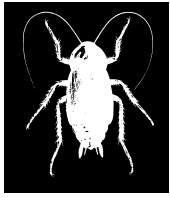




PROVIDING QUALITY PEST CONTROL SOLUTIONS FOR SCHOOLS AND INDUSTRY



# School Pest News

A Program of Texas AgriLife Extension Service — The Texas A&M System

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## New Rules for School IPM

As the new school year begins so do the new school IPM rules. The Texas Department of Agriculture Structural Pest Control Service adopted the new rules on July 7, 2009, in the Texas Register (34 TexReg 4506). Texas Administrative Code website <http://tinyurl.com/lpou78> you will find the full version of §7.150 Integrated Pest Management Program for School Districts. This article will discuss several of the key changes.

The first major change that you will notice when you read the new IPM rules is that schools must

“establish, implement and maintain an IPM *program*.” So what is an IPM program? A program, according to the rules, consists of both a policy *and* written procedures. As before, the IPM program must be established with an IPM policy. But the new rules more clearly define what is required in the policy statement. Required information must include a definition of IPM, a reference to the rules governing pesticide use in schools, information about who can apply pesticides on district property, and

information about designation, registering and training the IPM Coordinator. For this reason, you may want to re-visit your IPM policy to make sure it complies with the new rules (see sidebar on p.6).

The rules further define an IPM program as a written set of *procedures* for monitoring, thresholds for different pests, how you will ensure that lower risk pest control methods will be used, how your recordkeeping will be set up, and how you will provide education on IPM to your faculty and staff. This is a

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## Implementing an IPM Plan in your Horticulture Greenhouse

Scott Ludwig, Ph.D., Extension Program Specialist

Before developing an IPM plan in for your greenhouse or agricultural area it is important to understand the basics of an IPM program. IPM is a strategy to limit damage caused by insects, mites, diseases, weeds etc. It strives to use a combination of pest control tactics to minimize risks to human health, environment, and non-target organisms. IPM focuses on tactics that will prevent or avoid anticipated pest problems rather than trying to fix problems only after they occur. IPM is a systematic, information-

intensive approach that relies upon a basic understanding of the plants requirements for normal growth, the pest biology, and status, and how these are influenced by the production system. An IPM strategy is designed to meet an individual’s production goal in the most economically and environmentally sound manner.

Integrated pest management combines the use of mechanical, physical, cultural, biological, and chemical control methods. To properly implement an

IPM program you need to evaluate all control methods available.

**Mechanical control** employs labor and machinery to directly reduce pest abundance. These include hand-pulling weeds, soil cultivation, and trapping.

**Environmental control** is the manipulation of a crop’s environment to reduce the risk of damage due to pests. Practices for nursery producers in-

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## New Rules for School IPM

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big change and will require you to do some thinking and writing about your program, so let's talk about these different components and what they mean.

### Monitoring Program

You will have to be ready to show that you have a regular monitoring program in place. If you have a pest control company that provides you with regular service reports, you're 90% there. But other aspects of a monitoring program will include:

- Pest control logs in school offices
- Sticky cards or other monitoring devices

- Work order system that identifies pest control problems

It is common for Structural Pest Control Service inspectors to spot check kitchens to see whether sticky card monitoring devices are being used. These tools are so inexpensive and effective that it is hard to think of a good reason why a kitchen wouldn't have these devices. So, make sticky cards part of your monitoring program.

### Threshold system

The new regulations require school districts to put in writing what pest levels justify pest control action. These are known in IPM circles as thresholds. This requirement may be a big leap for

some districts that have traditionally relied on their pest control companies to decide whether pesticide applications were necessary. If you have a contractor, this means it's time to sit down and establish reasonable thresholds for your district. If you do your pest control in-house, sit down with your applicators and have the same conversation. Thresholds can be simple or sophisticated, depending on your preference and what works for you. You should maintain written thresholds for at least your most important pest problems (top 5-10 pests). To see examples of pest thresholds that you might use or modify for your district, see

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## Implementing an IPM Plan in you Horticulture Greenhouse

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clude manipulating irrigation timing and method (sprinklers vs. drip irrigation).

**Cultural controls** are modifications of normal plant care practices to limit pest problems. These include selection and use of locally adapted or pest tolerant plant species or cultivars, crop rotation, changing planting times, and the use of adequate sanitation practices.

**Biological control** is the use of beneficial organisms to control pests. Natural enemies of insect pests include pathogens, predators, and parasites. Biological control options include the conservation of naturally occurring beneficial organisms through proper selection of insecticides and the mass release of commercially available natural enemies into crops

Finally, **chemical control** is the use of pesticides to control or repel pests. Chemical control options include the use of insect growth regulators, insect pheromones, biological pesticides, and conventional chemical pesticides.

In developing an IPM plan, it is important to familiarize yourself with the growing conditions favorable to your crops and the pests to which they are susceptible. A team of individuals should develop the IPM plan. Having faculty members, IPM Coordinator, and spray personnel involved in the process will help to ensure that all areas of production are addressed. We know that in some school systems the same person will be responsible for all activities in the greenhouse. By developing your management plan before you start your crop it will be possible to discuss the plan with your employees, students and staff to ensure you have the supplies you

need.

You can divide your IPM plan into three key parts. The first part of your IPM plan should address sanitary measures before and during production. Ensuring no pests are present when you start your crop can save a lot of time and effort. The second part of your plan should cover your pest-monitoring program. A proper monitoring program is invaluable in any IPM program. Finally, determine how you will manage pests when they appear at levels that trigger a required treatment.

Sanitation is one of the keys to an IPM program. It is critical to start with a weed, pathogen, and arthropod free area. In the development of your IPM program, designate an individual who is responsible for ensuring that all the weeds have been pulled and any old media and plants are removed before a new crop is started. You will need to develop a policy that states what sanitary practices need to be followed

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## 2009 Regional IPM Coordinator Training Dates

Location	Training Date	Registration Deadline
Lubbock ISD Charles Waters Elementary School, 3006 78th Street, Lubbock, TX 79423	Oct. 7 & 8, 2009	10/02/09
Garland ISD Event Center, 4999 Naaman Forest Boulevard, Garland, TX 75040	Dec. 8 & 9, 2009	12/04/09

We are working on our 2010 dates—stay tuned

Class time is 8:30 am to 5:00 pm with an hour for lunch.

Cost: \$210 for both days, \$135 for one day only

### Day One – Required New Coordinator Training

If you're a new IPM Coordinator and have not yet taken the six-hour mandatory IPM Coordinator training, this class is for you. This class fulfills Texas state requirements for IPM Coordinators under section 7.150 of the Structural Pest Control Act. Whether this is your **first time**, or you just need a refresher course, this day will help make your school district's pest management program something to be proud of. The course will cover legal requirements for schools, an introduction to IPM, how to prepare for an inspection and a hands-on exercise conducting a pest inspection of a school campus. **This years day one training will cover the new rules**

### Day Two – Advanced Coordinator Training

Advanced training is for **both experienced and new school IPM coordinators**. This year we will be going back to basics. This full day of training will cover how to conduct a self-audit of your IPM program, updates on the newly adopted school IPM rules, and how to implement your IPM program. In addition, Dr. Merchant will be offering a session on insect ID for bees, wasps, and yellowjackets. Monitoring devices and what to look for and when to be concerned will be discussed. This training will offer CEU credits for those who are licensed under the Texas Department of Agriculture/Structural Pest Control Service.

All class participants will receive TXSPCS Laws and Regulations manual, the School IPM manual developed by Texas AgriLife Extension, and additional handouts based on subject matter. In addition, participants will conduct a facility inspection utilizing the tools and new skills learned in the class.

**For more information call 979-845-3849 or 877-747-6872**

**Register online at**

<http://agrillifevents.tamu.edu/events/index.cfm>

Or contact (979) 845-2604 for questions about registering online or paying with a purchase order

## First Annual Statewide IPM Coordinator Conference and Meeting of the Professional Association (TIPMAPS)

With the aid of EPA PESP grant to Texas AgriLife Extension – School IPM program several IPM coordinators came together to discuss the formation of a new professional association. This association will host the first ever statewide symposium for school IPM coordinators and have it's first meeting for the professionals association. The Texas Integrated Pest Management Affiliate for Public Schools (TIPMAPS) will be registering as an affiliate of Texas Association of School Business Officials (TASBO). This group has selected it's first slate of officers to run for two year terms. The officers are:

President	Tom Ohm, Frisco ISD
Vice President	Paul Duerre, Killeen ISD
Treasurer	C.G. Cezeaux, Spring ISD
Secretary	Dixie Mathews, Arlington ISD
Member at Large	Victor Melton, Carrollton Farmers Branch ISD

November 18-19, 2009

Embassy Suites Conference Center  
San Marcos, Texas

To register go online—type is Statewide in the keyword search

<http://agrillifevents.tamu.edu/index.cfm>

**Let the SWTRC help you through your pest emergency. Our faculty may be able to put you in touch with experts that can help you solve a tough problem, or can serve as a resource to whom you can refer media for accurate and helpful information.**

### “Notable Quote”

If you wish to be happy, think not of what is to come nor of that which you have no control over but rather of the now and of that which you are able to change.

Christopher Paolini, Author *Brisings*

## Advisory Committee gets briefing on TDA issues

On July 30, 2009 the Structural Pest Control Service Advisory Committee (SPCSAC) held its summer meeting with Texas Department of Agriculture (TDA) to hear updates and offer input on current activities of the agency that regulates commercial pest control in Texas.



Much of the meeting was devoted to a review of changes resulting from the recently ended legislative session in Austin. Two bills that passed this session will limit the activities that can be regulated by TDA. Falconers with permits, who use raptors to control or scare away pestiferous

wildlife, are now clearly exempt from needing a pest control license (H.B. 693, sponsored by Vicki Truitt, House District 98, Keller). A more expansive bill, (S.B. 768, sponsored by Glen Hegar, Senate District 18, Katy) added falconry (repetitive with H.B.693), chimney sweeps, use of live traps, mechanical weed removal, and installation of "non-pesticidal barriers" to the list of people and activities that are exempt from requiring a pest control license.

The most significant legislative event for TDA this year was passage of the Sunset Bill (S.B. 1016). In Texas every state agency is required to go through Sunset Review every 12 years. A Sunset committee exhaustively reviews all agencies up for review to ensure that the agencies are still needed, are performing their jobs properly, and that laws and regulations governing the agencies are up-to-date and operating efficiently. The result of this year's sunset review is that TDA has been reauthorized. In addition, a number of sections of the Agriculture and Occupations Codes have been revised to make sure that the regulations governing the agricultural and occupational (pest control) parts of TDA's regulatory authority work efficiently together.

Some of the key changes resulting from the 2009 Sunset Bill include:

- An increase in the maximum fines the Agency can impose for violations of the Agriculture or Occupational Codes. Previously the agency could fine violators \$2000 per infraction per day for a maximum of \$4000. Now the Agency can impose fines of \$5000 per infraction per day with no limit to how many days the fines can accumulate.
- Clarifying language that allows the agency to modify license renewal dates for ag and pest

control licenses, harmonize testing procedures for both ag and pest control areas, and adjust length of terms for various licenses.

- Agency is now required to conduct regular analysis of its records of complaints and pesticide violations for analysis and planning purposes.
- Agency may conduct unannounced inspections during regular business hours (Assistant Commissioner Bush assured the committee that unless there is a good reason, the agency plans to continue its policy of providing notices of inspection ahead of time).
- Clerical employees and manual laborers who are not directly involved in pesticide applications for a pest control business are no longer required to have a pesticide applicator's license.
- The need for pesticide applicators who perform pest control on growing plants, trees, shrubs and grass to obtain a nursery-floral certificate to qualify for agricultural licensing is now eliminated. Such applicators can be licensed through either the agricultural code licensing or the occupational code licensing programs.
- Allows the TDA to appoint a consumer representative to the SPCSAC without the specific recommendation of a consumer's group (TDA could get no recommendations from a Texas consumer's group when approached last year. So this provision will allow them to quickly fill the remaining slot on the SPCSAC).
- Authorized TDA to enter into reciprocal licensing agreements with other states (for CEUs, certain testing requirements, etc.)
- Changed multiple rules that required applicators to "give" or "provide" or "leave" pest control information sheets with workplaces, schools, apartments and other customers. Now the applicator is required only to "make available" the consumer information sheets to such customers. The significance of this change was discussed at some length, with some of us expressing concern that this change would encourage applicators to neglect informing their customers of the availability of these sheets, and result in fewer consumers knowing about their rights and who to contact in the case of complaints. Assistant Commissioner Jimmy Bush said that it is their hope that there is little change people receiving the information. The intent of the change was to reduce the need to provide repetitive paperwork every time a service visit is conducted and encourage electronic notifications. The essence of the discussion

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seemed to be that TDA is going to take a more relaxed attitude towards applicators providing consumer information sheets at every service visit.

In addition to updates from the legislative session, the committee discussed the new plans for CEU requirements for school IPM coordinators (SIPMC). Under the [recently updated regulations](#) that went into effect July 7, SIPMCs are required to obtain six hours of department-approved CEUs every three years. General discussion points included the question of whether a certain number of CEUs would have to be on laws and regulations, whether each CEU could be obtained separately, what criteria TDA should use in determining whether a course would qualify for a SIPMC CEU, and how the CEUs would be enforced.

The committee agreed that some of the CEUs should include laws and regulations, most of us thought that at least 2 CEUs should come from this category. The committee seemed to agree that CEUs should be available to be obtained individually, and that obtaining them electronically would be a cost-effective and environmentally sound alternative to face-to-face meetings--especially for small, isolated school districts. Some of us, however, felt that at least some CEUs should be obtained through face-to-face training--something that Jimmy Bush said could be worked into the rules. One suggestion was that the CEU requirements might be vetted through the new SIPMC association that will be organizing in November in San Marcos.

The topic of use of pesticides as part of school curricula was brought up briefly, with Jimmy Bush stating that TDA would have no objections to exemptions to the school IPM rules for pesticides used as part of school lessons or laboratory experiments. Pesticides in such cases would be handled by schools in a manner similar to any other hazardous material in a lab. Remember if it a pest of the plant or species then it falls under the Ag program, if it's a pest of man or considered a nuisance pest, like ants, then that falls under the school IPM program.

Insurance remains a hot topic between the industry and TDA. At issue is whether the current requirements do enough to protect the consumer from errors and omissions that might be made by a licensed applicator. Although some insurance policies include provisions for errors and omissions made by an applicator (e.g., not noticing a termite infestation during a wood-destroying insect (WDI) inspection), many do not. The TPCA objects to making E&O insurance a requirement due to increased costs. Apparently the only other occupation regulated by the state that is *required* to have E&O insurance is home inspection, a profession that has many similarities to pest control, especially WDI inspectors.

Mike Kelly of TDA noted that inspectors have been instructed not to review insurance policies during this time, until the department can determine its position on the kinds of liability insurance it will require for licensed businesses.

Poor or illegal termite pre-treatments is a chronic problem that numerous committees and regulators have struggled with over the years. A subcommittee of the SPCSAC began meeting after this session to start discussions on how to improve regulations of termite pre-treatments without overly burdening honest operators. If you have thoughts on this subject, you should contact me or (even better) one of the members of this subcommittee (Bill Stepan, Greg Orr, or Tommy Kezar).

These meetings are long, but very informative in knowing what is going on in the state with respect to regulations. The meetings are always open to the public. The next meeting will take place October 29 in Austin at TDA headquarters.

MEM

What would you do if you found this glueboard on a monthly visit?



Hint—German cockroaches in the kitchen

# New Rules for School IPM

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<http://schoolipm.tamu.edu/>

## Risk reduction plan

According to the new regulations each district shall preferentially use lower-risk pesticides or non-chemical management strategies to control pests. So how will you prove to an inspector that you follow this rule?

Consistent use of green category pesticides and documentation of non-chemical corrective actions would certainly show your district is following this requirement. Having and following written plans for key pests that list preferred (lower-risk) actions and less-preferred actions (e.g., non-Green category pesticides), would also show compliance. If you do use Yellow or Red category pesticides be sure to maintain your written justification forms.

## Recordkeeping plan

Good recordkeeping is essential to IPM. Under the new rules every school now needs a system for keeping records of inspections, pest-related work orders, pest control service reports and tickets, and pest and pesticide-related complaints. If you have an electronic work order system, make sure you have the capability to pull up all pest control-related work requests. Your work order system company should be able to help you set up special pest control codes, if you don't already have these. Be sure to keep all your service reports and facility inspection reports in a place where you can access them quickly and efficiently. Have you developed a system with the administrative office, school nurses and principals to ensure that you are notified of all pest *and* pesticide complaints?

## Pesticide classification

Part of a district's compliance with risk reduction under IPM is using lower risk pesticides when feasible. This is accomplished through the Green, Yellow and Red (GYR) pesticide classification system. The only change in the GYR system is to require a Caution signal word for all Green category pesticides. The most significant change in the GYR system is the change in reentry intervals and posting requirements.

Although students cannot be present when you make an application of a Green category product, they can reenter immediately after an application has been made. For example, if you use an insect growth regulator (Green) bait for fire ants on a playground, students can enter the application site as soon as you have completed the application, the spray has dried (if a liquid), or a specified label re-entry interval has expired. Yellow

category pesticides may be applied if students are not closer than 10 feet to the application site. Sites treated with Yellow category pesticides must be clearly posted or secured against reentry for four hours after application or until the reentry interval on the label has expired.

Red category pesticides may be applied if students are not present in the room or (if outdoors) within 25 feet of the application site. Sites treated with Red category pesticides must be posted or secured for eight hours after application or until the reentry interval on the label has expired.

This brief overview covers only a few of the changes, in the months to come, *School Pest News* will review more of the rule changes and how you can update your IPM program. For information about thresholds and management plans or other documents, please visit our website <http://schoolipm.tamu.edu> under the forms section.

JAH/MEM

*Sample of an outdoor posting sign*



## Sidebar: TASB Provides Assistance to Schools

The Texas Association of School Boards (TASB) has been working with the SPCS and our office to help schools with the new rules. Recently their Policy Service Division developed a recommended policy statement for school IPM programs. This revised policy statement will be sent out in the next few weeks to school boards and district superintendents. Most of you will want to replace your old policy with this new version to ensure you comply with the new IPM rules.

Also, TASB has issued a new recommended parental notification statement in their student handbook template. This statement will help you meet the new parental notification standards. These include the right of parents to be notified of pesticide applications in their child's school. For more information, or to obtain copies of these new documents, contact George Scherer at 800-580-8272.

## Implementing an IPM Plan in you Horticulture Greenhouse

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during production.

The second component of your IPM plan will be the monitoring program. Monitoring, also known as scouting, is the regular, systematic inspection of crops and growing areas. Pest monitoring is the foundation of effective IPM programs. Monitoring involves quantitative sampling on a limited number of plants, to estimate pest population size in the whole crop. Regular scouting helps to eliminate potential problems before they happen, determine the specific cause and severity of pest problems, identify locations requiring immediate treatment, and evaluate efficacy of pest control tactics.

The final component of your IPM plan should cover how to manage arthropod pests and plant pathogens. By determining in advance how you plan to manage common pest problems, you can be assured you have chemicals or biological control agents available when needed. It is important to update you chemical management program every year due to new products entering the market. Many of the new pesticides available are compatible with IPM programs in that they have a very narrow spectrum of pest susceptibility and are compatible with biological control agents. When deciding on control options, it is important to consider the plant's stage of production. For example, you would not want to make a pesticide application to control a pest which was occurring on new foliage in a crop that was about to be pruned. The pruning will most likely remove part of the insect populations. It will also be easier to reach the insects after the plant canopy has been thinned out.

In future articles we will address more specific topics related to IPM in Horticulture Greenhouses and School Ag Programs.

*Sample of a fly monitoring device for indoor plants.*



## Go Ahead! Make Our Day! STEAL This NEWSLETTER!!

The SWTRC gives permission for you (IPM Coordinators, Maintenance & Operations Directors, teachers, custodians, and other interested parties) to steal this or past newsletters. In fact, we beg you to pass this newsletter on, steal articles to use in your own school's newsletter. Our newsletters are for informational and educational purposes. Our objective is to educate everyone about IPM.

For more information contact Janet Hurley at [schoolipm@tamu.edu](mailto:schoolipm@tamu.edu) or call toll free at 877-747-6872

To find the answer to the German Cockroach question go to the forms page and look at the IPM plan for German Roaches.

The Southwest Technical Resource Center is an informational resource for all your pest control needs. We offer on site assistance (at no charge), Texas state approved IPM coordinator training, educational resources, like manuals and videos, and much, much more. We understand that you don't have time to look up every answer, that's why we're here. We are committed to helping find answers for your pest problems and will even help you organize your mandatory paperwork. We can also help you find resources for most of your other environmental quality needs. Our team of experts in entomology, plant pathology, turf management, and indoor air quality can help with most any situation.

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