



Module 6: Maintaining the School IPM Program

CHILLCOTHE
ELEMENTARY
SCHOOL

Janet A. Hurley, ACE
Senior Extension Program Specialist
Texas A&M AgriLife Extension Service

Role of the IPM Coordinator



Oversees district pest management personnel, either in-house employees or outside contractors. The coordinator ensures that employees who apply pesticides have adequate training, appropriate protective gear, and maintain all required licenses and insurance.



Ensures that all pesticides used on district property are appropriate and approved by the district for such use; and ensures that pesticides are appropriately applied, transported, and stored.



Responsible for authorizing all necessary treatments, including emergency treatments, if needed.




Maintains necessary pesticide application records, pesticide labels, Safety Data Sheets, and other required records.



Serves as a liaison between contractors and district administration to ensure that bid specifications conform to the district's IPM policy and the general principles of IPM.



Maintains a prioritized list of needed structural and landscape improvements relevant to the pest control program.



What should a successful IPM program look like?

- Maintenance priorities defined
 - Indoors building envelop vs. outdoors grounds maintenance
 - Plant health care program
 - Well-trained staff
 - Monitoring procedures defined and scheduled
 - Established thresholds
 - Integrated control plan for common pests
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Major Areas of Work

- Program Planning
 - Action plans for common pest problems
 - <https://schoolipm.tamu.edu/forms/pest-management-plans/>
- Educational Programs
 - Working with administrators to educate everyone about their role in the IPM program.
- Financial Support
 - Adequate budget support not just low bid
 - Including personnel, equipment, training, repairs
- Licensing
 - Who needs one, what will it cover, how \$\$\$\$
- Professionalism
 - Ability to communicate with others daily about their role in the IPM process. Pest management is people management.

Responsibilities & Duties

- Coordination
 - Who is responsible for what?
 - Custodial, facility bldg. repair, kitchens, classrooms
- Recordkeeping
 - Inspection reports do you use EPA Schools for Tools
 - Work order tracking for conducive conditions
 - Pesticide application records, posting and notifications
- Contractor oversight
 - Make sure you know who is “spraying” for what
 - Okay for Departments to pay for contractors, contractor must send IPM coordinator copies of all pest control records.
- Pesticide compliance
 - EPA labeled products, maintain current label and SDS documents, store out of reach of students and staff
- Administrative communication
 - Keep administrators and others apprised on what is going on with campuses.

Elements of an Effective IPM Program

- Key Questions to Ask:
 - What are the pests?
 - Ants, Cockroaches, Spiders, etc.
 - Why are they occurring?
 - How did they get in?
 - Where do they live?
 - How can we make our school less pest-friendly?
 - What treatment methods are most effective?
 - Can we use a non-chemical control



Inspection & Monitoring

- Inspection detects problems
 - Use of glue boards, insect light traps, sighting logs, work order requests, and visual inspection
- Monitoring quantifies pest activity.
 - Verifying what is caught on monitoring devices aids in detection and guiding IPM actions.
 - Sampling allows for measurement over time to determine increase or decrease in pest activity



Conducive Conditions & Cockroaches/Cardboard

Moisture, clutter, vegetation, cardboard harbor pests. Replace cardboard with plastic bins.



Sanitation & Waste Management

Reduce food, water, and harborage. Deep clean high-risk areas.



Maintenance & Pest-Proofing

Seal openings, inspect deliveries, maintain building integrity.



Entry Points

Doors, vents, utility gaps must be sealed to reduce pest entry.

Main ISO
 101915
 BUILDINGS, GROUNDS, AND EQUIPMENT MANAGEMENT
 MAINTENANCE (LOCAL)

Integrated Pest Management Program
 The District is committed to following integrated pest management (IPM) guidelines as required by Chapter 1951 of the Occupations Code and Title 4, Chapter 7 of the Administrative Code in all pest control activities that take place on District property.

Definition
 IPM is a pest management strategy that relies on accurate identification and scientific knowledge of target pests, reliable monitoring methods to assess pest presence, preventative measures to limit pest problems, and thresholds to determine when corrective control measures are needed. Under IPM, whenever economical and practical, multiple control tactics shall be used to achieve the best control of pests. These tactics shall include, but are not limited to, the judicious use of pesticides.

Standards
 The District's IPM program shall govern the District's use of pesticides, herbicides, and other chemical agents for the purpose of controlling pests, rodents, insects, and weeds in and around District facilities, including residential property primarily used as student housing.

IPM Coordinator
 The Superintendent shall designate the IPM coordinator(s), who shall be registered with the Texas Department of Agriculture. The IPM coordinator(s) shall receive training in accordance with law and shall provide training to District employees, as necessary.

Application Time Frame
 The IPM coordinator(s), in addition to the responsibilities set out in CLEBLOCAL, shall coordinate with appropriate District administrators or other designated and trained employees regarding pesticide or herbicide applications in accordance with law. The IPM coordinator(s) shall determine when an emergency situation exists and an exception to the 48-hour notice requirement may be made.

No Unauthorized Application
 If the IPM coordinator is a licensed applicator, the IPM coordinator may apply pesticides in accordance with law. No other employee or other person or entity shall be permitted to apply a pesticide or herbicide at a District facility, including residential property primarily used as student housing, without the prior approval of the IPM coordinator and other than in the manner prescribed by law and the District's IPM program.

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 CLBLLOCALA



Rules, Regulations, Policy

Posting, notification, licensing, pesticide restrictions.



Action Thresholds

- **Economics:** Act when damage cost exceeds control; e.g., ~1 carpenter bee per 5 ft.
- **Health & Safety:** Very low thresholds when risk is high (ticks, allergies, venomous pests).
- **Aesthetic:** Act when appearance is noticeably harmed; ~10% plant damage.
- **Public Opinion:** Tolerance varies; education can influence acceptance.
- **Legal:** Regulations require low tolerance in kitchens/public buildings; mandates during outbreaks.

IPM Action Plans

Step-by-step guidance for common pests using TAMU resources.

IPM Action Plan for Bed Bugs

General Information



Image of a fed bed bug, by Gary Alpert Harvard

In general, schools and childcare facilities are not likely to become infested with bed bugs. Bed bugs flourish in places where they can hide during the day and come out at night to feed on someone who is sleeping or staying quiet for an extended period of time. Because children and teachers remain active most of the day, bed bug infestations (sustainable populations of bed bugs that regularly feed and reproduce) are relatively rare in school settings. Bed bugs, however, are increasingly being introduced into schools by hiding in clothing or hitchhiking in backpacks from homes. Such bed bug introductions must be promptly and aggressively addressed to minimize concerns of parents and staff, and to reduce the risk of bed bug transfer among children. This action plan has been designed to assist with these two objectives.

Identification

Common bed bugs, *Cimex lectularius*, are small (1/16 to 3/16 inch), flattened, reddish brown-colored insects. The principal host of the common bed bug is man; however, they may be found occasionally on livestock and poultry. Few other insects look like the common bed bug, except the closely related bat bug and swallow bug, which specialize on these mammal and bird hosts, and rarely bite people.

Habits: Bed bugs are parasitic insects that feed on blood. Common bed bugs are usually found around bedrooms, hotel rooms, recliners and couches, or anywhere people sit or lie for extended times. They prefer resting in cracks and crevices during the day and between blood meals, and emerging at night to feed; however if hosts are available only during daylight hours they will feed during the day. Like other blood-feeding arthropods (ticks, fleas, and mosquitoes), bed bugs are attracted to carbon dioxide emitted by their hosts.

Monitoring and Inspection

Pest Management Plans

In TX, the school IPM rules require that schools set thresholds and have action plans in place depending on the specific pest problem. Management plans help schools and pest applicators not stay in a routine of spraying or applying the same product over and over. Management plans also help serve as guidance documents to engage other school departments, staff and teachers their roles in pest problems. Another requirement of TX school IPM rules is that school districts also have a written IPM program. A school's written IPM program is separate document from the IPM Policy statement adopted by the school board. The program document should be designed to assign more responsibility to the IPM program and assist with communication between departments.

[Setting Action Thresholds](#)

Management Plans

- [IPM Action Plan for Bark Scorpions](#)
- [IPM Action Plan for Bats](#)
- [IPM Action Plan for Bed Bugs](#)
- [IPM Action Plan for Carpenter Ants](#)
- [IPM Action Plan for Drywood Termites](#)
- [IPM Action Plan for Fire Ants](#)
- [IPM Action Plan for Formosan Subterranean Termites](#)
- [IPM Action Plan for German Cockroaches](#)
- [IPM Action Plan for Head Lice](#)
- [IPM Action Plan for Honey Bees](#)
- [IPM Action Plan for House Flies and Filth Flies](#)
- [IPM Action Plan for Mosquitoes](#)
- [IPM Mosquito Management Plan](#)
- [IPM Action Plan for Nuisance Birds](#)
- [IPM Action Plan for Outdoor Cockroaches](#)
- [IPM Action Plan for Paper Wasps](#)
- [IPM Action Plan for Rodents](#)
- [IPM Action Plan for Small Flies](#)
- [IPM Action Plan for Spiders](#)
- [IPM Action Plan for Stinging Caterpillars](#)
- [IPM Action Plan for Subterranean Termites](#)
- [IPM Action Plan for Sweet Feeding Ants](#)
- [IPM Action Plan for Tawny Crazy Ants](#)
- [IPM Action Plan for Ticks](#)
- [IPM Action Plan for Yellowjackets](#)

Other District Responsibilities

Licensed applicator requirements

- Keep up with everyone's paperwork

Parent notification

- Student Handbook & Website

Staffing roles

- Make sure teachers are aware of program
- Do you have volunteers that need training

Indoor IPM Strategies

- Indoor Pest-proofing Tips
 - Install weather stripping or door sweeps on all outside doors, including loading dock (overhead-type) doors. Inspect them regularly and replace as needed.
 - Screen or repair floor drain covers as needed.
 - Seal cracks and crevices in interior and exterior walls.
 - Caulk permanent bulletin boards, mirrors, and other wall fixtures in areas where cockroaches occur.
 - Caulk crevices around doors, windows, vents, plumbing fixtures, equipment, cabinets, and counter tops to prevent ants, roaches, and other small insects hiding in a spot..



Outdoor IPM Strategies

- Caulk, stuff, or seal openings around pipes and conduits where they enter the building.
- Check screens on all vents and seal gaps around utility penetration points in walls. Screens should be checked and maintained annually.
- Maintain a 6–12-inch, organic mulch-free observation zone around all buildings. This discourages pests, such as termites and millipedes, and permits inspection of the soil/foundation contact point. Gravel mulch is acceptable if it does not cover possible termite entry points at the slab/wall interface.
- Choose trees and shrubs whose mature size will not crowd observation zones. Dense vegetation provides good cover for rodents and makes it difficult to inspect foundations.
- Trim tree branches and vines that contact buildings. Ants, squirrels, and roof rats especially often follow branches or vines to enter a building.

Evaluation & Effectiveness

Periodic assessments using your team to review the IPM program

Look at pest control reports by campus do you see any trends

Review monitoring data, pesticide applications and staff complaints.

Preparing for TDA Audits

Maintain records, confirm pest presence, comply with policy, stay inspection-ready.

School IPM Compliance Audit Checklist

District Name:			
District Contact:			
	Yes / No	Notes	
IPM Coordinator			
The responsible person has been sent to a TDA IPM training within 6 months.			
The responsible person receives 6 hours of CEU credits every 3 years.			
The coordinator conducts periodic facility inspections.			
IPM Policy			
Is the policy maintained with the superintendent and coordinator?			
Date adopted by school board:			
Does the IPM Policy have:			
• A definition of IPM from rule 7.114			
• A reference to Texas school IPM rules			
• Information about who can apply pesticides			
• Information on who can designate, register, and be an IPM coordinator			
IPM Program			
Does the district have a monitoring program? (How do you know you have pests?)			
There is a preferential use of lower-risk pesticides and non-chemical controls.			
Record keeping: facility inspections, service tickets, pesticide applications, pesticide complaints, etc., are recorded and on file.			
There is a plan for educating staff and others about their role in the IPM program.			
Does the district have a written IPM program with thresholds and management plans?			

Is there a procedure to notify parents about pesticide applications in place?			
Is there a registry of individuals who requested to be notified?			
Pesticide Application			
Only EPA-labeled pesticides (25b) appropriate for the target pest are used.			
Pest control signs are posted at least 48 hours prior to a pesticide application inside school district buildings.			
For outdoor applications made on school district grounds, a pest control sign is displayed at the time of application.			
Are consumer information sheets available upon request?			
Pesticides used on district property are mixed outside of student areas.			
Yellow category approval forms are maintained (indoor/outdoor).			
Red category approval forms maintained (outdoor) and receive two signatures.			
Does the district use emergency waivers? Review why.			
Incidental Use for Schools			
Does the district use this process? (If yes, proceed.)			
A fact sheet is distributed to employees, and they understand its meaning.			
The IPM coordinator can provide proof of training.			
Incidental use records are maintained and on file.			
A copy of completed application use records is maintained.			
Only Green and Yellow category products are used.			
School IPM Compliance Audit Record Keeping			
IPM program records (written program and plan)			
Facility inspection reports or work orders indicating IPM needs			

Pest control application use records (indoors/outdoors)			
Look for monitoring and routine use of certain chemicals.			
Pesticide complaints			
Application Use Record Details			
Routine operational data (school, classroom, site-specific)			
Name of pesticide or devices used, EPA Reg. No. listed			
Total amount used when AI did not change (ready to use)			
Device used and total number of each device			
Mixing rate or percent of active ingredient			
Total amount of material used			
Purpose for which the pesticide was used (target pest) and evidence			
Date and time applied			
School address where applied			
Name of applicator and license numbers			
Employees Licensed			
Employees are licensed in appropriate categories.			
Employees receive appropriate CEU training annually.			
Pesticide Storage			
Where does the district store pesticides?			
Does the area have proper storage and ventilation?			
Is there a spill containment kit and spill prevention measures in place?			

FINAL COMMENTS

Questions