



PMPs, Schools Need to Work Together



I appreciated Jim Harron's article on Georgia's efforts to assure efficacious and safe school pest management practices (see "Back to School," September 2009 PCT, page 72). Clearly, Georgia has done an outstanding job developing regulations intended to address pesticide use in schools, recognizing the extent of non-compliance by PMPs and providing technical assistance with their outreach efforts. Included in the article was a sidebar (page 78) about the National Pest

Management Association working proactively to develop legislation which provides "sensible school IPM." Combined, this information, while well intentioned, is far too much "in the box" thinking with regard to FIFRA and its state regulators. Further, it also places too much burden on the state pesticide regulator and pest management professional for the implementation of "efficacious, safe" pest management practices.

Recently Jarod's Law was passed then rescinded in Ohio as an unfunded mandate and, in my opinion, due to a lack of agency cooperation. It was a progressive environmental health law intended to protect the school community from diseases and injuries related to poor sanitation and maintenance. In content, it addressed the core of pest management as it provided comprehensive rules regarding how schools need to address waste, food, water and harborage. Acknowledging this law was imperfect (as all initial legislation is) it put prevention first and forced those responsible for the bulk of IPM implementation — the schools — to deal with conducive conditions.

The custodial, maintenance and food preparation employees who manage school facilities are normally well trained and members of their own professional associations and further, public schools normally have an annual or semi-annual inspection of the facility by an environmental health professional. As I work with school districts around the nation I teach the staff to manage pests (within their operational purview of sanitation, maintenance, food preparation and security — observing invaders) on a 24/7/365 basis because THEY are the primary implementers of pest preventive strategies regarding sanitation and exclusion. When trained correctly, they are able to communicate immediately when pest infestations occur. We teach them that they must be

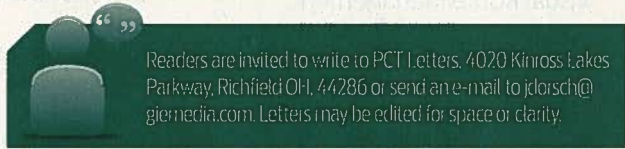
"partners in pest management" with their PMP (who I define as licensed diagnosticians/educators) — whether a contracted or an in-house employee. I know full well that historically most clients do not want this partnership but increasingly many school districts find this strategy works for reasons of risk management and cost efficiency.

By any definition of IPM, pesticides are integrated with other control strategies and used only as necessary. Understanding that cultural and mechanical controls make up the majority of school IPM and that these techniques, as TAUGHT by PMPs, are implemented by custodians, kitchen staff, nurses, grounds personnel, teachers and administrators, the public needs to look to schools to take responsibility for the implementation of "efficacious, safe" pest management practices. Thus, the school community must be receptive, educable and DEMANDING such that knowledge from PMPs be successfully applied. This institutionalization will not occur by focusing on regulations that are "pesticide-centric" and executed by regulators unfamiliar with the school institution.

Sensible legislation regarding school pest management must include environmental health regulations addressing school personnel behaviors which dominate cultural and mechanical controls, and executed by regulators familiar with schools — environmental health inspectors. Obviously, this "out of the box" thinking requires a sharing of authority by agricultural, environmental and health agencies, cross training of regulators, and a partnership with PMPs and the school community. Affected professionals and their associations must be ethical and willing partners in this endeavor. Thus, when school pest management legislation is discussed in the near future, the aspects of school environmental health regulation intended in Jarod's Law must be included along with environmental health professionals as stakeholders addressing "sensible school IPM." PCT

Marc L. Lame, Ph.D.

Clinical Professor, Indiana University
School of Public and Environmental Affairs



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