



ASPCRO SIPM Survey

“An Analysis of SIPM Laws and SLA Activities in School IPM Programs”

Michael Page



Where Are We Now?

- Regulations for schools began in 1988
- Michigan first state to pass laws specifically related to PM in schools
- Currently 39 states (and DC) have regulations that pertain to PM and IPM in schools
 - 23 states claim to have laws relating to IPM
 - 31 states have minimum competency standards
 - 25 states require prior notification of an application
 - 18 states have reentry requirements
 - 31 states have mandate posting of an application



Where Are We Now?

State School Pest Management Requirements as of June 2009								2008/2009 J Hurley Research	Data also collected from Beyondpesticides.org and the National				
State	Restricted	Interior	Outdoor	Pre-	IPM Law	Reentry or other	Min Requirements	Defines	Exempt	Defines	Training	Bill Number	Bill
Year law adopted or updated	Spray Zone	Posting	Posting	Notification	or Rule	Requirements (Beyond label)	for Applicators (Training, Certification Supervision, etc.)	Types of Products to be Used	Products from Notification	IPM	for school staff		Web
Region 1													
Connecticut-2005/2007			X	X	X(v)	X	X	X		X		SB 916; SB 5234	http://
Maine-2003/2005/2007	X	X	X	X	X	X	X	X	X	X		01-026-Chapter 27	http://
Massachusetts-2000	X	X	X	X	X	X	X	X	X	X		Child Protection Act - Chapter 85 of the Acts of	http://
New Hampshire	X		X				X					NH Code of Administrative Rules, 506.07; 508.0	
Rhode Island-2001			X	X	X	X	X	X		X		RIPCA 23-25-37 & 23-25-38	http://
Vermont-2000			X		X(v)							VT Regulations for Control of Pesticides, sectid	http://
Region 2													
New Jersey-2002	X	X	X	X	X	X	X	X	X	X	X	SCS for S137; N.J. ADMIN. CODE tit. 7 §30-10.2	http://
New York-2001			X	X	X(v)		X					NY Envir Conservation Law, sections 33-09 and	http://
Region 3													
Delaware							X						
Maryland-1999	X	X	X	X	X		X			X		15.05.02 (5-204, 5-208)	http://
Pennsylvania-2002		X	X	X	X	X	X	X	X		X	Act 2002-36 HB 1289; SB 705 (2001)	http://
Virginia		X(v)	X(v)	X(v)			X					Virginia Pesticide Control Board: Recommenda	http://
West Virginia-1996			X	X	X	X	X	X	X	X		WV Dept of Ag 61-12J.7-9	http://
Region 4													
Alabama	X						X					80-1-14-.07(8)(a)	http://
Florida-2009			X				X			X		FS 482.2265; 482.155; 482.165; 482.111	http://
Georgia		X	X			X		X	X			HB 1317; SPCC Chapter 620 - 7- 03; Georgia De	http://
Kentucky-2002			X	X	X		X	X	X			302 KAR 29:050: Kentucky Pesticide use and A	http://

Where Are We Now?

- State With law (yr adopted)
- Restricted spray zone
- Interior posting
- Outdoor posting
- Pre-notification
- IPM law or rule
- Reentry requirements
- Applicator requirements
- Types of product used
- Exempt products from notification
- Define IPM
- Training for school staff
- Specific information related to state laws/bills
- Other info



NATIONAL RESULTS

	Yes	No	Don't know	N
Written IPM policy?	50.5%	38.4%	11.1%	2479
Written IPM plan?	46.5%	49.4%	4.2%	2479
IPM coordinator?	52.3%	42.4%	5.3%	2479
- more than two years of experience?	81.5%	18.5%		1287
- are you the IPM coordinator?	68.4%	31.6%		1277
Do you have a school committee for IPM?	15.5%	78.4%	6.1%	2479
Do you track pest complaints?	41.0%	59.0%		2451
Do you track pest mgt costs?	43.6%	37.0%	19.4%	2479
Do you track number of pesticide applications?	53.6%	29.3%	17.1%	2479
Any contracted pest services? (vs. in house)				2479
- general structural	81.8%			
- general grounds	64.3%			
Only contracted pest services? (vs. in house)				2479
- general structural	50.3%			
- general grounds	34.3%			

ARE WE THERE YET?

2669 DISTRICTS + NON-PRIA ~ 25%

*With permission from IPM Institute

NATIONAL RESULTS

	Yes	No	Don't know	N
Regular/routine pesticide applications?				2422
- in or around buildings to prevent pest problems	55.5%			
- on school grounds	46.2%			
Licensed applicators only?				
- buildings	83.7%			
- grounds	79.6%			
Written pesticide application records?				
- buildings	76.2%			
- grounds	70.9%			
Pest monitoring?	71.6%			
Written records of monitoring results?	47.7%			
Accurate identification of pests before treatment?	63.2%			
Action thresholds, e.g., weeds?	45.7%			
Approved list of least-risk pesticides?	58.6%			
Regular inspections for pest-friendly conditions?				
- buildings	87.0%			
- grounds	79.5%			
IPM taught to students as part of curriculum?	8.2%			

*With permission from IPM Institute

Trends

Survey Data Indicates ...

- Uptick in schools implementing IPM program components:
 - IPM plans & policies
 - IPM coordinators
 - pest monitoring
 - inspections for pest conditions
- Schools still depend on contracted PMP services
- Posting and notification still considered part of an IPM program
- Metrics primarily monitor *pesticide use*



Things to Consider...

- Does monitoring state laws that are currently adopted nationwide really tell an accurate story of where we are with *IPM programs* in schools?
- Are state regulations driving change away from “traditional” PM and toward “verifiable” IPM in schools?
- Who is actually “doing” IPM in schools?



Things to Consider...

- IPM is a “process” for controlling pests that depends on more than the use of pesticides
- Regulating the *application of pesticides* is different than regulating an *IPM program*
- IPM is practiced on a “continuum” that requires constant “inputs”
 - Monitoring/surveillance for pests and conditions
 - Exclusion - physical (facility) improvements
 - Sanitation (kitchens, teacher lounges, classrooms)
 - Education & training (behavior modification)



Things to Consider...

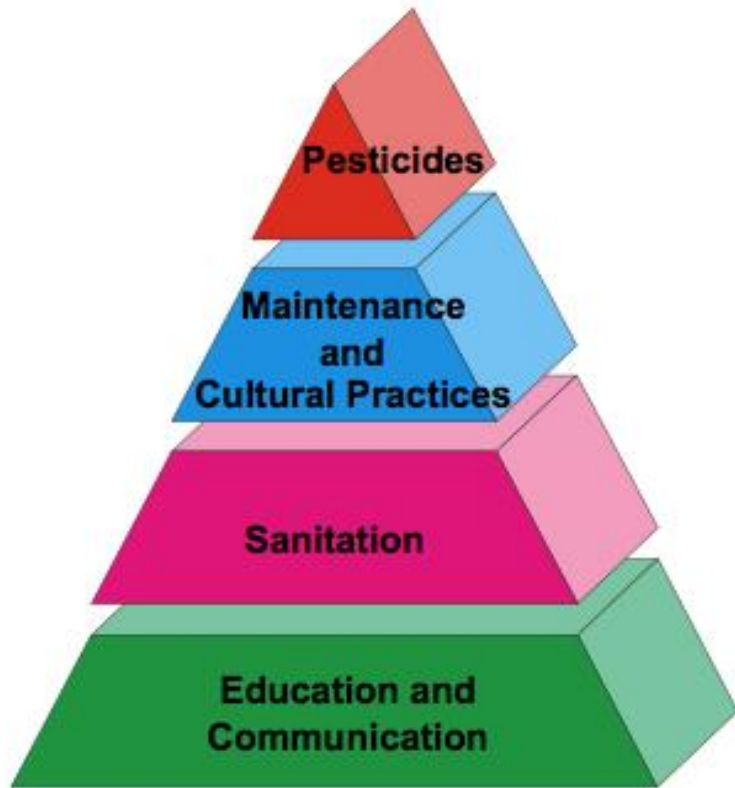
ASPCRO Resolution: “Position on Legislation”

- Encouraged states adopting laws implementing IPM Programs to include:
 - Funding
 - Applicator Licensing/Certification
 - Specific training related to IPM practices
 - Monitoring & Surveillance
 - Sanitation
 - Facilities Improvements
 - IPM Coordinator positions
 - Posting & Notification Requirements*



Things to Consider...

- What does an IPM program look like?



Definitions used in SIPM

- “**IPM**” is a sustainable approach to managing pests by combining **biological, cultural, physical** and **chemical** tools in a way that minimizes economic, health and environmental risks (*FQPA*)
- “**Verifiable School IPM**” is an *ongoing* activity that includes these documented elements:
 - **Understanding** your pests
 - **Setting action thresholds** for key pests – knowing when to take action against key pests
 - **Monitoring** for pests, their locations and populations
 - **Removing conditions** that allow pest infestation
 - **Using** one or more effective pest control methods including **sanitation, structural maintenance, and nonchemical methods** in place or in combination with **pesticides**

Things to Consider...

- The point is, we are monitoring the application of pesticides!
- Why?
 - Pesticides are easier to monitor
 - It's what SLAs regulate
 - It's the focus of attention – “nerve toxins”, “dangerous”, “asthma triggers”, “they’re evil!”...
 - Because we don’t regulate IPM Programs (components)
- “Disconnect” – between what SLAs *can do* and what we might *like to do*...



The Survey

- 10 question survey conducted early 2013
- Primarily interested in:
 - Level of States involvement with SIPM
 - If States were regulating *pesticide applications* or *IPM programs*
 - Determine the “true” number of states regulating IPM programs
 - Determine if partnerships have been established to support IPM programs in schools (theory)



Q1. Who Responded?

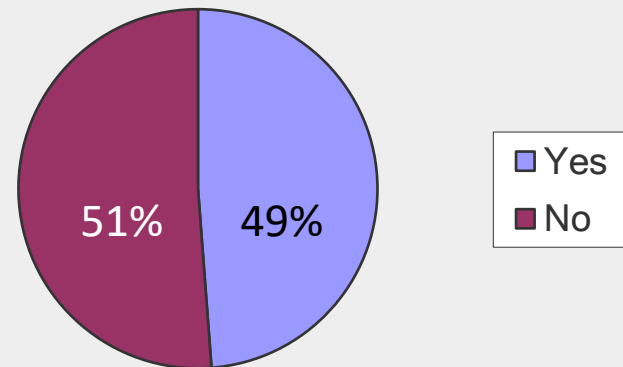
- ASPCRO has 55 members (States/Tribes/Territories)
- 43 responses (2 states 2X)
- 75% of membership responded to survey (41/55)
- MT response from Tribe
- States NOT responding:
- AL, AK, AR, ID, MA, MN, NY, ND, OK, RI, SD, UT



Q2. Laws related to SIPM Components

- “80% of states (and DC) have SIPM Laws”
- Attempted to understand what % of states had laws containing *components* of IPM:
 - Building improvements
 - Pest Monitoring
 - Pest Reporting
 - Sanitation

Does your state have a law pertaining to or requiring components of IPM be performed as the primary pest management program for schools?



100% response to this question



Q3. What are the components in these laws?

Component	Percent Response
Funding	0.0
Definition of IPM	48%
Minimum requirements for applicators	57%
Prohibiting or restricting pesticide usage	30%
Use of exempt (25(b)) products	22%
Requirements for IPM Coordinators	33%
Monitoring and Surveillance programs	37%
Sanitation program	33%
Pest Communication Logs	26%
Facilities Improvement (building envelope)	19%
Posting Requirement	67%
Notification Requirement	74%

*Only 63% responded to this question

Q3. What are the components in these laws? “Observations”

- No surprise that funding specific to an IPM program is not provided by any state responding to this survey
- Except for minimum requirements for applicators and state definition of IPM, percentage responses for IPM components appeared low
- Notification and posting requirements dominate the components of state laws



Q3. What are the components in these laws?

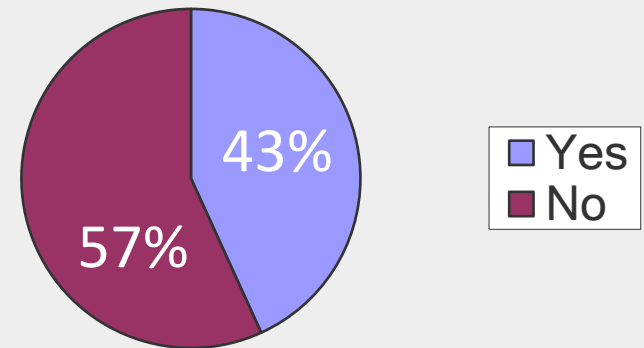
- “Other” components listed: (highest to lowest)
 - Licensing/Certification
 - Education/Training
 - Outdoor applications
 - Records of application and interventions
 - IPM Policy



Q4. Do State IPM Laws Have Enforcement Responsibility Related to IPM Programs?

- Wanted to know which states actually regulate IPM programs*
- 17 states responded yes
- However, analysis of responses indicated only 6 States actually regulate “IPM programs”

Does the law have an enforcement component which makes an agency in your state responsible for regulating IPM programs in schools?



90% of States responded (37/41)

***IPM Program** - a process for controlling pests as opposed to traditional regulation of activities: licensing, pesticide use, records, etc.

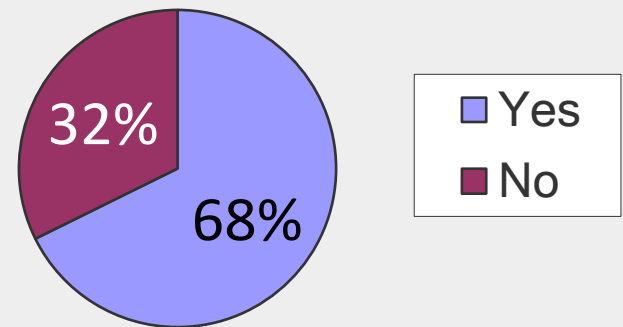
Response Comparison of States Regulating IPM Programs

State	Components	Post	Notify	Enforce?	Comment
CA	2	Y	Y		Voluntary
CT	3	Y	Y	Y	Certification/licensing, records only
DC					New law?
KY	2	Y	Y	Y	Certification/licensing only
IA		Y	Y	Y	Certification/licensing, posting only
IL	5		Y	Y	Issue fines for noncompliance with IPM program
IN	1		Y	Y	Certification/licensing only
LA	1			Y	Certification/licensing only
MD	3	Y	Y	Y	Regulate IPM programs
ME	6	Y	Y	Y	Regulate non-pesticidal control measures
MI	5	Y	Y		Voluntary
NC	3		Y		Voluntary
NJ	8	Y	Y	Y	Regulate IPM programs
NM	1	Y	Y	Y	Regulated through state DOE
PA	6	Y	Y		Voluntary
OR	9	Y	Y		Certification/licensing, IPM Plan, Records
TX	9	Y	Y	Y	Regulate IPM programs
WI	1	Y		Y	Certification/licensing, posting
WV	6	Y	Y	Y	Regulate IPM programs

Q5. Do States with No Law Volunteer?

- 31/41 states responded to this question (75%)
- 21/31 states responded in the affirmative (68%)
- States that responded were involved with
 - Training/education
 - Implementation
 - Outreach

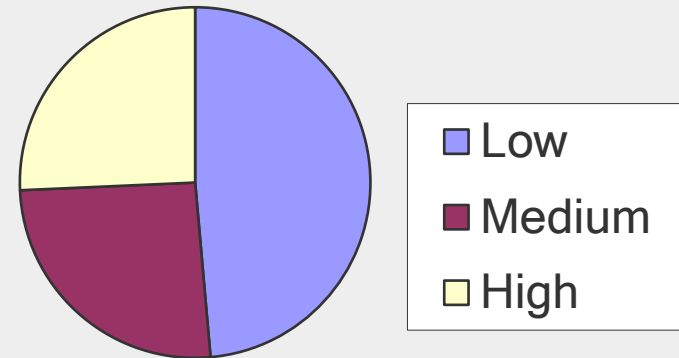
If your state does not have a law requiring IPM in schools, does your state voluntarily commit resources and personnel to support IPM implementation?



Q6. In Volunteer States What's the Priority Given to IPM?

- 36/41 states responded to this question (88%)
 - 54% – Low
 - 23% – Medium
 - 23% – High
- The fact that SLA volunteer efforts are being made is significant in itself

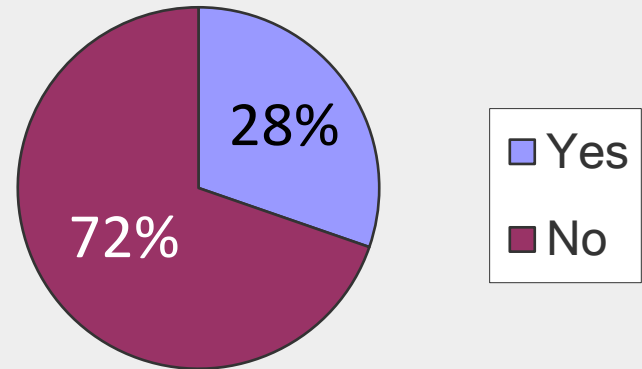
If your state does provide resources to assist with IPM implementation, what priority is given to this activity?



Q7. How are Volunteer Efforts Funded?

- 32/41 states responded (78%)
- 9/32 states responding indicated in the affirmative (28%)
- Volunteer efforts appear to be supported in a variety of ways:
 - State GR & Fees
 - EPA IPM Grants (other types)
 - Pesticide Registration
 - Fine Monies

If your state does provide resources to assist with IPM implementation, are these resources derived from your Performance Partnership Grant?



Q8. What Specific Activities By States?

Activity	Percent Response
Training	78%
Inspections	49%
Working with Extension	68%
Working with PMPs	63%
Working with School Systems (Administrators, Faculty, Staff)	66%
Special Credentialing (PMPs, School Staff)	15%

What activities are currently being undertaken in your state to assist IPM implementation in schools?

Q8. What Specific Activities By States?

- 39/41 States responded to this question (95%)
- Results from the previous table indicate that states are working in partnerships with extension, PMPs, and schools (validates theory)
- Other activities noted included:
 - Working with NGOs interested in schools (PTA)
 - Mentoring school staff
 - Offering exams for certification/licensure
 - Other state agencies: DOE, DOH, DEP, EPA Region



Q9. Partnerships to Support IPM

Partnerships	Percent Response
State/Local Department of Education	37%
State/Local Department of Health	29%
State/Local Department of Environmental Protection	13%
Extension Service	59%
EPA/Region	59%
Pest Management Professionals	66%

Has your state developed partnerships with other state or federal agencies to promote and assist IPM implementation efforts in schools?

Q9. Partnerships to Support IPM

- 39/41 States responded to the question (95%)
- Most States partner with extension and EPA Regions
- A significant number of States also partner with PMPs and DoE's
- To a lesser extent, partnerships are formed with DoHs and Environmental protection
- This finding suggests what was believed to be the existing infrastructure or “nexus” of partnerships that were working to implement IPM in schools



Q 10. Reasons Why States Do Not Volunteer Resources to Implement IPM

Reason	Percent Response
Lack of Funds	80%
Lack of Personnel	53%
Lack of Expertise	13%
Lack of Authority	40%
Lack of Law or requirement directing the activity	53%

If your state does not voluntarily commit resources and/or personnel to IPM implementation, what is the reason for not doing so?

Q 10. Reasons Why States Do Not Volunteer Resources to Implement IPM

- 15/41 States responded to this question (37%)
- A couple of States indicated that the reasons listed served as limitations to doing more for IPM implementation in their state



Observations

- Level of States involvement with SI²PM appears to be “moderate” (68% of $\frac{3}{4}$ of states responding)
- Majority of States are still regulating *pesticide applications* and not *IPM programs*
- A small number of states ($\simeq 6$) appear to be regulating IPM (components)
- Strong evidence exists that States have developed partnerships with Extension, PMPs, and Schools to support IPM programs in schools



Observations

- The data obtained from the survey are superficial, dated and require follow up with specificity to ascertain:
 - True indication of State level involvement in IPM
 - Thorough review of state laws and the components of those laws pertaining to IPM Program components (do not believe respondents understood “IPM Components”)
 - Analysis of the limitations States face in doing more to aid schools in implementing sustainable IPM programs



Questions?!

