenance Staff Roles & Responsibilities:**

Maintenance staff maintains the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance. School maintenance staff may make applications of pesticides that are "over-the-counter" disinfectants and antimicrobials such as Lysol® and toilet-bowl cleaner, and use "minimum risk" pesticides published by the federal EPA. If the use of other pesticide is necessary, only a licensed Pest Management Professional may make the application (see 'c' above).

**Other Duties of Maintenance Staff in the School IPM Program:**

1. Practice excellent sanitation and maintenance techniques in all interior and exterior areas of the school property: David Eichenholtz.
2. Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation.
3. Carry out all appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.
4. Manage specific pest issue(s) as directed by David Eichenholtz. This will not include pesticide application unless the individual is a licensed Pest Management Professional.

**Training of Maintenance Staff:**

1. David Eichenholtz will be responsible for training the indoor Maintenance Staff in proper sanitation procedures and schedules when hired and annually thereafter.
2. The School IPM Coordinator must train the indoor Maintenance Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.
3. If landscaping or turf maintenance is required by their duties, grounds maintenance staff will be trained in accepted horticultural practices grounded in IPM, but **will not be permitted to apply any pesticides** in an effort to manage pests.

**f. Other Staff, Teachers, and Students Roles & Responsibilities:**

Staff, Teachers, & Students should be familiar with the concept of IPM and the benefits that an IPM program brings to the school environment. The general staff, students should understand the role that they play and how they can contribute to a successful School IPM Program.

**Duties of Staff, Teachers, & Students in the School IPM Program:**

1. The most important responsibility of the students and staff is sanitation. Much of the prevention and reduction of pest infestation at the school site depends on whether or not students and staff clean up food leftovers, food in lockers, gum under desks, paper clutter, etc., or perform proper maintenance. Students and staff will be expected to take measures to ensure a clean environment that is not attractive or conducive to pest activity.
2. Practice good storage practices by not allowing areas to become cluttered creating a conducive condition for rodents and other pests.
3. Notify the IPM Coordinator of any mechanical or physical deficiencies that interfere with proper cleaning, storage or that create conditions conducive to pest activity.
4. Notify the IPM Coordinator if any pest activity is observed in areas associated with any food service areas
5. Leave pest control and pest management to trained professionals but follow or carry out appropriate recommendations that are made by either the contracted pest management professional or the IPM coordinator in an effort to manage any existing pest problems or to prevent pest problems from occurring.
6. Will not move sticky traps or other pest monitoring devices.

**Training of Staff, Teachers, & Students:**

School staff, teachers, and students will be trained in their roles in the school's pest management system by the School IPM Coordinator. In addition

**Other training:**

1. "In-Service" educational programs may be provided by the Pest Management Vendor or other outside resources but may be subject to additional fees. Training will be geared to provide an overview on pest identification and the conditions that they may create that promote pests. Staff and students will also be educated on pest reduction strategies connecting people's behavior such as eating at desks, leaving crumbs on floor, etc. to pest problems.
2. Education will be focused to increase people's willingness to share their environment with other organisms so that people are less likely to insist on toxic treatments for harmless organisms.
3. They will be instructed in how to log pest complaints using the 'Pest Problem Report' form.
4. Pamphlets and fact sheets will be made available at the time of training and/or posted on bulletin boards in specific areas such as the cafeteria and teachers' lounge.

g. **Parents or Guardians of All Students Enrolled in the School Roles & Responsibilities:**

Duties of Parents/Guardians in the School IPM Program:

1. Make a concerted effort to prevent pests that may be present in the home from being carried to school in notebooks, lunch boxes, backpacks, clothing, or the children's hair.
2. Make their children aware of their role in the School IPM Program at the school.
3. Encourage children to lend a hand in cleaning up.
4. Discourage children from keeping food in their lockers and desks.
5. Be aware of the current pest management practices in their children's school. Review the 'Annual School IPM Program Notification Letter to Parents & Staff' as well as all notices of application of pesticides at the school. For questions or concerns, parents and /or guardians will contact the School IPM Coordinator.

**Training of Parents and/or Guardians:**

1. David Eichenholtz will educate parents and guardians of all students enrolled at the school about the School IPM Program.
2. Pamphlets and fact sheets will be made available upon request
3. Summary of Key Requirements of NJ School IPM Act and NJ School IPM Fact sheet will be sent home once annually.

h. **Pest Management Professional Roles & Responsibilities:**

All pesticide applications made on school property must be made by applicators or operators licensed to apply pesticides by the NJDEP PCP per the New Jersey Administrative Code Title 7 Chapter 30; Subchapters 1-12. These 'Pest Management Professionals' may either be staff and /or a contractor as described below.

The contractor for indoor pest management services at this school is **Cooper Pest Solutions**. All **indoor applications** at this school will be made by licensed **Cooper Pest Solutions Professional(s)**. Our contact for the company is Mack Thompson and the phone number where our contact can be reached is: 609 799-1300. The contractor will meet all specifications as contracted by the School per the attached contract.

The contractor for exterior pest management services of structurally invading pests and pests of public health importance is **Cooper Pest Solutions**. All pesticide applications for the control of structurally invading pests and pests of public health importance will be made by licensed **Cooper Pest Solutions Professional(s)**. Our contact for these services is the same as stated above for interior pest management.

No contract or contractor has been assigned to provide horticultural services for pest management associated with landscaping and/or turf.

**Other Specific Duties of Pest Management Professional(s) in the School IPM Program:**

1. Inspect school premises Once per Month for the presence of pests or signs of pest activity.
2. Inspect and maintain all pest management monitoring/trapping devices (i.e. insect sticky traps, rodent traps etc.)
3. Provide a written report of all inspection findings and recommendations for all maintenance service visits as well as all service calls.
4. Notify the IPM Coordinator when pests or signs of pest activity are found.
5. Make written recommendations to the School IPM Coordinator for corrective actions to be taken by the school to reduce potential pest populations. **(CONTINUED ON NEXT PAGE)**

6. Recommend to School IPM Coordinator appropriate non-chemical procedures to correct pest problems.
7. When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
8. When approved by the School IPM Coordinator, follow appropriate least-toxic procedures to correct pest problems. Never apply a non low impact pesticide without first consulting in advance with the IPM Coordinator to allow them to proceed with all required notification and posting of the area to be treated.
9. Provide School IPM Coordinator with MSDS (when available) of any pesticide that is applied on school property.
10. Provide application information as specified in the 'Non Low Impact Pesticide Application Log' when they apply these pesticides at the school. This log is kept in **John Orozco** files. (see Listing of Low Impact Pesticides in IPM Binder)
11. If a non low impact pesticide is to be used, provide a 'School Integrated Pest Management Act Compliance Certification' Form to the School IPM Coordinator for their signature ensuring all advance notification and posting has been performed as required. Applicators are not liable for damages resulting from the failure of the school to provide the notification or posting as required by the New Jersey School IPM Act.
12. Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.

#### **Training of Pest Management Professional:**

Training for either a new commercial applicator or operator is to include BOTH a PCP approved basic pesticide training course, and 40 hours of on-the-job training to competently perform the functions associated with any applications in which they are expected to perform. Additionally, within the 40 hours of training, the candidate must perform or witness a minimum number of applications for each of the categories that they will be licensed. In addition, anyone applying pesticides on school property will be certified in Category 13 (School IPM) once this becomes required by the NJDEP.

#### **i. Other Vendors and Contractors Roles & Responsibilities**

Duties of vendors and contractors in the School IPM Program to be prescribed in specific language in their bid specifications and contracts:

1. Contracts will specify regular maintenance service, cleaning under and behind machines during service visits, and immediate correction of problems which may foster pests (for example, breakage, leaks, or excessive condensation from machinery).
2. Vendors and contractors will be expected to carry out maintenance in a manner that supports and aids the IPM effort and will not carry out any activities that are not in compliance with the NJDEP School IPM Regulations (ex. HVAC vendor applying a pesticide treatment for wasps in order to service an air handling unit)..

#### **Training of Other Vendors and Contractors:**

Vendors and Contractors will be educated by **John Orozco** regarding the goals and objectives of the School IPM Program as it relates to the service that they are contracted to provide to the school.

#### **4. Pest Identification: Preliminary Site Assessment and Ongoing Monitoring**

One of the key principles of School IPM is site assessment to precisely define the presence of pests and the site conditions that contribute to their presence. Indoor and outdoor pests will be defined for the school by historical account, interviews, and by direct monitoring. When the IPM program is implemented at the School, **Cooper Pest Solutions** will perform a thorough inspection of all school buildings and grounds to identify pest activity and conditions that are contributing to any pest problems.

**Indoor site assessment, Cooper Pest Solutions** will compile a list of:

- Areas that currently have pests or show signs of pest activity.
- Areas of historical pest activity.
- Conditions or behaviors contributing to pest problems that can be corrected.
- Inspection of detection and monitoring devices and bait stations.
- Recommendations for sanitation, structural repairs, and habitat modification.

**Outdoor site assessment, Cooper Pest Solutions** will map the school grounds:

- Identify conditions that are conducive to structural pest activity or entry

#### **Monitoring of Indoor Pests**

1. Routine ongoing monitoring (**performed once per month by Cooper Pest Solutions**)
  - Indoor pests will be monitored via direct inspection as well as physical monitoring devices such as sticky traps, pheromone baits, light traps, mechanical rodent traps, etc.
  - Monitoring devices and/or trap that are installed as part of the ongoing maintenance program will be recorded on a school floor plan.
2. Reactionary monitoring in non-maintenance service areas
  - In the event that a pest problem is reported in an area that is not already being monitored, monitors/traps will be installed as necessary and will be checked until the pest infestation is under control.
  - These monitors will be checked at least once per month until the pest problem has been controlled, but may be checked more frequently if necessary.
3. General Requirements for all monitoring/trapping devices
  - Each device will be marked with appropriately as required by NJDEP Regulations.
  - All monitoring and or trapping devices will be properly maintained by the pest management vendor during each service and all inspection findings documented in writing.
  - Monitoring and trap catch results will be used to help determine the appropriate actions to be taken to correct active pest problems and to prevent future pest problems from reoccurring.

#### **Monitoring Outdoor Pests**

1. Exterior pest activity and conditions conducive to pest activity will be monitored via direct visual inspection one time per month by Cooper Pest Solutions)
2. No provisions are made for monitoring pests of the ornamental landscape or turf

#### **Monitoring Records:**

The IPM Coordinator will maintain and keep records of any pest monitoring, including traps.

## **5. Pest Prevention and Control**

Wherever possible, the School will take a preventive approach by identifying and removing, to the degree feasible, the basic causes of the problem rather than merely attacking the symptoms (the pests). This prevention-oriented approach is also best achieved by integrating a number of strategies. It is easier to spot a potential problem when the interior and exterior of the school is clean and uncluttered.

IPM employs a multi-tactic approach, integrating several strategies to combat a particular pest. Control strategies that remove a pest's food, water, and shelter (harborage), and limit its access into and throughout buildings and on school grounds will be employed as follows:

- **Cultural control**: for example, improve sanitation; reducing clutter; people change habits like leaving food in the classroom; maintain plant health by taking care of the habits and conditions; fertilization, plant selection (right plant/right place), and sanitation to exclude problematic pests and weeds.
- **Physical control**: for example, pest exclusion; removing pest access to the school building by sealing openings with caulk and copper mesh; repairing leaks and screens; removing pests by hand.
- **Mechanical control**: for example, insect monitors, light traps, rodent traps; till soil prior to planting to disrupt pest life cycles.
- **Biological control**: use of pest's natural enemies. For example, introduce beneficial insects or bacteria to the environment or, if they already exist, provide them with the necessary food and shelter; and avoid using broad-spectrum chemicals that will inadvertently kill beneficials.
- **Least hazardous chemical controls** with preference given to School IPM Act-defined 'low impact pesticides'.

### **Action Thresholds**

No pesticide applications will take place unless the action thresholds for the pest have been reached. Action Thresholds do not trigger the automatic use of pesticides, but rather, trigger the opportunity for pesticides to be considered as a control option particularly if other IPM tactics have not been able to control pest populations to an acceptable level.

Pesticides will be selected when the action threshold has been reached and other non chemical control methods are not effective or practical in resolving a pest problem. Pesticides will not be used on School property unless both the pest has been identified and its presence verified. It is neither possible, nor desirable to completely exterminate every pest and potential pest from every population on school property.

The New Jersey School IPM law defines 'low impact pesticides' and necessarily creates the distinction 'non low impact pesticides' for other pesticides not meeting their definition. The law and resulting model policy published by DEP make it clear that when pesticide use is needed, preference should be given to choosing a 'low impact pesticide', if possible. The School will give preference to choosing a 'low impact pesticide', as described below.

A low impact pesticide is a pesticide that is considered to have relatively minimal risk as compared to pesticides in general. The New Jersey School IPM law specifically defines what a low impact pesticide is in two parts. The first part consists of a federal EPA list of pesticides that it considers to be minimal risk and thus do not require formal registration. These pesticides are listed in the federal code at 40 CFR § 152.25. (See <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/40cfr15225.pdf>). The second part

consists of a list of pesticide ingredients (such as boric acid or diatomaceous earth) and formulation types (such as gels or pastes) that are considered low impact. It is important to note that a substance considered "low impact" does not necessarily mean zero risk. All pesticides must be used properly to reduce potential risk from their use.

When it is determined that a non low impact pesticide must be applied to adequately control pests within established thresholds, application guidelines **per the law** will be followed. Specifically, non low impact pesticides will be applied in a school building only when students are in another area of the building AND only if the area being treated with the pesticide is served by a different air handling system and is separated from the students by smoke or fire doors. Further, applications of non low impact pesticides on school property will be made in advance of when students will be present for instruction or extra-curricular activities, allowing for any label-prescribed entry restrictions; if there is no re-entry interval listed on the label, a minimum of 7 hours will be allowed prior to student re-entry on school property.

**Per the law**, emergency application of a non-low impact pesticide will only be made when the health or safety of a student or staff member is threatened. A "school pest emergency" is defined in the law as "an urgent need to mitigate or eliminate a pest that threatens the health or safety of a student or staff member." One example would be the presence of stinging insects such as ground hornets in an athletic field where events are scheduled. If a pest emergency exists, the school may use pesticides without the normal 72-hour pre-notification to parents and staff, and the advance posting of signs. Rather, the posting must be done at the time of the application, and the notice to parents and staff must be done within 24 hours after the emergency application. The notice that goes to parents and staff must explain what the reason for the emergency was, and if possible, what could be done to prevent such an emergency use next time.

Treatments, whether pesticides or low impact pesticide materials, will only be applied on school property when and where needed. It is rarely necessary to treat an entire building or landscape area to solve a pest problem. Monitoring will be used to pinpoint where pest numbers are beginning to reach the action level and 'spot' treatments' will be confined to those areas.

The School IPM Coordinator and Pest Management Professional(s) will meet bi-monthly to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the School IPM Coordinator. They will consider all options, including no control, and look at pest activity levels versus thresholds.

They will consider EPA-defined criteria for selecting a treatment strategy:

1. Least hazardous to human health
2. Least disruptive of natural controls
3. Least toxic to non-target organisms
4. Most likely to be permanent
5. Easiest to carry out safely and effectively
6. Most cost-effective
7. Most site-appropriate

All controls that are actually implemented, both chemical and non chemical, should be documented in the log by **Cooper Pest Solutions**



## **6. Notification, Posting, and Re-Entry**

It is important to keep the school community informed of the school's implementation of the School IPM Plan. Accordingly, this section outlines the:

- annual notification of School IPM program status.
- pre-notification of planned use and notification of emergency use of non low impact pesticides.
- posting requirements for areas inside and out that are treated with pesticides.
- re-entry requirements for areas inside and out that are treated with pesticides.

### **Annual Notification**

**the School IPM Coordinator** will prepare and send an annual notice of school IPM program status to parents or guardians of each student enrolled at the school, and all staff members at the beginning of each school year. Once the annual notice has been sent, the school IPM coordinator will also give this information to new staff or the parents/guardians of new students upon their arrival.

The Appendix has a sample 'Annual School IPM Program Notification Letter to Parents & Staff'.

**New Jersey law requires** that this notice shall include:

1. a copy of the School IPM policy
2. the name, address, and telephone number of the integrated pest management coordinator of the school or school district
3. a list of any pesticide that is in use or has been used within the last 12 months on school property
4. a statement that:
  - (a) the integrated pest management coordinator maintains the product label and material safety data sheet, when available, of each pesticide that may be used on school property;
  - (b) the label and data sheet is available for review by a parent, guardian, staff member, or student attending the school; and
  - (c) the integrated pest management coordinator is available to parents, guardians, and staff members for information and comment;
5. the time and place of any meetings that will be held to adopt the school integrated pest management policy; and
6. the following statement:

*"As part of a school pest management plan, Haworth School may use pesticides to control pests. The United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (DEP) register pesticides to determine that the use of a pesticide in accordance with instructions printed on the label does not pose an unreasonable risk to human health and the environment. Nevertheless, the EPA and DEP cannot guarantee that registered pesticides do not pose any risk to human health, thus unnecessary exposure to pesticides should be avoided. The EPA has issued the statement that where possible, persons who are potentially sensitive, such as pregnant women, infants and children, should avoid unnecessary pesticide exposure."*

## **Notification and Posting of Non Low Impact Pesticide Use**

There are two situations when non low impact pesticides may be used on school property; when it is pre-planned and when it is an emergency.

### **1. Pre-Notification and Posting of Planned Non Low Impact Pesticide Use:**

At any time of the year when children may be present, the school will issue prior notification of all non-low impact pesticides to be used. Specifically, **the IPM coordinator** will issue notice to all staff, and parents/guardians of each student enrolled at the school. The area where the pesticide will be applied will be posted at least 72 hours prior and 72 hours following the application.

### **2. Emergency Use Notification and Posting for Non low Impact Pesticide Use:**

When an emergency application of pesticides is required, **the IPM coordinator** will issue notice of emergency use of non low impact pesticides used to all staff, and parents or guardians of each student enrolled at the school within 24 hours after the application or on the morning of the next school day, whichever is earlier. The reason for the emergency and any measures that will be taken so that emergency pesticide use may be avoided in the future may be included. The area where the pesticide is applied will be posted at the time of application, and will remain posted for 72 hours following the application.

In either situation, the school is **required by law to make NJDEP-prescribed notification and posting** as described below. The Appendix contains sample written notification forms, 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) and 'Emergency Pesticide Use Notification', and a sample posting sign (for indoors & outdoors) 'Notice of Pesticide Application'. The specific 'what', 'how' and 'where' requirements of the law that will be followed on School property on posting and notification follows:

**What:** In either planned or emergency applications of non low impact pesticides, **New Jersey law requires** content of both notification and posting as follows:

- common name of pesticide,
- EPA registration number,
- EPA statement on sensitive persons: "*Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure*"
- location description, date, and time of application (one date for indoor application; three dates for outdoor applications in case of cancellation),
- potential adverse effects of product,
- reasons for the application,
- contact information for the IPM Coordinator of the school or school district, and
- further label information or precautions for public safety.

**How:** In either planned or emergency applications of non low impact pesticides, the IPM coordinator will advise the parents and guardians and staff of the school of pesticide applications by on or more of the following methods of notification:

- written note that the students take home (see Appendix for sample notice)
- written note that is mailed at least one week prior to the application (see Appendix)
- phone call
- direct contact
- email

**Where:** In either planned or emergency applications of non low impact pesticides, per New Jersey law, the IPM coordinator will post signs:

- Prominently in or adjacent to the area where the pesticide is to be applied.
- At each entrance to the building or school ground where the pesticide is to be applied.
- That are at least 8.5" by 11".

### **Re-Entry**

If there is application of a low impact pesticide on school property, it will be made so that adequate settling or drying occurs in advance of when students will be present for instruction or extra-curricular activities.

Students cannot enter a pesticide treated area for at least seven hours after the application of a non low impact pesticide, unless the pesticide label states a specific numerical re-entry time that is different than this. The use of low impact pesticides does not require an automatic seven-hour wait; students can re-enter after the pesticide application has dried or settled, or longer if the pesticide label specifies.

## **7. Record Keeping**

**Cooper Pest Solutions** will maintain records as listed in their outlined role and responsibility for school IPM.

The following records will be maintained in the IPM Log binder kept in the maintenance department:

- Pest Management service reports documenting all inspection findings, actions taken and recommendations
- IPM Pest Activity Monitoring Findings
- Pest Management service call report (for services in addition to routine maintenance visits)
- Indoor Pest Thresholds
- Pesticide Application Records
- Annual School IPM Program Notification Letters to Parents & Staff
- Pre-Notification of the Use of Pesticides (72 hour pre-notification)
- Emergency Pesticide Use Notifications
- School Integrated Pest Management Act Compliance Certification Forms
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'

## **8. Evaluation**

At least annually, the School IPM Plan and School IPM Program of the Haworth Public School will be evaluated. This necessarily includes review of all records in the IPM log binder. Program evaluation involves reviewing monitoring data, actions taken, treatment impacts and effectiveness, and any other relevant observations. These records will provide information on previous and current pest populations and which strategies were applied. Comparing data will clearly indicate which pest management strategies were most effective for the amount of time and money spent. IPM practices and procedures will be modified, if necessary, based on past experience, results, and gained knowledge. This evaluation will be coordinated by **the IPM coordinator** along with a **representative of Cooper Pest Solutions**.

The following issues will be addressed during the evaluation of the School IPM Plan and Program

1. adequacy of pest control indoor and outdoor
2. areas of concern
3. sanitation issues
4. building maintenance issues
5. new less toxic pest control tactics
6. adequate support by all members of the community
7. adequacy of thresholds
8. revise integrated pest management priorities

A written evaluation will be completed and the School IPM Plan will be revised accordingly by **the IPM coordinator**