

Pest Management in Schools Committee Report

Annual Meeting

Point Clear, Alabama

August 29 - 31, 2011

Introduction

The Pest Management in Schools committee was established during the 2008, ASPCRO Annual Meeting in Albuquerque, NM, to address issues surrounding pest management in schools.

Key Acronyms

SIPM	School Integrated Pest Management
PESP	Pesticide Environmental Stewardship Program
PMSP	Pest Management Strategic Plan
CSREES	Cooperative State Research Education & Extension Service
NIFA	National Institute of Food & Agriculture
406 Funding	Federal funding source for IPM centers
CAR	Crops at Risk
RAMP	Risk Avoidance Mitigation Program
SAI	Strategic Agriculture Initiative

Committee Membership

The committee consists of the following individuals:

Michael Page (co-chair)	FL Dept of Ag and Consumer Services
Josh Wiley (co-chair)	Georgia Department of Agriculture
Karl Falco	DuPont
Gene Harrington	NPMA
Dennis Howard	Maryland Department of Agriculture
Janet Hurley	Texas Agrilife Extension Service
Dr. Faith Oi	University of Florida
Dan Suomi	Washington State Department of Agriculture

Mission Statement

The ASPCRO Pest Management in Schools Committee's mission is to assist member states with the improvement and implementation of Integrated Pest Management (IPM) principles and concepts in the interests of promoting and protecting Children's Environmental Safety.

Summary of Committee Actions

August 31, 2010: Committee meeting - Annual meeting in Charleston, WV to discuss topics related to:

- Development of an IPM Principles Document
- Development of a Model Inspection Protocol
 - IPM program inspection
 - Pesticide application inspection

March 17, 2011: IPM Stakeholder conference call to discuss:

- Input from stakeholders prior to EPA's strategy meeting for a national strategy for implementation

May 6, 2011: Committee Conference call to discuss topics related to:

- Mid-Year Pest Management in Schools Report
- Merchant Draft Doc on Legislation for SIPM
- EPA PPDC "EPAs Role in SIPM" strategy doc April 20, 2011
- Issues surrounding the definition of "Verifiable IPM"

July 1 – 14, 2011: Committee Review of the PMSP: *School IPM 2015* document:

- Submitted committee comments to Tom Green July 14, 2011

July 20, 2011: Conference Call to brief ASPCRO Board Members on rationale for comments

August 28, 2011: Committee Meeting - Annual meeting in Point Clear, AL to discuss topics related to:

- Discuss final draft of ASPCRO Position Paper on SIPM Legislation
- Discuss new direction for the Committee: 50 State SIPM Survey

IPM Principles Document:

The committee decided to draft a position paper related to IPM legislation. The rationale for this stemmed from a bill filed by Beyond Pesticides in the House, HR 4159, (AKA, "School Environmental Protection Act" or SEPA) and that many states were struggling with how to encourage "sane and reasonable" regulation of the use of pesticides and IPM in the Nation's schools. Mike Merchant, (TX) provided a draft document for consideration. The position paper could be used by SLAs to promote sound science-based principles of an IPM program on the federal and state level (see Attachment 1). This draft has been edited and will be submitted to the Board for discussion and approval at the Annual Meeting in Point Clear, AL.

Model Inspection Protocol:

This goal has been dropped from consideration. The rationale for doing so is related to the fact that state's already have well developed and historically established inspection standards for this purpose. In addition, the wide variance in state programs makes it difficult to develop an inspection document that could be considered a "model" in any state.

Funding Initiatives:

October 2010, EPA made a decision to focus OSCPP IPM work more explicitly on School IPM. This initiative involved the shift of significant resources (approximately \$1 million) previously used as part of the Strategic Agricultural Initiative (SAI) to focus on School IPM implementation. The direction from EPA Senior Management is to try and meet core agriculture collaboration responsibilities while initiating increased School IPM activities in 2011. The Agency's goal is to begin redirecting SAI funds by the start of FY 2012 (October 1, 2011). To that end, EPA issued a request for proposals for the implementation of IPM pest management programs in schools. Funding of grants will likely be provided through the Regions, but it appears that Headquarters has decided to be involved with the approval and award of submitted grants. Grants that are awarded funding will likely be those that include multiple state partners and agencies, and in particular, demonstrate implementation of IPM programs in schools. The strategy developed so far is to ascertain the best possible ways to meet EPA's strategic goals for implementation for "verifiable" SIPM. At this time, EPA has no plans to make implementation of IPM in schools a mandatory (federally legislated) function.

EPAs stated strategic objectives for the School IPM activities are:

- To ensure the most efficient use of our resources by having targeting key priorities;
- To seek broad and meaningful engagement and collaboration with all interested and essential parties;
- To effectively leverage and build upon the current high quality work going on across the country in school IPM;
- To continue to develop a variety of tools (such as IPM3) that will be useful to a range of parties; and
- To contribute to making School IPM effective and sustainable

Grants that will be issued will be based on implementation and not the development of new training or tools that are typically utilized by schools and those responsible for IPM in schools.

Regional Measures will include increasing the number of children (grades K-12) currently covered by a verifiable and sustainable school IPM program

Unit of measure – the number of Children (populations)

In FY12 measures will establish a baseline. This will be a Non-Commitment Measure.

Beginning in FY13, targets will be established to increase the number of children (grades K-12) covered by a verifiable and sustainable school IPM program.

In addition, as of 4/14/11 Congress passed the 2011 budget bill with a partial restoration of the Section 406 funding. The good news is that IPM Centers will receive funding, although reduced, for another year. The bad news is that CAR, RAMP and Critical Issues funding has been eliminated.

Here's how the breakdown of the restored 406 funding:

Regional Pest Management Centers are funded at \$2,994,000 (down from \$4,096,000 in FY 2010).

The Methyl Bromide Transition Program reduced from \$3,054,000 to \$1,996,000

The Organic Transition Program were reduced from \$5,000,000 to \$3,992,000

Crops at Risk (CAR, \$1,365,000 in 2010) are eliminated

FQPA Risk Mitigation Program (RAMP, \$4,388,000 in 2010) are eliminated

Critical Issues Programs (\$732,000 in 2010) are eliminated.

Our current understanding is that funding is based on required competition for distribution of the one year of Regional IPM Centers funds, and that successful applicants will probably budget to maintain operations (with the single year of funding and a potential one year no-cost extension) through August of 2013.

Defining School IPM Programs:

Another issue that warrants special mention is the push to further qualify and define school IPM by using the terms “verifiable”. A number of stakeholder groups and EPA now find this to be an important consideration when qualifying an overall IPM program in a school. Now, “verifiable IPM” will become a measure of the effectiveness and sustainability of school IPM programs. Several groups began using descriptive phrases such as “high quality” to describe IPM programs as something *more* than just an IPM program. It’s likely that these stakeholder groups encouraged the use of the terms in an effort to suggest that somehow that the implementation of a classic IPM program was only “minimal” and that, at least in a school setting, IPM programs needed to go further to be protective of children and the school environment. It is also likely that some of the stakeholders were promoting prescriptive models of IPM in an effort to gain support for or market programs developed by a specific group. The attempt to define an IPM program as “high quality” failed to garner support because the use of these descriptive terms essentially meant that a school IPM program was severely restrictive of, or eliminated the use of many EPA approved pesticides. Instead, the term high quality included and implemented a “preferred” list of products, typically those exempted by EPA (25(b) labeled products), to control pest infestations. These more prescriptive IPM programs would probably not work in states that have very high pest pressures; such as those in the southern and southwestern regions of the US.

As a result, use of a new term has evolved. The term “verifiable IPM” will be defined during FY 11-12 by EPA and stakeholder groups to include measurable criteria which will be used to assess a program’s sustainability and effectiveness. The definition will likely be agreed upon in the coming months. During FY12-13, OPP will begin collecting appropriate data to track children covered under verifiable school IPM programs.

Additional work is underway by a group called IPM³ to develop on-line IPM training for school facility managers and develop materials that help build an economic/health case for school IPM

programs. EPA felt strongly that this was needed. However, several stakeholders contend that the \$50,000 spent to develop such training may not be a good use of resources since a number of states and regions already have developed this training. In addition, it is believed that the people who need access to the training will not be able to access it due to “personal use” policies or other security concerns related to the use of school computers and accessing external websites.

Past Events:

December 12-15, 2010 - Entomology Society of America (ESA) Meeting

Mike Page spoke at a session related to building School IPM partnerships. His discussion promoted the roll SLAs play as “quality assurance officers”. Only a few states have school IPM laws that provide authority to regulators (of the structural pest control industry) to ensure schools are in compliance of IPM program criteria. Therefore, regulators responsible for structural pest control can regulate pesticide applications in schools, but not an IPM program. The responsibility for an IPM program ultimately lies with schools and school systems. The problem is school staff cannot take on additional responsibilities, nor will they. Several states have tried to address this issue with legislation, but special interest lobbies (teachers, school plant managers) have rejected it outright (schools can barely keep up with the demand to meet testing criteria). By way of example, Jarod’s Law was passed then rescinded by Ohio’s legislature as an unfunded mandate. In addition, most states report that over 70% of pest control is performed by licensed PMPs (some states it’s up to 90%). So why is there a push from some groups to force schools to do something they are not willing to do when you have a group of professionals more than capable of doing that? Conclusion, have SLA’s act in a quality assurance capacity to ensure PMPs contracted to perform pest management in schools perform IPM.

March 15, Meeting with Tom Brennan, Chief, Environmental Stewardship Branch Biopesticides and Pollution Prevention Division (BPPD)

Bonnie Rabe and Mike Page discussed the inclusion of ASPCRO as a resource in EPAs strategy for IPM implementation nationwide. We feel this makes sense, since we are best positioned as regulators of the industry directly involved with pest management in > 70% of schools nationwide. The meeting was productive and ASPCRO through its Pest Management in Schools Committee will be represented as a stakeholder in the development of EPAs School IPM strategy.

March 17, 2011 Conference Call:

There is an effort underway to collaborate with critical IPM partners on the development of EPAs strategy for IPM implementation nationwide. Facilitating that effort, a representative group of stakeholders including the IPM Institute, NPMA, RISE, Extension/Academia, ASPCRO, school plant managers and State Regulatory Agencies to assist in the development of a strategy. This conference call is an attempt to receive input from stakeholders prior to EPA management staff discussing an overall strategy. A meeting in Potomac Yard is scheduled for March 23-24, 2011.

Discussion Summary: many stakeholders agreed that schools and school districts in each state are responsible for the implementation of IPM programs in schools. There were several confounding factors contributing to the lack of IPM implementation in schools:

- Regulators responsible for regulating pesticide applications or structural pest control industries, typically state Department's of Agriculture, do not have the authority to regulate pest management programs.
- Schools are reluctant or outright refuse to accept the responsibility for developing and maintaining IPM programs for a number of reasons, most notably; education is their primary mission and; state's have no additional money to fund such a program. With only few exceptions (e.g., Texas) do regulators have authority to regulate school IPM programs. It appears that EPA is also realizing this fact.
- Forming partnerships to aid school administrators in implementing IPM programs is highly desired.

Some groups however, continue to promote the idea that school administrators, faculty and staff must develop the knowledge and skills "in house" to conduct verifiable IPM in schools and portray PMPs as only diagnosticians or educators. This however belies the reality that the PMPs maintain the expertise for providing IPM programs in schools and that, in most states, > 70% of pest management in schools is contracted/performed by the pest control industry. Clearly, a partnership approach with school officials and the PMP industry would help in the implementation of IPM in schools across the nation.

A face-to-face meeting with key stakeholders in the future has been discussed.

A full report on EPAs strategic plan for SIPM implementation should be completed before the Annual meeting in AL.

Model RFP:

Florida is developing a model request for proposal (RFP) to be used by schools and school districts to contract for IPM programs by the pest control industry. The Model RFP will be finalized soon and available by request. It is recommended that the Board post this RFP on the ASCPRO website for other states to utilize.

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