INTEGRATED PEST MANAGEMENT PLAN

1. Purpose:
   a) When completed, this Plan meets the Healthy Schools Act requirement for an Integrated Pest Management (IPM) plan. An IPM plan is required if a Ventura County Office of Education (VCOE) uses pesticides.

2. Contact:
   Ventura County Office of Education  5189 Verdugo Way, Camarillo, CA 93012
   Name     Address
   Pamela Heron                      pheron@vcoe.org
   IPM Coordinator                   (805) 383-1916

3. IPM Statement:
   a) It is the goal of VCOE to implement IPM by focusing on long-term prevention or suppression of pests through accurate pest identification, by frequent monitoring for pest presence, by applying appropriate action levels, and by making the habitat less conducive to pests using sanitation and mechanical and physical controls. Pesticides that are effective will be used in a manner that minimizes risks to people, property, and the environment, and only after other options have been shown ineffective
   b) Our pest management objectives are to:
      1) protect the health and safety of the students and staff,
      2) to maintain a productive learning environment, and
      3) to maintain the integrity of the school buildings and grounds.

4. IPM Team:

<table>
<thead>
<tr>
<th>Name and/or Title</th>
<th>Role in IPM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gary Culver, Maintenance Manager</td>
<td>IPM Coordinator II</td>
</tr>
<tr>
<td>Pamela Heron, Risk Manager</td>
<td>IPM Administrator</td>
</tr>
<tr>
<td>Debi Carr, Purchasing Manager</td>
<td>IPM Coordinator I</td>
</tr>
</tbody>
</table>

a) Pest Management Contracting: Pest Management services are contracted to a licensed pest control business:
   • West Oaks Pest
     1746-F South Victoria Ave. #241
     Ventura, CA 93003
     (805) 320-6077
   • The Groundskeeper Inc.
     P.O. Box 3402
     Camarillo, CA 93011

Revised 07/2018
b) Prior to entering into a contract, the VCOE has confirmed that the pest control contractor understands the training requirement and other requirements of the Healthy Schools Act.

5. Pest Identification, Monitoring, and Inspection
   a) Reports from other people’s (e.g., teachers) informal observations,
   b) Monitoring as part of other tasks, with written observations,
   c) Careful inspection with written observations should be conducted when pest problems are reported.

6. Pest Management Decisions
   a) Non-Chemical Management Practices
   b) Chemical Pest Management Practices
   c) Descriptions of pest management practices can be found in Appendix B.

7. Pests and Non-Chemical Management Practices
   a) Once the IPM decision-making process is in place and monitoring indicates a pest treatment is needed, the choice of specific practices can be made. Practices that are:
      1) Least hazardous to human health;
      2) Least disruptive of natural controls in landscape situations;
      3) Least toxic to non-target organisms;
      4) Most likely to be permanent and prevent recurrence of the pest problem;
      5) Easiest to carry out safely and effectively;
      6) Most cost-effective in the short and long term;
      7) Appropriate to the weather, soils, water, and the energy resources of the site and the maintenance system.
b) When feasible, pests will be controlled without chemicals in the following manner:

<table>
<thead>
<tr>
<th>Pest</th>
<th>Remove Food</th>
<th>Fix Leaks</th>
<th>Seal Cracks</th>
<th>Install Barriers</th>
<th>Physical Removal</th>
<th>Traps</th>
<th>Manage Irrigation</th>
<th>Other*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roaches</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td>✓</td>
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<tr>
<td>Ants</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td>✓</td>
</tr>
<tr>
<td>Spiders</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
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<tr>
<td>Mice</td>
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<td></td>
<td></td>
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<td>✓</td>
</tr>
</tbody>
</table>

c) *Other non-chemical management practices:

8. Chemical Pest Management Practices
   a) If non-chemical methods are ineffective, the VCOE will consider pesticides only after careful monitoring indicates that they are needed according to pre-established action levels and will use pesticides that pose the least possible hazard and are effective in a manner that minimizes risks to people, property and the environment.
   b) A list of pesticides and active ingredients expected to be applied during the school year are found in Appendix C.
      1) This list includes pesticides that will be applied by VCOE staff or licensed pest control contractors, or both.
   c) Certain “home remedies” may be legal to be applied to control pests on school sites.
      1) Active and inert ingredients must be listed by the California Department of Pesticide Regulation
      2) Refer to appendix D, paragraph 3, for the DPR document.

9. Healthy Schools Act
   a) The VCOE complies with the notification, posting, recordkeeping, and all other requirements of the Healthy Schools Act.
      1) Notification
         a) The VCOE designee shall annually provide written notification to all staff and parents or guardians of students enrolled at a school site.
         b) Notification shall include at least the following:
            i. The name of all pesticide products expected to be applied at the school facility during the upcoming year.
            ii. The active ingredient or ingredients in each pesticide product.
iii. The opportunity for recipients to register with the VCOE if they wish to receive notification of individual pesticide applications at the school facility.

iv. Information on pesticides and pesticide use reduction developed by the Department of Pesticide Regulation can be found at: www.cdpr.ca.gov/schoolipm

v. Additional Notification Requirements

i) Persons who register for such notification shall be notified of individual pesticide applications at least 72 hours prior to the application. The notice shall include the product name, the active ingredient or ingredients in the product, and the intended date of application.

ii) If a pesticide product not included in the annual notification is subsequently intended for use at the school site, the VCOE designee shall, at least 72 hours prior to application, provide written notification of its intended use.

2) Posting

a) The VCOE designee shall post a warning sign at each area of the school site where pesticides will be applied. The warning sign shall prominently display the following:

i. The term “Warning/Pesticide Treated Area”

ii. The product name,

iii. The manufacturer’s name,

iv. The United States Environmental Protection Agency’s product registration number,

v. Intended date and areas of application, and

vi. The reason for the pesticide application.

b) The warning sign shall be visible to all persons entering the treated area and shall be posted 24 hours prior to the application and remain posted until 72 hours after the application.

c)

3) Recordkeeping

a) The district will produce and maintain records of all pesticide use at the school site for a period of four (4) years. The district chooses to meet the requirements of this section by contractors will report their own use of pesticides at school sites.

b) Exceptions to the requirements of the Healthy Schools Act are listed in Appendix D.
10. Training
   a) Every year VCOE employees who make pesticide applications receive the following training prior to pesticide use:
      1) Pesticide specific safety training (Title 3 California Code of Regulations 6724)
      2) School IPM training course approved by the Department of Pesticide Regulation (Education Code Section 16714; Food & Agricultural Code Section 13186.5)
         a) Beginning July 1, 2016

11. Submittal of Pesticide Use Reports
   a) Reports of all pesticides applied by Ventura County Office of Education staff during the calendar year, except pesticides exempt (refer to Appendix D) from HSA recordkeeping, are submitted to the Department of Pesticide Regulation at least annually, by January 30 of the following year, using the form provided at www.cdpr.ca.gov/schoolipm. (Education Code Section 16711)

12. IPM Plan Publication
   a) This IPM plan can be found online at the following web address: www.vcoe.org under Human Resources and Risk Management

13. IPM Plan Review
   a) This IPM plan will be reviewed (and revised, if needed) at least annually to ensure that the information provided is still true and correct
Appendix A, Definitions

1. “Antimicrobial” means those pesticides defined by the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 (mm)):
   a. The term “antimicrobial pesticide” means a pesticide that:
      1) Is intended to:
         a) Disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms; or
         b) Protect inanimate objects, industrial processes or systems, surfaces, water, or other chemical substances from contamination, fouling, or deterioration caused by bacteria, viruses, fungi, protozoa, algae, or slime; and
      2) In the intended use is exempt from, or otherwise not subject to, a tolerance under section 346a of title 21 or a food additive regulation under section 348 of title 21.
   b. The term “antimicrobial pesticide” does not include:
      1) A wood preservative or antifouling paint product for which a claim of pesticidal activity other than or in addition to an activity described in paragraph a. is made
      2) An agricultural fungicide product; or
      3) An aquatic herbicide product.
   c. The term “antimicrobial pesticide” does include any other chemical sterilant product (other than liquid chemical sterilant products exempt under subsection (u) of this section), any other disinfectant product, any other industrial microbiocide product, and any other preservative product that is not excluded by paragraph b.

2. “Crack and crevice treatment” means the application of small quantities of a pesticide consistent with labeling instructions in a building into openings such as those commonly found at expansion joints, between levels of construction, and between equipment and floors.

3. “Emergency conditions” means any circumstances in which the Ventura County Office of Education designee deems that the immediate use of a pesticide is necessary to protect the health and safety of students, staff, other persons, or the school site.

4. “VCOE designee” or “IPM Coordinator” means the individual identified by the VCOE to carry out the requirements of this program at the school site.

5. “School site” means any facility used for public day care, kindergarten, elementary, or secondary school purposes. The term includes the buildings or structures, playgrounds, athletic fields, school vehicles, or any other area of school property visited or used by
students. “School site” does not include any post-secondary educational facility attended by secondary students or private day care or school facilities.

6. “Integrated pest management” means a pest management strategy that focuses on long-term prevention or suppression of pests through a combination of techniques. Such techniques may include, but not be limited to:

   a. Monitoring for pest presence and establishing treatment threshold levels,
   b. Using nonchemical practices to make the habitat less conducive to pest development,
   c. Improving sanitation, and
   d. Employing mechanical and physical controls.
Appendix B, Pest Management Practices

It is particularly important around children to take the health hazards of various strategies into consideration. Hazard refers to the extent and type of negative effects of the strategy in question.

The following is a list of strategies that can be implemented to control pests using the decision tree below:

Cultural control: pest management practices which make the environment less favorable for pests. In schools, it involves changing people’s behaviors and habits such as housekeeping, sanitation, and garbage pickup schedules. It also refers to alterations in landscape design and installation and maintenance of grounds to reduce pest activity and damage.

Mechanical control: Pest control methods including cultivation and burning of vegetation or barriers and traps for vertebrate pests.

Biological control: Managing pests by using natural enemies such as predators, parasites and disease-causing organisms.

Chemical control: The use of a pesticide to reduce pest populations or activity.

The following decision tree may be used as appropriate to help determine pest management strategies.
Appendix C, list of pesticides and active ingredients

<table>
<thead>
<tr>
<th>Name of Pesticide</th>
<th>Active Ingredient(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Honcho K6 Herbicide</td>
<td>Potassium glyhosate</td>
</tr>
<tr>
<td>Bifen</td>
<td>Bifenthrin</td>
</tr>
<tr>
<td>Cynoff EC Insecticide</td>
<td>Cypermethrin</td>
</tr>
<tr>
<td>Termidor SC Termiticide Insecticide</td>
<td>Fipronil</td>
</tr>
<tr>
<td>Fumitoxin</td>
<td>Aluminum phosphide</td>
</tr>
<tr>
<td>RCO Omega Gopher Grain Bait</td>
<td>Strychnine</td>
</tr>
<tr>
<td>Contrac rodent bait</td>
<td>Bromadiolone</td>
</tr>
<tr>
<td>Fusilade II</td>
<td>Fluazifop-P-butyl</td>
</tr>
</tbody>
</table>
Appendix D, Exceptions

1. The notification, posting, and recordkeeping requirements contained herein shall not apply to a pesticide product deployed as the following:
   a. A self-contained bait or trap,
   b. Gel or paste deployed as a crack and crevice treatment,
   c. Any pesticide exempted from regulation by the United States Environmental Protection Agency pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C., Section 25 (b)), or
   d. Antimicrobial pesticides, including sanitizers and disinfectants.

2. The notification, posting, and recordkeeping requirements contained herein shall not apply to activities undertaken at a school by participants in the state program of agricultural vocational education, pursuant to Education Code Part 28, Chapter 9, Article 7, commencing with Section 52450. This exemption applies only if the activities are necessary to meet the curriculum requirements prescribed in Section 52454. Nothing in this IPM Program relieves schools participating in the state program of agricultural vocational education of any duties pursuant to this section for activities that are not directly related to the curriculum requirements of Section 52454.

3. A complete list of Pesticides except from the requirements of the Healthy Schools Act, Education Code sections 17609 through 17612, can be found at: http://apps.cdpr.ca.gov/schoolipm/school_ipm_law/exempt_products.pdf