School Integrated Pest Management Plan
for the
_ Principle Academy Charter _**School**
insert name

for the School Year
Starting _ July 1, 2026 _**and**
insert date
Ending _ June 30, 2027
insert date

Plan prepared by: ___Ms. Shanta Green, School Director_____ Date prepared: _10/9/26____

Table of Contents

1) General School Information
2) Integrated Pest Management Statement
3) School IPM Policy
4) School IPM Plan Goals
5) Roles, Responsibilities, and Training
   a) School Administration
   b) School IPM Coordinator
   c) Pest Management Professional (staff or contractor)
   d) School Nurse
   e) Kitchen Staff
   f) Maintenance Staff
   g) Staff, Teachers, and Students
   h) Parents or Guardians of All Students Enrolled in the School
   i) Vendors and Contractors
6) Pest Identification: Site Assessment and Ongoing Monitoring
7) Pest Prevention and Control
8) Pesticide Use: Notification, Posting, and Re-Entry
9) Record Keeping and Evaluation



Appendices

- Model School IPM Policy *
- Pest Problem Report (to School IPM Coordinator)
- Food Services Areas Report (to School IPM Coordinator)
- IPM Pest Activity Monitoring and Control Log
- Sample Indoor Pest Thresholds
- IPM Priorities Checklist
- Pesticide Application Log
- Annual School IPM Program Notification Letter to Parents & Staff*
- Pre-Notification of the Use of Pesticides (72 hour pre-notification)*
- Emergency Pesticide Use Notification*
- School Integrated Pest Management Act Compliance Certification Form*
- Posting Sign (for indoors & outdoors) 'Notice of Pesticide Application'*
- 'Summary of the Key Requirements of the School IPM Act' Fact Sheet
- The New Jersey School IPM Act

* *Use of this form meets minimum compliance requirements of NJ School IPM Act*

1. **General school information:**
   School name: Principle Academy Charter
   Address: 6718 E Black Horse Pike #16 City: Egg Harbor Township
   County: Atlantic District: Principle Academy Charter Zip Code: 08234
   Phone: 609-498-6350 E-mail: info@principleac.org

   School IPM Coordinator: Ms. Shanta Green, School Director
   Email: shantagreen@principleacademycharter.org Phone: 609-498-6350

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. Principle Academy Charter 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 Policy:** Attached

4. **School IPM Plan Goals:**
   a. The roles, responsibilities, and training of all members of the school community [school administration, School IPM Coordinator, Pest Management Professional (includes staff or contractors, if used), School Nurse, kitchen staff, maintenance staff, staff, teachers, students, parents or guardians of all students enrolled in the school, and vendor/contractors] regarding IPM at the school are clearly defined.
   b. Pest identification: Initially, define indoor and outdoor pests for the school by historical account and/or by direct monitoring. Establish monitoring types and schedules, and recordkeeping.
   c. Pest prevention and control to maintain a healthy school environment: Outline non-chemical controls that will be routinely practiced at the school. Establish threshold levels for all anticipated pests. Define prescribed use of low impact versus non low impact pesticides for identified pests. Maintain records of all pesticide applications.
   d. Keep the school community informed: Maintain IPM records and make available for public inspection. Issue annual notice of school IPM program status. Establish pre-notification procedures for non low impact pesticide use. Adopt notification procedures for emergency use of non low impact pesticides. Establish posting procedures for indoor and outdoor areas that are treated with non low impact pesticides.
   e. Evaluate and revise the School IPM Plan annually.

5. **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 for the school property; the Model Policy (see Appendix) that was developed by the NJDEP prescribes that the school administrators will adopt and implement a School 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 (see next section). 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 (see next section) 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).

b. **School IPM Coordinator:**
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. (See 'IPM Pest Activity Monitoring and Control Log' for sample log).
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 (see Appendix for sample form) 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 (i.e., NJDEP-approved training).
11. 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 School IPM Coordinator by this school administration include (*check all that will be delegated*):

□ 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].

□ 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).

□ 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.

□ Prepare and send out 'Annual School IPM Program Notification Letter to Parents & Staff'. (See Appendix for sample letter) to parents & staff).

In order to carry out the duties prescribed above, the School IPM Coordinator will (*check all that apply*):

□ Distribute and train school community in the use of 'Pest Problem Report Forms' to be submitted when activity is noticed (see Appendix for sample form).

□ Distribute and train school kitchen staff in the use of 'Food Service Report' forms to be submitted weekly (see Appendix for sample form).

□ Compile all 'Pest Problem Report' and 'Food Service Report' forms received in 'IPM Pest Activity Monitoring and Control Log' (see Appendix for sample 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 (see Appendix for a sample form).

□ 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' (see Appendix) 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.

Training:
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 per rules to be adopted by the NJDEP in the fall of 2004.

c. **Pest Management Professional:**

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.

All **indoor applications** at this school are made by licensed Pest Management Professional(s). The contractor for indoor pest management services at this school is ELDER Pest Control, Inc. Our contact for the company is Dan Chila, phone number 609-328-7780. The contractor will meet all specifications as contracted by the School.

All **outdoor applications** at this school are made by licensed Pest Management Professional(s). The contractor for outdoor pest management services at this school is The contractor for indoor pest management services at this school is ELDER Pest Control, Inc. Our contact for the company is Dan Chila, phone number 609-328-7780.

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

- □ Inspect school premises for the presence of pests or signs of pest activity.
- □ Notify the IPM Coordinator when pests or signs of pest activity are found.
- □ Make written recommendations to the School IPM Coordinator for corrective actions to be taken by the school to reduce potential pest populations.
- □ Recommend to School IPM Coordinator 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, 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.
- □ Provide School IPM Coordinator with MSDS (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 kept in the PAC Board room.
- □ 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.

☐ Participate in the annual evaluation of the School IPM Program and Plan. Provide comments regarding any necessary modifications to the School IPM Plan.

Training:
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 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).

Rules are being proposed by the NJDEP that would require an additional category ("IPM in Schools") for commercial applicators that apply pesticides on school property. If these rules are adopted as final, applicators would be given a grace period during which the new category exam would need to be taken. This IPM in Schools category would be 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 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 (*check all that apply*):
☐ Keep copies and review MSDS 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 headlice (a common problem for children between 3 and 10 years old).
☐ Educate parents and staff about preventing headlice spread when it occurs.
☐ Submit a 'Pest Problem Report' to School IPM Coordinator whenever pests are detected in the health suite/Nurse's office.

Training (*check all that apply*):
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/opppmsd1/PR_Notices/pr2000-draft.htm.
☐ 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.

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 (*check all that apply*):

- □ Practice good sanitation of all kitchen and food service areas (clean all surfaces daily)
- □ Kelly Snyder, of the kitchen staff will inspect the kitchen daily.
- □ Kelly Snyder will submit a 'Pest Problem Report' to School IPM Coordinator whenever pests are detected in the kitchen and food service areas (see the Appendix for the two types of reports).
- □ Manage specific pest problem(s) as directed by the School IPM Coordinator.

Training:
Kelly Snyder 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. **Maintenance Staff:**

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 (*check all apply*):

- □ Practice all sanitation and maintenance techniques per the 'IPM Priorities' checklist of this Plan.
- □ Provide a 'Pest Problem Report' to School IPM Coordinator 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 (see the 'IPM Priorities' checklist of this Plan for specific actions for school buildings and grounds).
- □ Manage specific pest issue(s) as directed by the School IPM Coordinator. This will not include pesticide application unless the individual is a licensed Pest Management Professional (see duties in 'c' above).

Training:

- □ Bob Adams will be responsible for training the indoor Maintenance Staff in proper sanitation procedures and schedules when hired and annually thereafter.
- □ Bob Adams will train the indoor Maintenance Staff in the pest detection and monitoring program and devices in place throughout the school when hired and annually thereafter.
- □ If landscaping or turf maintenance is required by their duties, grounds maintenance staff will be trained in accepted horticultural practices grounded in IPM.

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

Duties of Staff, Teachers, & Students in the School IPM Program (*check all that apply*):

- □ 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 using the 'Pest Problem Report' form.

Training:

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

Other training (*check all that apply*):

□ Staff, teachers, and students will be given a brief overview or updates by the School IPM Coordinator 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.

Training (*check all that apply*):

□ The School IPM Coordinator 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 (see Appendix for 'Summary of Key Requirement s of NJ School IPM Act' Fact Sheet).

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 (*check all that apply*):

□ 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).

6. <u>Pest Identification: Preliminary Site Assessment and Ongoing Monitoring</u>

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. [See Appendix for the 'Pest Problem Report' form for a listing of common school pests].

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, the 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, ELDER Pest Control, Inc. 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.

Note: The Rutgers Cooperative Extension 'IPM Report Card for School Grounds' provides a series of self-assessment tools for schools to measure their adoption of IPM on school grounds. Additionally, each Report Card in the series can be used as a guide to incrementally or completely implement IPM by simply following the practices outlined. IPM practices are precisely outlined for control of common pests of New Jersey school grounds. Report Cards for School Grounds include: General Requirements; Athletic Fields; Turf ; Ornamental Plants; and Landscape Plantings. See @ http://www.pestmanagement.rutgers.edu/IPM/SchoolIPM/reportcard.html.

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 School 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 (*check all that apply*):

- ❑ 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, 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 (*check all that apply*):

- ❑ 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 or ELDER Pest Control, Inc., will maintain and keep records of any pest monitoring, including traps (see Appendix for sample 'IPM Pest Activity Monitoring and Control Log').

7. 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 (see Appendix for a sample 'Integrated Pest Management Priorities' checklist as a resource for many controls).

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'.

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 School IPM Coordinator 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 [see Appendix for a sample 'Indoor Pest Thresholds' for your modification].

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.

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 ELDER Pest Control, Inc. will meet monthly to cover monitoring reports and determine corrective action. ELDER Pest Control, Inc. 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

They will generate a pest management priority list to optimize a plan of corrective actions. The School IPM Coordinator 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 ELDER Pest Control, Inc. (see Appendix for sample 'IPM Pest Activity Monitoring and Control Log').

8. 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 provide 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 provided, 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, (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."

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 School 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 School 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 School IPM Coordinator will advise the parents and guardians and staff of the school of pesticide applications by the following method of notification (*check all that apply*).

□ 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 School IPM Coordinat 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.

9. Record Keeping and Evaluation

Record Keeping

The 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 ELDER Pest Control, Inc. at the start of each school year to establish an IPM Log binder for these records.

The following records will be maintained in the IPM Log binder kept in the Board Room (*check all that apply*):

- ❑ Pest Problem Reports
- ❑ Food Services Areas Reports
- ❑ 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
- ❑ ELDER Pest Control, Inc. 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 School IPM Plan and School IPM Program of Principle Academy Charter 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 School IPM Coordinator. The participants in the evaluation will be School IPM Coordinator, Administration, Management and School Staff. A written evaluation is to be completed by the end of the school year. If the school is using a contractor, the School IPM Coordinator 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 (*check all that apply*):

- ☐ 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
- ☐ Other:_____

Following evaluation, the School IPM Plan will be revised by Administration and Management accordingly.