

PATERSON PUBLIC SCHOOLS
FACILITES MANAGEMENT



INTEGRATED PEST
MANAGEMENT PLAN FOR
SCHOOLS

N.J.A.C 7:30-13.1

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ISSUE 10

December 5, 2018

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I. 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. Paterson Public Schools 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 will be used to enhance pest prevention, and to build support for the IPM program

II. Paterson Public Schools Integrated Pest Management Policy

The New Jersey School Integrated Pest Management Act of 2002 requires schools to implement a school integrated pest management policy.

The state appointed superintendent of the Paterson Public School District, the Paterson Public School Board of Education and the principal or lead administrator of each school, as appropriate shall implement Integrated Pest Management (IPM) procedures to control pests and minimize exposure of children, faculty, and staff to pesticides. The Paterson Public Schools shall therefore develop and maintain an IPM plan as part of the district's policy. Teams shall be created for each school within the district as listed in Appendix K.

III. IPM Plan Goals:

- a. The roles, responsibilities, and training of all members of the school community school administration, School IPM Coordinators, School Nurse, kitchen staff, maintenance staff, staff, teachers, students, parents or guardians of all students enrolled in the school, regarding IPM at the school are clearly defined.
- b. Pest identification: Historically, the Paterson Public School District has been plagued with rodents and cockroaches and most recently occasional bed bugs and raccoons.
- c. Monitoring logs will be maintained by the Chief Custodian.
- d. Monthly non-impact maintenance will be completed by an external vendor.
- e. Records of this monthly maintenance schedule and recordkeeping will be maintained by the Chief Custodian and Sector Supervisor.
- f. Pest prevention and control to maintain a healthy school environment: Outline non-chemical controls are routinely practiced at the school.
- g. The threshold levels for all anticipated pests are non-tolerance and any reports of pests will be addressed immediately.
- h. Prescribed use of low impact versus non low impact pesticides for identified pests can be found in the Current Vendor binder information.
- i. Records of all pesticide applications are maintained by the Chief Custodian and the Executive Director of Facilities or designee.
- j. Keep the school community informed: Maintain IPM records and make available for public inspection. The Chief Custodian will maintain the records for each building using Appendices A, B, D, E, F, and G. The Executive Director of Facilities or designee will issue annual notice of school IPM program status, Appendix C. The

- notices will be sent to the schools and a copy will be maintained in the regulatory file of facilities.
- k. The pre-notification procedures for non-low impact pesticide use and notification procedures for emergency use of non-low impact pesticides will be handled through the Executive Director of Facilities or designee.
 - l. Posting procedures for indoor and outdoor areas that are treated with non-low impact pesticides will be completed by the Executive Director of Facilities or designee, sent electronically to the Chief custodian and principal for posting and record keeping. These records will also be kept electronically in the Facilities Office.
 - m. The PPS School District IPM Plan will be reviewed annually. School team members will be interviewed; recommendations will be taken into consideration and if practical integrated into the plan. The Executive Director of Facilities or designee will coordinate these efforts.

IV. District 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. The PPS District has adopted and implements a school IPM policy for the school property; following the Model Policy that was developed by the NJDEP.
2. **Principals** will implement IPM procedures to control pests and minimize exposure of children, faculty, and staff to pesticides.
3. The Principal and the designees will serve as the School IPM Team, see Appendix K.
4. The Chief Custodian is familiar with the school building and grounds, and will coordinate the efforts for pest control.
5. School team members will report effectiveness and recommend improvements to the School IPM Plan annually to the Executive Director of Facilities or designee.

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

6. The Principal or designee will coordinate pre- and post-notification of parents and staff of non-low impact pesticide applications according to the PPS District notification procedure.

7. The Executive Director of Facilities or designee will complete all 'Pre-Notification of the Use of Pesticides' (72 hour pre-notification) form, Appendix E and 'Emergency Pesticide Use Notification' form, Appendix G.
8. The Executive Director of Facilities or designee will prepare the signs and the Chief custodian will post signs as required in areas where non-low impact pesticides are to be applied, see Appendix D, 'Notice of Pesticide Application' sign for indoor and outdoor applications will be used for such notification.
9. 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.
10. The Executive Director of Facilities or designee will prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff', see Appendix C.
11. The Contracted services will be contracted directly by the district, as written within the bid specifications. A copy of the PPS IPM Plan will be issued to all stakeholders to ensure compliance.

b. School IPM Coordinator:

The School IPM Coordinator shall be the Chief Custodian, **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.

The Superintendent or his designee is the primary contact for the school community and public. The Executive Director of Facilities or designee 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, Executive Director of Facilities or designee **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, Safety Data Sheets (SDS) when available for pesticides used, and labels for all pesticide products used.
4. Maintain records of any pest monitoring and non-pesticide controls implemented. Appendix A, IPM Pest Activity Monitoring and Control Log' will be maintained by the Chief Custodian of each building in conjunction with the Executive Director of Facilities or designee.

5. The Executive Director of Facilities or designee will provide access to the above information for public review.
6. The Executive Director of Facilities or designee will respond to inquiries and providing information to students, staff, and parents or guardians regarding IPM.
7. The Executive Director of Facilities or designee will provide training in IPM practices to the school community as described in the individual 'Roles, Responsibilities, and Training' sections of the PPS District IPM Plan.
8. The Executive Director of Facilities or designee will provide a signature on the 'School Integrated Pest Management Act Compliance Certification Form when requested, Appendix L by pesticide applicators.
9. The Executive Director of Facilities or designee will ensure that all persons conducting pesticide applications have all NJDEP-required training, certification, and licensing in Category 13 School IPM. 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 (i.e., NJDEP-approved training).
11. The Executive Director of Facilities or designee will submit required information to the NJDEP.

School administration responsibilities by law (see # 5, 6, 7, and 8 of their duties) that must be carried out and may be delegated as duties of the PPS District IPM Coordinator by this school administration include all the follow:

- Coordinate pre- and post-notification of parents and staff of non-low impact pesticide applications according to the school's notification procedure.
- The Executive Director of Facilities or designee will prepare signs as required and the chief custodian will post signs as required in areas where non low impact pesticides are to be applied.
- The Executive Director of Facilities or designee will 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.
- The Executive Director of Facilities or designee will prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff, Appendix C.

In order to carry out the duties prescribed above, the District IPM Coordinator, Executive Director of Facilities or designee, will:

- Distribute and train school community in the use of 'Pest Problem Report Forms' to be submitted when activity is noticed.
- Distribute to the Director of Food Services the 'Food Service Report' forms, Appendix I to be submitted weekly to the Chief of Operations of Food Services.

- Compile all 'Pest Problem Report' and 'Food Service Report' forms received in IPM Pest Activity Monitoring and Control Log. Also, write actions taken to remedy pest problems in the log.
- Maintain a prioritized list of pest management issues (including key pests, and needed structural/landscape improvements and substandard sanitation practices which exist both inside and outside the school.
- 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, Appendix B when these pesticides are applied at the school.
- Work with administrators 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.

Training:

The PPS District 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 per rules to be adopted by the NJDEP in the fall of 2004. The Executive Director of Facilities is a NJ Licensed Pesticide Applicator in category 13 - IPM in Schools.

IN addition, all Building Administrators, Chief Custodians and Designees of the building administrator will complete the NJDEP-approved training, as written above.

c. Pest Management Professional:

All pesticide applications made on school property must be made by applicators or Operator's licensed to apply pesticides by the NJDEP PCP per the New Jersey Administrative Code Title 7 Chapter 30; Subchapters 1-12. These 'Pest Management

All **indoor applications** in the District are made by licensed contractor, Pest Management Professional(s). The contractor for indoor pest management services in the District is Bowco Laboratories. The PPS District contact for the company is Mr. Doug Boyle, (732) 636-3777. These services will include all requirements as written in the contractual obligations between Bowco and the PPS District.

All **outdoor applications** in the District are made by licensed contractors, Pest Management Professional(s). The contractor for outdoors pest management services is determined at the time of service. The contractor will meet all specifications as contracted by the PPS District per the contract between PPS and Bowco. If specified in the contract, the contractor will provide horticultural services for landscape and turf management.

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

- Inspect school premises bi-monthly for the presence of pests or signs of pest activity.
- Notify the IPM Coordinator, Executive Director of Facilities or designee, when pests or signs of pest activity are found.
- Make written recommendations to the School IPM Coordinator, Executive Director of Facilities or designee, for corrective actions to be taken by the school to reduce potential pest populations.
- Recommend to School IPM Coordinator, Executive Director of Facilities or designee, appropriate non-chemical procedures to correct pest problems.
- When it is determined that a pesticide must be used, select and recommend necessary pesticides. Preference will always be given to low impact pesticides.
- When approved by the School IPM Coordinator, Executive Director of Facilities or designee, 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, Executive Director of Facilities or designee, to allow them to proceed with all required notification and posting of the area to be treated.
- Provide School IPM Coordinator, Executive Director of Facilities or designee, with SDS (when available) of any pesticide that is applied on school property.
- Provide application information as specified in the 'Non-Low Impact Pesticide Application Log' when they apply these pesticides at the school. This log is maintained by the School IPM Coordinator, the Chief Custodian.
- If a non-low impact pesticide is to be used, provide a 'School Integrated Pest Management Act Compliance Certification' Form to the PPS District IPM Coordinator, Executive Director of Facilities or designee, 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.
- Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.

In order to maintain valid Pesticide Applicator Certification in the state of New Jersey, pesticide applicators must earn a minimum of 24 recertification credits by attending continuing education courses. Commercial Pesticide Applicators must accumulate 8 Core credits and 16 category credits (per each category certified).

The NJDEP requires an additional category 13 ("IPM in Schools") for commercial applicators that apply pesticides on school property. This IPM in Schools category is required in addition to any other category (such as ornamental & turf, or termite control) required depending on the type of work performed.

d. **School Nurse:**

The school nurse will consider potential pesticide exposure when evaluating a child's health complaint. The school nurse should have access to SDS 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 will be as follows:

- Keep copies and review SDS of all pesticides used on school property.
- Maintain easy access to Poison Control Center hotline at 1-800-222-1222 in case acute poisoning is suspected.
- Monitor for head lice (a common problem for children between 3 and 10 years old).
- Educate parents and staff about preventing head lice spread when it occurs.
- Submit a 'Pest Problem Report' to PPS District IPM Coordinator, Executive Director of Facilities or designee, whenever pests are detected in the health suite/Nurse's office.
- The School Nurse will maintain a Pest Problem report for human pest problems, such as lice or bedbugs, Appendix J.

Training

In addition to required professional training,

- 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/oppmsd1/PR_Notices/pr2000-draft.htm.
- Obtain copies of selected pesticide resources on poisoning which may include:

Recognition and Management of Pesticide Poisonings, Routh 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>.

e. **Kitchen Staff:**

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 will be as follows:

- Practice good sanitation of all kitchen and food service areas, clean all surfaces daily.
- The Manager of the kitchen staff will inspect the kitchen daily.
- The Manager of the Kitchen will submit a Pest Problem Report Food Service Report, Appendix I, to the Chief of Operations of Food Services, whenever pests are detected in the kitchen and food service areas. The Director of Food Services or his designee will work in conjunction with the District IPM Coordinator to rectify the problem.
- Kitchen staff will work in conjunction with custodial staff to ensure the Breakfast in Classroom protocol is met.

Training:

The PPS District Director of Food, and when necessary, the Executive Director of Facilities or designee, will be responsible for training the kitchen staff in proper sanitation procedures when hired and annually thereafter. The School IPM Coordinator will train the kitchen staff in the pest detection and monitoring program in place in the kitchen when hired and annually thereafter.

f. **Custodial Staff:**

Custodial staff both PPS District employees and Contractual Custodial Staff maintain the cleanliness and take care of the school building and grounds. These staff members may be assigned to indoor and/or outdoor maintenance.

Other Duties of PPS Custodial Staff and Contractual Custodial Staff in the School IPM Program will:

- Practice all sanitation and maintenance techniques.
- Provide a 'Pest Problem Report' to School IPM Coordinator, Chief Custodian, whenever pests or signs of pest activity are discovered in the school building, or are a problem on school grounds.
- Recognize and correct conditions that may lead to pest problems such as water leaks, potential pest entryways, and poor sanitation practices
- Manage specific pest issue(s) as directed by the Chief Custodian or District IPM Coordinator, Executive Director of Facilities or designee. This will **NOT** include pesticide application.

Training:

- The PPS District IPM Coordinator or designee, will be responsible for training the PPS Custodial Staff in proper sanitation procedures and schedules when hired and annually thereafter. Contractual Custodial staff shall be trained by their own company.
- The School IPM Coordinator, Executive Director of Facilities or designee, must train the PPS District Custodial Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.

g. **Staff, Teachers, and Students:**

Duties of Staff, Teachers, & Students in the School IPM Program will abide by the following:

- 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.
- Leave pest control and pest management to trained professionals.
- Will not move sticky traps or other pest monitoring devices.
- Report any evidence of pest activity to the School IPM Coordinator, Chief Custodian.
- Food Consumption shall take place in designated areas as approved by the Building Administrator/Principal.
- The Building Administrator/Principal shall complete Appendix N listing all designated areas where food may be stored and/or consumed.
- Will not consume food or beverages, excluding water, except in designated areas, as determined by the building administrator/principal.
- Special Permission for holiday parties will be granted by the building administrator in conjunction with the Chief Custodian. Faculty will ensure that any remaining food will be removed or disposed at the end of the party.
- Faculty will not store any food products in closets or classrooms.
- Refrigerators and other such kitchen appliances are prohibited from the classroom.
- Food shall not be sold, except by the Department of Food Services.
- Permission for limited bake sales throughout the year shall be granted by the building administration/principals.
- Faculty shall make arrangements for the consumption of food in the designated areas during lunch time detentions.
- Faculty will keep classrooms clutter free to deter pests from nest building.

Training:

School staff, teachers, and students will be trained in their roles in the school's pest management system by the PPS District IPM Coordinator, Executive Director of Facilities or designee.

Other training shall include but is not limited to:

- Staff, teachers, and students will be given a brief overview or updates by the PPS District IPM Coordinator, Executive Director of Facilities or designee or the School IPM Coordinator, Chief Custodian, on pest identification and the conditions that they may create that promote pests. This information will focus on pest reduction strategies connecting people's behavior such as eating at desks, leaving crumbs on floor, etc. to pest problems.
- 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.
- They will be instructed in how to log pest complaints using the 'Pest Problem Report' form.
- 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.

h. Parents or Guardians of All Students Enrolled in the School:

Duties of Parents/Guardians in the School IPM Program:

- Learn about IPM practices and follow them at home so that pests are not carried to school in notebooks, lunch boxes, backpacks, clothing, or the children's hair.
- Make their children aware of their role in the School IPM Program at the school.
- Encourage children to lend a hand in cleaning up.
- Discourage children from keeping food in their lockers and desks.
- 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, Executive Director of Facilities or designee.

Training

- The Building Administrator/Principal or his designee will educate parents and guardians of all students enrolled at the school about the School IPM Program.
- Pamphlets and fact sheets will be made available upon request.

i. Vendors and Contractors

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

- 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).

V. 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, Appendix H. 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, the Pest Management Professional(s) and/or School IPM Coordinator 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: Pest Management Professional and/or School IPM Coordinator will compile and map on floor plans of the building.

- Areas that currently have pests or show signs of pest activity.

- Areas that historically have had pests as well as identifying when this occurs during the school year.
- Conditions or behaviors contributing to pest problems that can be corrected.
- If already in use, location of detection and monitoring devices and bait stations.
- Recommendations for sanitation, structural repairs, and habitat modification.

Outdoor site assessment: Pest Management Professional and/or School IPM Coordinator will map the school grounds:

- Show locations of trees, shrubs, and ornamentals.
- Assign & divide the landscape into management units (for example, football field turf versus playground).
- Note key plants, any pest problems, and horticultural recommendations.

It is important that the pest(s) be accurately identified in order to gather information about the pest's life cycle and habits. Identification is essential for selecting the combination of strategies which will be most effective as well as knowing when to implement them. If the PPS District IPM Coordinator and the Pest Management Professional are unable to identify the pest(s), the County office of Rutgers Cooperative Extension (RCE) will be consulted and samples will be submitted for identification if needed.

Ongoing Monitoring

Once a pest is correctly identified, monitoring methods and schedules, as well as controls will be determined based on its life cycle, food sources, habitat preferences, and natural enemies.

Indoor pests will be monitored via direct inspection, sticky traps, pheromone baits, tracking powder, mechanical traps, and glueboards as necessary. If baits or traps of any kind are used:

- Each bait station or trap is assigned an identification number.
- A map is prepared showing the location and number of each trap or bait placement.
- Each trap or bait station is marked with appropriate warning language.
- Traps will be checked by the Pest Management Professional weekly during the early stages of solving a serious pest infestation, and then taper off to monthly, once the pest problem is under control.
- Captured rodent pests will be recorded and disposed of on a daily basis.

Outdoor landscape pests will be monitored via direct inspection will:

- Landscape plants are scouted at least monthly during the growing season for conditions requiring action (for example, damaged diseased, dead limbs; soil erosion/compaction; insect, disease, weed pests and damage).
- Scouting usually begins when plants put out new leaves in spring and ends when leaves fall in autumn.
- Plants with annually recurring pest problems will be scouted according to pest appearance timetables.

Monitoring Records: The School IPM Coordinator, Chief Custodian, or other designee shall maintain and keep records of any pest monitoring, including traps.

VI. 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 Beneficial's.
- Least hazardous chemical controls with preference given to School IPM Act-defined 'low impact pesticides'.

Pesticides will be selected when other 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 current contractual exterminator will establish injury (also known as tolerance or threshold) levels and action thresholds for each individual pest species before making any chemical treatment. Action Thresholds for pesticide treatment are triggered if all other IPM tactics have not been able to control pest populations to an acceptable level. Appropriate injury levels will be set, and may take into consideration economic losses (for example, amount of foodstuffs contaminated by pantry pests); health risks (for example, occurrence of disease-bearing pests); aesthetic evaluations (for example, temporary presence of ants); nuisance problems (for example, stinging insects); and pest visibility.

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.

See the Rutgers Cooperative Extension School IPM website at <http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/NJAct/lowimpact.htm> for information on low impact pesticides as it becomes available.

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.

VII. Emergency Application

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 PPS District IPM Coordinator and Pest Management Professional(s) will meet as required to cover monitoring reports and determine corrective action. The Pest Management Professional should make recommendations for corrective actions to the PPS District 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

They will generate a pest management priority list to optimize a plan of corrective actions. The PPS District IPM Coordinator, Executive Director of Facilities or designee, will assign and contact the appropriate staff to carry out individual tasks on the checklist.

All controls that are actually implemented should be documented in the log by the School IPM Coordinator, Chief Custodian.

VIII. 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 Executive Director of Facilities or designee will prepare and send an annual notice of school IPM program status to principals and staff who will notify 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 Executive Director of Facilities or designee will also give this information to new staff or the parents/guardians of new students upon their arrival.

The Appendix C includes the following Annual School IPM Program Notification Letter to Parents & Staff as required by **New Jersey law**.

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, (insert school name) 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."

IX. 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 PPS District IPM Coordinator, Executive Director of Facilities or designee complete all necessary forms and he Principal 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 PPS District IPM Coordinator, Executive Director of Facilities or designee will complete all necessary forms and the Principal shall 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**, Appendices D, E, F, and G.

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 Principal will advise the parents and guardians and staff of the school of pesticide applications by one of the following method of notification:

- written note that the students take home
- written note that is mailed at least one week prior to the application
- phone call
- direct contact
- email

Where: In either planned or emergency applications of non-low impact pesticides, **per New Jersey law**, the PPS School IPM Coordinator, Chief Custodian 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 is 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.

X. Record Keeping and Evaluation

Record Keeping

The PPS District IPM Coordinator and School IPM Coordinator will maintain records as listed in their outlined role and responsibility for school IPM. An initial meeting will be held between the School IPM Coordinator and Pest Management Professional(s) prior to any contractual work establish an IPM Log binder for these records.

The following records will be maintained in the IPM Log binder kept in the Regulatory binder or in the Records Folder electronically by the Chief Custodian:

- Pest Problem Reports
- Food Services Areas Reports, kept by the Director of Food Services.
- IPM Pest Activity Monitoring and Control Log
- Indoor Pest Thresholds
- IPM Priority Checklists
- Pesticide Application Log
- 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'
- School IPM Report Cards
- Specific service reports will also be placed in the log binder that document particular actions taken by the pest management contractor.

Evaluation

At least annually, the PPS District IPM Plan Program of the PPS District 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 PPS District IPM Coordinator, Executive Director of Facilities or designee . The participants in the evaluation will be: all School IPM Team members. A written evaluation is to be completed annually. If the school is

using a contractor, the PPS District IPM Coordinator, Executive Director of Facilities or designee, will meet with the pest control contractor to evaluate the success or failure of this IPM Plan.

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

- adequacy of pest control indoor and outdoor
- areas of concern
- sanitation issues
- building maintenance issues
- new less toxic pest control tactics
- adequate support by all members of the community
- adequacy of thresholds
- revise integrated pest management priorities

Following evaluation, the PPS District IPM Plan will be revised by the Executive Director of Facilities or designee accordingly and recorded in Appendix O.



APPENDIX C

Annual Integrated Pest Management Notice
For School Year 201_ - 201_

Dear Parent, Guardian, or Staff Member:

This notice is being distributed to comply with the New Jersey School Integrated Pest Management Act. [insert name of school or school district] 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 schools 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 PPS _____ is:

Name of IPM Coordinator: _____

Business Phone number: _____

Business Address: _____

The PPS District IPM Coordinator maintains the pesticide product label, and the Safety Data Sheet (SDS) (when one is available), of each pesticide product that may be used on school property. The label and the SDS 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 the Paterson Public School District 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.



APPENDIX D NOTICE OF PESTICIDE APPLICATION

For further information regarding this notice please contact the IPM Coordinator for PPS

_____ Phone Number: _____ Name _____

The following pesticides will be used at _____ School

Pesticide Common Name	Pesticide Trade Name	EPA Registration Number
Pesticide Common Name	Pesticide Trade Name	EPA Registration Number

The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: “Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure.”

Location of the pesticide application: _____

Reason for the pesticide application: _____

If an indoor application the date and time it is planned:

DATE _____ TIME _____

In the case of an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.

DATE _____

Description of the possible adverse effects of the pesticides as per the Material Safety Data Sheets for the pesticides to be used, if available:

Pesticide(s) product-label instructions and precautions related to Public Safety:



PATERSON PUBLIC SCHOOLS
APPENDIX E
Notification of the Use of Pesticides
(This notice should be received at least 72 hours prior to pesticide use)

Date: _____

To: **Parents/guardians of students, and staff of PPS #** _____

From: The PPS District IPM Coordinator: _____ Phone Number: _____

This notice is to advise you that the following pesticides will be used at _____ School

Pesticide Common Name	Pesticide Trade Name	EPA Registration Number
Pesticide Common Name	Pesticide Trade Name	EPA Registration Number

Location of the pesticide application: _____

Reason for the pesticide application: _____

If an indoor application, the date and time it is planned:

DATE _____ TIME _____

If an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.

DATE _____ DATE _____ DATE _____

Description of the possible adverse effects of the pesticides as per the Material Safety Data Sheets for the pesticides to be used, if available: _____

Pesticide product label instructions and precautions related to Public Safety.

Note: as required by law, we are advising you of the following statement:

*The Office of Pesticide Programs of the United States Environmental Protection Agency has stated:
"Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure."*



APPENDIX F
NOTICE OF EMERGENCY PESTICIDE APPLICATION

For further information regarding this notice please contact the IPM Coordinator for PPS
_____ Phone Number: _____ Name _____

The following pesticides will be used at _____ School

Pesticide Common Name	Pesticide Trade Name	EPA Registration Number
Pesticide Common Name	Pesticide Trade Name	EPA Registration Number

The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: “Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure.”

Location of the pesticide application: _____

Reason for the pesticide application: _____

If an indoor application the date and time it is planned:

DATE _____ TIME _____

In the case of an outdoor application, 3 dates must be listed, in chronological order, on which the outdoor application may take place if the preceding date is canceled.

DATE _____ DATE _____ DATE _____

Description of the possible adverse effects of the pesticides as per the Material Safety Data Sheets for the pesticides to be used, if available:

Pesticide(s) product-label instructions and precautions related to Public Safety:



PATERSON PUBLIC SCHOOLS
APPENDIX G
Emergency Pesticide Use Notification

To: Parents/guardians of students, and staff of PPS # _____

From: The PPS District IPM Coordinator: _____ Phone Number: _____

This notice is to advise you that the following pesticides were used at _____ School

Pesticide Common Name	Pesticide Trade Name	EPA Registration Number
Pesticide Common Name	Pesticide Trade Name	EPA Registration Number

Location of the pesticide application: _____

Reason for the pesticide application: _____

The Date and Time the indoor or outdoor application took place:

DATE _____ TIME _____

Description of the problem and the factors that qualified the problem as an emergency that threatened the health or safety of a student or staff member: _____

If applicable, description of steps to be taken to avoid emergency use of pesticides for this problem in the future: _____

Description of the possible adverse effects of the pesticide(s) as per the Material Safety Data Sheets for the pesticide(s) to be used, if available:

Pesticide product label instructions and precautions related to public safety:

Note: as required by law, we are advising you of the following statement:
The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure."



APPENDIX I

WEEKLY FOOD SERVICES PEST PROBLEM REPORT

DATE	TYPE OF PEST	LOCATION	KITCHEN MANAGER NAME	DATE RESOLVED

Log kept electronically and submitted to the Food Services' Chief of Operations.

APPENDIX K

IPM TEAM

PATERSON PUBLIC SCHOOL YEAR

2016-2017

STATE DISTRICT SUPERINTENDENT or designee	Eileen Shafer	973-321-1000
DISTRICT INTEGRATED PEST MANAGEMENT COORDINATOR	Executive Director of Facilities or designee	973-321-0593
EXECUTIVE DIRECTOR OF FACILITIES OR DESIGNEE	Steve Morlino, CEFM NJ Licensed Pesticide Applicator	973-321-0593
DIRECTOR OF FOOD SERVICES	David Buchholtz	973-321-0957
FOOD SERVICES CHIEF OF OPERATIONS	John Gorlach	973-321-0958
SECTOR SUPERVISORS (COVER FOR THE IPM COORDINATOR IN HIS/HER ABSENCE)	OSCAR RIVERA, CEFM JOE SOTO, CEFM Mike Cimmino, CEFM	973-321-0939 973-321-0937
Director of Facilities Maintenance & Operations	Collin Postol	862-377-3281
Building Management Assistant to Executive Director	Nickolas Moretta, CEFM	



APPENDIX L

**School Integrated Pest Management Act
Compliance Certification Form**

Name of School District: Paterson Public Schools

Address: 90 Delaware Ave.

PPS District Integrated Pest Management Coordinator: Steven Morlino #36530B

When a commercial pesticide applicator requests an integrated pest management coordinator to certify that the school has met the necessary notification and posting requirements for a pesticide application on school property, the signature of the integrated pest management coordinator on this form shall be required as a condition for the application of the pesticide.

Statement certifying compliance:

"I hereby certify that I am the school integrated pest management coordinator for the school named above, and further certify thin the District has met all of the notification and posting requirements necessary for the following application of a pesticide other than a low impact pesticide, on this school's property."

Business or pesticide applicator performing the application: _____

Application date and time if indoor application: _____

DATE

TIME

If an outdoor application, three proposed dates in chronological order: as written in the notification

Description of application location (e.g., room number/name, specific playing field or outdoor location): _____

Pesticides to be Used: _____

School Integrated Pest Management Coordinator _____

SIGNATURE

DATE



C.13:1F-25 Permitted use of certain pesticides; notice.

7. a. If a local school board, board of trustees of a charter school or principal or chief administrator of a private school, as appropriate, determines that a pesticide, other than a low impact pesticide, must be used on school property, a pesticide may be used only in accordance with this section.

b. At least 72 hours before a pesticide, other than a low impact pesticide, is used on school property, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall provide to a parent or guardian of each student enrolled at the school and each staff member of the school, notice that includes:

- (1) the common name, trade name, and federal Environmental Protection Agency registration number of the pesticide;
- (2) a description of the location of the application of the pesticide;
- (3) a description of the date and time of application, except that, in the case of outdoor pesticide applications, one notice shall include three dates, in chronological order, on which the outdoor pesticide applications may take place if the preceding date is canceled;
- (4) a statement that The Office of Pesticide Programs of the United States Environmental Protection Agency has stated: "Where possible, persons who potentially are sensitive, such as pregnant women, infants, and children, should avoid any unnecessary pesticide exposure";
- (5) a description of potential adverse effects of the pesticide based on the material safety data sheet, if available, for the pesticide;
- (6) a description of the reasons for the application of the pesticide;
- (7) the name and telephone number of the integrated pest management coordinator for the school or the school district; and
- (8) any additional label instruction and precautions related to public safety.

c. The local school board of a school district, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, may provide the notice required by subsection b. of this section by:

- (1) written notice sent home with the student and provided to each staff member;
- (2) a telephone call;
- (3) direct contact;
- (4) written notice mailed at least one week before the application; or
- (5) electronic mail.

d. If the date of the application of the pesticide must be extended beyond the period required for notice under this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall reissue the notice required under this section for the new date of application.



C.13:1F-26 Posting of sign prior to use of certain pesticides.

8. a. At least 72 hours before a pesticide, other than a low impact pesticide, is used on school property, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall post a sign that provides notice of the application of the pesticide (1) in a prominent place that is in or adjacent to the location to be treated; and (2) at each entrance to the building or school ground to be treated.
- b. A sign required pursuant to subsection a. of this section for the application of a pesticide shall (1) remain posted for at least 72 hours after the end of the treatment; (2) be at least 8 ½ inches by 11 inches; and (3) state the same information as that required for prior notification of the pesticide application pursuant to section 7 of this act.
- c. In the case of outdoor pesticide applications, each sign shall include three dates, in chronological order, on which the outdoor pesticide application may take place if the preceding date is canceled due to weather. A sign shall be posted after an outdoor pesticide application in accordance with subsection b. of this section.
- d. The requirement imposed pursuant to this section shall be in addition to any requirements imposed pursuant to the "Pesticide Control Act of 1971," P.L.1971, c.176 (C.13:1F-1 et seq.), and any rules or regulations adopted pursuant thereto.

C.13:1F-28 Emergency use of certain pesticides.

10. a. A pesticide, other than a low impact pesticide, may be applied on school property in response to an emergency, without complying with the provisions of sections 7 and 8 of this act, provided the requirements of subsection b. of this section are met.
- b. Within 24 hours after the application of a pesticide pursuant to this section, or on the morning of the next school day, whichever is earlier, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall provide to each parent or guardian of a student enrolled at the school, and staff member of the school, notice of the application of the pesticide for emergency pest control that includes: (1) the information required for a notice under section 7 of this act; (2) a description of the problem and the factors that qualified the problem as an emergency that threatened the health or safety of a student or staff member; and (3) if necessary, a description of the steps that will be taken in the future to avoid emergency application of a pesticide pursuant to this section.
- c. The local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, may provide the notice required by subsection b. of this section by: (1) written notice sent home with the student and provided to the staff member; (2) a telephone call; (3) direct contact; or (4) electronic mail.
- d. When a pesticide is applied pursuant to this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall post a sign warning of the pesticide application at the time of the application of the pesticide, in accordance with the provisions of section 8 of this act.
- e. If there is an application of a pesticide pursuant to this section, the local school board, the board of trustees of a charter school, or the principal or chief administrator of a private school, as appropriate, shall modify the school integrated pest management policy of the school or school district if necessary, to minimize the future emergency applications of pesticides under this section.



APPENDIX N

School _____

Principal _____

DESIGNATED AREA: ROOM NUMBER	DESCRIPTION OF AREA
	CAFETERIA AND KITCHEN
	Teacher's Room/Lounge
	OTHER

To be posted in common areas.

Principal Signature

Date

APPENDIX O

REVIEW AND REVISION LOG

DATE	REVISION	AUTHORIZED BY
April 17, 2012	Revised School IPM team list, pages 33-40 addition of Appendix P SOP 17.01 Bedbug protocol	Brenda Zemo
April 18, 2013	Revised School IPM Team list	Brenda Zemo
May 25, 2014	Revised School IPM Team list, p 32-40. Pages 6 and 7 will need to be revised July 1, 2014 when the new custodial company and exterminator are approved under the new contract. IPM program will reflect this change at that time. Pages 10 insert beverages, excluding water.	Brenda A. Zemo
December 8, 2015	Revised School IPM team list, page 33. Page 9 additional lines: Kitchen staff will work in conjunction with the custodial staff to ensure the breakfast in the classroom protocol is met. Office of Environmental Occupational Health and Safety has been replaced throughout the document with Facilities management	Brenda A. Zemo
December 5, 2016	Modified plan to reflect administrative changes and addition of licensed staff.	Steve Morlino
December 5, 2017	Revised plan to reflect new pest control vendor and removal of contract from the custodial services company oversight.	Steve Morlino
December 2018	Revised contact information and titles.	Steve Morlino

APPENDIX P
STANDARD OPERATING
PROCEDURES

17.01

SUPPLEMENT TO IPM

BEDBUGS IN PUBLIC
SCHOOLS

SOP 17.01

BEDBUGS IN PUBLIC SCHOOLS

I. INTRODUCTION:

What are bedbugs? They are small, flat, wingless insects with six legs that like mosquitoes, feed on blood from animals or people. They range in color from almost white to brown, but they turn rusty red after feeding. The common bedbug doesn't grow much longer than 0.2 inches and can be seen by the naked eye to the astute observer. Bedbugs get their name because they like to hide in bedding and mattresses. They can hide in beds, floors, furniture, wood and paper trash during the day. They feed on humans during the night, with peak biting time activity just before dawn. Feeding can be completed in as little as three minutes at which time they drop off the host and crawl into a hiding place. They can live for ten months and go for weeks without feeding.

Does the host know when the bedbugs are feeding? No! Bedbugs will feed on you without you waking up. You don't feel their bite because they inject a numbing agent into your body, along with an anticoagulant to keep your blood flowing as they suck. The first sign of bedbugs may be itchy, red bites on the skin, usually on the arms or shoulders. Bedbugs tend to leave straight rows of bites.

BEDBUG FACTS:

- Bedbugs can live up to one year without feeding
- Bedbugs feed every few days
- Bedbugs can reach maturity in as little as one month
- Females lay hundreds of eggs over their lifetime
- Bedbugs do not discriminate



Bed Bugs: Photo by nobugsonme on August 7, 2007



Bed Bugs: Photo by nobugsonme on August 7, 2007



Photo copied from: <http://bedbugphotos.com/>

Bed bugs are usually transparent, but turn red after feeding due to the blood they consume



© 2010 WebMD, LLC Photo of bedbug bites.

BEDBUG MYTHS PER THE US EPA

Myth: You can't see a bedbug

False: You should be able to see adult bedbugs, nymphs and eggs with your naked eye.

Myth: Bedbugs live in dirty places.

False: Bedbugs are not attracted to dirt and grime; they are attracted to warmth, blood, and carbon dioxide that humans exhale. Clutter offers more hiding spots for a bedbug and makes them more difficult to control.

Myth: Bedbugs transmit disease.

False: There are no cases that indicate bedbugs pass disease from one host to another. Lab tests have shown that it is unlikely that the insect is capable of infecting the host.

Myth: Bed bugs won't come out if the room is brightly lit.

False: While bedbugs prefer darkness, keeping the light on at night will not deter these pests from biting you.

Myth: Pesticide applications alone will easily eliminate bed bug infestations.

False: Bed bug control can only be maintained through comprehensive treatment strategy that incorporates a variety of techniques and vigilant monitoring. Proper use of pesticides may be one component of strategy, but will not eliminate bed bugs alone. Bed bugs have developed resistance to any commonly used pesticides. Some products and application methods may actually make the problem worse. Schools **MUST** consult a qualified licensed IPM pest management professional upon the discovery of bed bugs.

II. SCHOOLS AND BED BUGS

Bedbugs get into schools in a variety of ways:

- Bugs and eggs “hitchhike in” on clothing, student book bags, stuffed toys, lunch boxes, computer bags, etc....
- Infested items (furniture- couches, overstuffed arm chairs clothes, etc..) brought into the school.
- Wild animals (bats, squirrels and rodents) pets brought in to school
- Apartment to apartment, house to house then student to student then to school

- Travelers who have stayed in hotels, motels, cruise ships, and planes.

III. PROCEDURE

Bed bugs will appear in public facilities because they are able to crawl on and travel with a person and this is the case with any type of insect that has these capabilities.

- **THE IMPORTANT THING IS FOR ALL STAFF MEMBERS TO CONTINUE TO BE OBSERVANT AND NOTICE AND CATCH THE PROBLEM BEFORE IT BECOMES TOO BIG.**
- **IPM METHOD FOR BED BUG CONTROL IN SCHOOLS**
 - a. **BUILDING ADMINISTRATORS AND STAFF**
 - Inspect suspected areas and surrounding spaces
 - Observe student book bags, outer garments and clothes for signs
 - Do not allow any second hand items such as sofas or couches or chairs in your school
 - Reduce clutter in the classroom where bed bugs or insects in general can hide
 - Eliminate bed bug habitats
 - Raise awareness in school through education and prevention of bed bugs.
 - b. **CUSTODIAL STAFF**
 - Correctly identify pests so the proper target insect is being addressed
 - Keep accurate records of application dates and locations and dates monitors are put into place
 - Physically remove bed bugs through cleaning and vacuuming (dispose of vacuum bags)
 - c. **LICENSED CERTIFIED PERSONNEL**
 - PESTICIDES ARE ONLY TO BE APPLIED BY LICENSED PERSONNEL, NJDEP LAW.
 - Staff **CANNOT** bring in sprays from home. It is against the law.
- **Steps if a suspected bed bug is found**
 - a. Notify the principal or school nurse who should be the first to identify a student or staff member transporting bed bugs. The utmost discretion and

diplomacy should be used in approaching the individual, keeping in mind their right to dignity and legal considerations, it is very important to address the issue with care and sensitivity. There is no association between cleanliness and bed bug infestations. Anyone can experience an infestation.

- b. If a live insect is observed, while wearing latex gloves, grab the insect using a piece of tissue or tape or forceps. It should then be immediately attached to a piece of clear cellophane or Mylar sticky tape. The tape with the insect should be placed on a piece of plain white paper (index card) and then placed in a zip lock bag. Appendix A, bed bug specimen data form must also be filled out. The same procedure is to be used for a dead insect. If possible, **DO NOT CRUSHES THE INSECT DURING THIS PROCESS.** (hard to identify)
- c. In addition, IPM Appendix A must be completed, if the Chief Custodian is notified and Appendix J must be completed by the nurse, when the individual is brought to the Nurse's office.
- d. The next step is to determine if the SUSPECT insect is in fact a bed bug. Please notify the Paterson Public School IPM Coordinator. The nurse, principal, or chief custodian should collect all the information, prior to the IPM coordinator being notified.
- e. The IPM Coordinator will make an initial assessment and if warranted, the licensed pest control vendor will be notified.
- f. If warranted, the pest control vendor will be notified. Steps f and g then follow. If not proceed to i.
- g. The PPS IPM Coordinator will file all necessary notification under the NJAC IPM Rule. Notification will be sent to the building administrator and Chief Custodian with instructions.
- h. The pest control vendor will need access to the entire room, personal items, backpack, etc... to determine the extent of the situation.
- i. If the specimen is confirmed to be a bedbug, the principal and nurse will be notified immediately. Student belongings such as backpacks, coat, personal affects can be isolated in a tight sealing container or bags to help reduce the potential for bed bug dispersal while the problem is being resolved. **DO NOT WAIT FOR CONFIRMATION TO IMPLEMENT THIS IMPORTANT STEP.**
- j. The Executive Director of Facilities or designee is responsible for overseeing the IPM Plan in conjunction with the principals and chief custodians. The Chief Custodian is the designated person in each building. Although it is UNLIKELY for bedbugs to spread in a school environment,

an inspection will be conducted by the PPS IPM Coordinator and or the licensed IPM Pest vendor and if indicated, treatment of the area where the bedbug was found will be implemented. Monitoring stations may be placed throughout the space in question to determine and confirm if there is a need for space treatment.

- k. The Executive Director of Facilities or designee is delegated responsibility to mobilize all resources necessary through the Superintendent/Executive Director of Facilities and is responsible to keep communication lines open, providing the facts in a straightforward manner. The Chief Custodian is responsible in the event of a bed bug incident for keeping a running log of all work performed pertaining to the treatment of a pest problem. The IPM Coordinator will keep a running log of communications, directives and treatment. Together they will include, but not limited to, the following:
- Notify pest vendor to make a site visit- IPM coordinator
 - Arrange for inspection of the classroom in which the suspect bed bug is discovered- IPM Coordinator
 - Engage the vendor to carefully inspect the desks, floors, walls and storage area where student belongings are stored- Chief Custodian
 - The vendor and PPS Team should inspect crevices in baseboards, pictures, student work displays, furniture, window and door casings, wallpaper, electrical switch plate covers, telephones, clocks, wall mounts, art work etc.....
 - Look for cast skins, bug feces, and eggs near crevices
 - If warranted, the IPM pest vendor will install monitoring stations in the room if no live insects are discovered and inspect the monitors again within 24-48 hours of placement.
 - The room should be thoroughly cleaned with an approved general purpose cleaner, vacuuming with special attention to cracks, and crevices in furniture equipment, walls and floors and laundering of washables in hot water and drying on the hottest heat setting. Vacuum collection bags should be removed and sealed in plastic and then disposed of outside the school to prevent re-infestation or movement within the school.- Custodial Staff
 - Insure the IPM log book is kept current and provide a general description of work done on a daily basis during the event- Chief Custodian

- Note any unusual occurrences and items requiring follow up or clarification- IPM Coordinator/Chief Custodian
- Document any health department or PEOSH visitor or inspection. Nurse/Executive Director of Facilities or designee
- Similar to head lice, the school nurse should manage the case including re-inspecting belongings, desks, classroom etc until the problem is resolved. The IPM Coordinator and Facility staff can also assist.
- Special Permission granted by the parent or legal guardian to check children where bedbug bites are suspect. A special permission form, Appendix C should be kept on file. In an emergency situation, verbal permission from the parent should be obtained and documented.
- When investigating the source of bedbugs, it may be necessary to check the children for bedbug bites. This will ONLY be done within a limited scope: arms, lower portion of limbs and neck area.
- If a child has bedbug bites and after interviewing the parents to confirm bedbugs in the home, the nurse or principal shall notify the Paterson Board of Health. This shall be logged in the IPM Nurse Appendix.
- Student belongings such as backpacks can be isolated in a tight sealing plastic container or bags to help reduce the potential for bedbug dispersal while the problem is being resolved.
- Parents of all students in the classroom where the bedbug was found should be notified and provided with basic information about bedbugs including a description, signs and symptoms, strategies to monitor for and eliminate infestations in their home. This should include cleaning laundering, and specially designed mattress cover and box spring covers that can help entrap bed bugs and reduce harborage opportunities. The information packets should also include sources of assistance especially in multi-housing situations. Use Appendix B “sample letter”



APPENDIX A-1

BED BUG SPECIMEN DATA SUBMISSION FORM

School _____ Date _____

Name of person filing form _____ Position _____

Choose (1)

- _____ on a student
- _____ on a student's belongings
- _____ on a staff member
- _____ on a staff member's belongings
- _____ on furniture/wall within a room

- Room number _____
- Area where suspect insect
may have traveled in building _____
- School principal name _____
- School principal phone # _____

Enclosed is a suspected bed bug specimen. Please confirm the identity of this specimen so that, if appropriate, the School Nurse can notify the parent/guardian of a possible home infestation.

Comments: _____

Submitted by: _____

APPENDIX B

Sample Letter

Dear Parent or Guardian,

We have recently found a bedbug specimen in your child's classroom. Bed bugs are a nuisance, but their bites are not known to spread disease. They are usually active and feed on blood at night. The bite is usually painless; but may become swollen and itch, much like a mosquito bite. If you have concerns for you or your child you should contact your physician. On a voluntary basis, you may also wish to consider supplying your child with a plastic bag to contain his/her personal belonging while at school. This would serve as a proactive measure.

The source of bedbugs often cannot be determined, as bed bugs may be found in many places including hotels, planes, motels, trains, and movie theatres. Even though it is unlikely for bed bugs to be spread in schools, Paterson Public Schools will conduct an inspection and if indicated, treatment of the area where the bug was found.

Paterson Public Schools will continue to work to identify bed bugs, provide thorough inspections of schools and have licensed pest control specialists treat the rooms if a problem is found.

If you have any questions regarding bed bugs within your school, please contact the principal or the PPS IPM Coordinator, 973-321-0961.

- Parents may also contact the following agencies should you need further assistance for potential problems outside the school environment: PATERSON DEPARTMENT OF HEALTH, 973-321-1248
- PASSAIC COUNTY BOARD OF HEALTH, 973-321-1277
- NJ DEPARTMENT OF ENVIRONMENTAL PROTECTION, IMP COORDINATOR 609-984-6908
- NJ Department of Health and Senior Service, Bedbugs 609-826-4941

Sincerely,

Principal PPS _____



APPENDIX C

BEDBUGS ARE A POTENTIAL PROBLEM AND THE DISTRICT MUST MAKE EVERY ATTEMPT TO PINPOINT THE SOURCE.

It may be necessary in limited circumstances to examine students for bedbug bites. This will be limited to arms, lower portion of legs, neck and possibly the abdominal area.

As the parent or legal guardian of _____, I give permission for the school nurse to examine my child.

Print Name

Signature

Date

Please return to the school nurse as soon as possible.



REFERENCES:

1. Green T.A. 2010, School IPM a strategic Plan for IPM in Schools
2. US EPA website
3. Newark Public Schools, Understanding and Controlling Bedbugs, Steve Morlino
4. NYC health Department
5. NJ Department of Health and Senior Services
6. 2010 WebMD, LLC
7. <http://bedbugphotos.com/>
8. No Bugs on Me website
9. National Pesticide Information Center

CITATIONS

N.J.A.C 7:30-13.1

New Jersey Department of Environmental Protection Website Integrated Pest Management- model IPM Plan.

Plan Revised, Adopted & Approved _____

District IPM Coordinator

(Signature on File)