School District IPM Policies: Model Policy and Examples
Model School IPM Policy

This policy is based on IPM. It does not prohibit pesticide use. IPM does not exclude the use of pesticides, but it does encourage minimizing their use and using those that pose the least hazard. This language may be used as it appears here or it may be adapted. Some IPM policies are long and very detailed; others are more succinct. Samples in use in some California schools follow this model policy. The examples policies included are a fraction of the model policies in use by California schools. See our Web site at http://www.cdpr.ca.gov/schoolipm for more examples.

Introduction

The [insert name] School District recognizes that maintenance of a safe, clean and healthful environment for students and staff is essential to learning. It is the goal of the District to provide safe and effective, pest control while protecting students, staff, the environment, and District properties and assets.

The District adopts a Least-Hazardous Integrated Pest Management (IPM) Policy. It is the policy of the District to focus and develop long-term pest prevention methods and give “non-chemical” methods first consideration when selecting appropriate control measures. The full range of alternatives will be considered, giving preference to non-chemical methods, and then chemicals that pose the least hazard to people and the environment.

Comment: This paragraph states the intention of the district to adopt IPM.

Pest management objectives

Pests will be controlled to protect the health and safety of the students and staff; to maintain a productive learning environment; and, to maintain the integrity of the school buildings and grounds. Pest control will be economically feasible over the long term and efficacious. The Superintendent or designee shall ensure that the district follows IPM procedures so as to use the most appropriate and least-hazardous method of control. Sanitary measures shall be enforced and buildings regularly cleaned and repaired in order to prevent infestations, minimize the use of pesticides, and eliminate routine spraying.

Comment: This paragraph states that, to protect human health and environmental safety, the district plans to prevent pest infestations through sanitation and other practices consistent with IPM methods, and to eliminate routine spraying. It also notes that pest control should be economically feasible.

Definition of IPM

The Healthy Schools Act of 2000 defines IPM as “a pest management strategy that focuses on long-term prevention or suppression of pest problems through a combination of techniques such as monitoring for pest presence and establishing treatment threshold levels, using non-chemical practices to make the habitat less conducive to pest development, improving sanitation, and employing mechanical and physical controls. Pesticides that pose the least possible hazard and
are effective in a manner that minimizes risks to people, property and the environment, are used only after careful monitoring indicates that they are needed according to pre-established guidelines and treatment thresholds.” (Food and Agricultural Code section 13181)

Comment: This section defines IPM according to the Healthy Schools Act.

Elements of the Least-Hazardous IPM Policy

- Identifying and monitoring pests to determine pest population levels and identify decisions and practices that could affect pest populations.

- Setting of action levels to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken.

- Modifying and/or eliminating pest habitats to deter pest populations and minimize pest infestations.

- Considering use of a range of potential treatments for the pest problem, including physical, horticultural, and biological methods of pest control.

- Using chemical controls only as a last resort, and only those chemicals that pose the least possible hazard to people and the environment.

Comment: Monitoring, and the other elements listed, are keystones of IPM and should be an integral part of pest management procedures.

Decision-Making Process

**IPM Committee**

The District shall establish an IPM Committee to provide guidance, education and advice regarding implementation of the IPM policy. The committee will review and approve the IPM Coordinator's plan and recommendations to the School Board regarding all pest management practices. The Superintendent will appoint members of the committee which will be comprised of at least the following: Superintendent or designee, one member of the Board of Trustees, the IPM Coordinator, a parent of District-enrolled student(s) and one community member at large.

Comment: This committee can be very useful in making suggestions, doing research, and bringing in new information, but it need not have authority to make policy. It is helpful if the committee also has an independent pest management expert (preferably one trained in IPM). Having a teacher and/or principal from the district can also be helpful.

**IPM Coordinator**

The Superintendent shall designate a staff person to coordinate the IPM program. The IPM coordinator shall be educated in the principles and practice of least-hazardous IPM and be responsible for:
Oversight for the successful implementation of the program consistent with this policy and coordinate all District efforts to adopt IPM.

Overall program management and providing proposed regulations or procedures and products for use in managing pest populations.

Formal annual notification to parents, staff and students of any chemical pesticide application not exempt from requirements of the Healthy Schools Act.

Posting warning signs for pesticide applications.

Establishing and maintaining a registry of parents, staff and students who have indicated that they desire prior notification of each pesticide application.

Recordkeeping guidelines for any chemical pesticide application.

Education and training for IPM personnel.

Optional: A list of approved procedures and products.

Comment: The Healthy Schools Act requires school districts to designate a person to carry out the provisions of the law. If the district chooses to adopt IPM, this person may be called the IPM Coordinator. An IPM program will work more smoothly if someone has the job of coordinating its various elements. See also section 2.6 of this guidebook for more information on selecting and training an IPM Coordinator.

Training
Training of personnel is critical to the success of an IPM program. Staff, students, pest managers and the public shall be educated about potential school pest problems, the IPM Policy, and procedures that will be used to achieve the desired pest management objectives. Within five months of district adoption of this policy, the IPM Committee will agree on a plan to educate and train these constituencies.

Comment: Training must be included in an IPM program so that staff and students understand the changes that will be taking place, and so that personnel that must deal directly with pest management can easily secure information, tools, and techniques that will help them make the transition to IPM.

Contractors
All pest control companies contracted by the District shall follow all provisions of the policy. Licensed and certified pest control operators are required to include information on any school pesticide application that they perform as part of their otherwise applicable reporting requirements.

Comment: This paragraph states that contractors will use pest management practices consistent with IPM methods, and their pesticide use reporting will conform with the Healthy School Act requirements.
Notification, Recordkeeping and Reporting

Annual notification
The District shall annually provide to all staff, parents or guardians of pupils, enrolled at a school site, a written notification of all pesticide products to be used during the upcoming year. The notice shall identify the ingredients in each pesticide. The notice shall also contain the Internet address used to access information on pesticides and pesticide use reduction developed by the Department of Pesticide Regulation pursuant to Section 13184 of the Food and Agriculture Code.

Individual notification of pesticide application
The annual written notification shall provide the opportunity for recipients to receive notification of individual pesticide application at the school facility. The designee shall notify persons who register for such notification of individual pesticide applications at least 72 hours prior to the application. The notice shall include the product name, the active ingredients and the intended date of application.

Posting pesticide applications
The District designee shall post warning signs at each area to be treated. The sign shall include the term “Warning/Pesticide Treated Area,” the product name, manufacturers name, the EPA product registration number, date of application, area of application and the target pest. These signs shall be posted 24 hours prior to the application and remain for 72 hours after the application.

Posting approved & banned product lists (optional, see next page)

Application records
Each school site shall maintain records of pesticide use for a period of 4 years. This requirement can be met by retaining a copy of the posting sign for individual applications. These records shall be made available to the public upon request, pursuant to the California Public Records Act. (Legal Reference: Education Code, section 17611)

Emergency pesticide applications
Pest control measures taken during an emergency, i.e., wherein the school district designee deems that the immediate use of a pesticide is necessary to protect the health and safety of pupils, staff or other persons, or the school site, shall not be subject to the notification requirements herein. However, the District designee shall make every effort to provide the required notification for an application of a pesticide under emergency conditions.

Exemptions from Notification, Recordkeeping and Reporting
Some pesticide products are exempt from notification, recordkeeping and reporting requirements. Pesticide products used as a self-contained bait or trap, gel or paste deployed as a crack and crevice treatment, any pesticide exempted under FIFRA (7 U.S.C. Sec. 25 (b)), or antimicrobial pesticides, including sanitizers and disinfectants, are exempt.
Comment: This section outlines requirements of the Healthy Schools Act that all schools must implement. Notification, posting and recordkeeping addresses the public’s right-to-know. In addition, written records serve as the memory of an IPM program; thus, documenting all pest management action is very important.

Optional: Product Selection and Use Approval

Some districts have also included in their policy an additional section on Product Selection and Use Approval. Examples of these sections can be found in the Oakland Unified and Kentfield school district policies that follow.
The Kentfield School District (“District”) recognizes that maintenance of a safe, clean and healthful environment for students and staff is essential to learning. It is the goal of the District to provide for the safest and lowest risk approach to control pest problems while protecting students, staff, the environment, and District property.

The District adopts a Least-Toxic Integrated Pest Management (IPM) Policy. Pests and weeds will be controlled: to protect the health and safety of students and staff; to maintain a productive learning environment; and, to maintain the integrity of school buildings and grounds. It is the policy of the District to focus on long-term pest prevention and give non-chemical methods first consideration when selecting appropriate control techniques. The full range of alternatives will be considered, giving preference to no use of chemicals and then chemicals that pose the least possible hazard to people and the environment.

A Least-Toxic Integrated Pest Management (IPM) policy contains the following elements:

1. Monitoring to determine pest population levels and identify decisions and practices that could affect pest populations.

2. Setting of injury and action levels to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken.

3. Modification of pest habitats to deter pest populations and minimize pest infestations.

4. Consideration of a range of potential treatments for the pest problem, including physical, horticultural, and biological methods of pest control, using synthetic chemical controls only as a last resort and only those chemicals that pose the least possible hazard to people and the environment. Without prior approval by the Board, in an emergency, the District will not use any Toxicity Category I or Toxicity Category II Pesticide product, any pesticide product containing an ingredient known to the State of California to cause cancer, developmental toxicity, or reproductive toxicity, pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986, or any pesticide product containing an ingredient classified by the United States Environmental Protection Agency as a known, possible or probable human carcinogen, reproductive toxin, developmental toxin or known possible or probable endocrine disrupter.

The Superintendent shall designate a staff person to coordinate the IPM program. The IPM coordinator shall be educated in the principles and practice of least toxic IPM and be responsible for:
1. Recommending a plan to the Board in July for the following school year. Included in this plan will be:

- Overall turf management and facilities plan listing all proposed products and methods proposed for use
- Procedures for formal notification to parents, staff and students of any chemical pesticide application which will include pre-and-post signage and written notice
- Recordkeeping guidelines for any chemical pesticide application
- Education and training for IPM personnel
- List of products on an Approved List, Limited Use and Use Banned and a process to make exceptions in case of emergency to use a product not on the Approved List.

2. Overseeing implementation of the program consistent with this policy and coordinating all District efforts to adopt IPM.

3. Tracking all pesticide use and ensuring that records of pesticide use are made available to the public.

4. Presenting an annual report in June to the School Board evaluating the progress of the IPM program.
Policy Statement

The Governing Board believes that students and employees have the right to learn and work in a safe, clean and healthy environment. The District has an obligation to locate and reduce or eliminate potential risks to health and the environment, to use environmental resources in a responsible way, and to educate students and staff about environmental issues. It is the goal of the District to provide for the safest and lowest-risk approach that is effective and economically feasible and protects students, staff, the environment and District property.

The Precautionary Principle, which is the long-term objective of the District’s Least Toxic Integrated Pest Management policy, states that when an activity raises threats of harm to the environment or human health, precautionary measures will be considered. The District’s objective in adopting this policy is to institutionalize the ongoing practice of, whenever possible, not using pesticides at District operated school sites and implementing a Least Toxic Integrated Pest Management approach.

Pest Management

District buildings and grounds shall be regularly cleaned and repaired in order to prevent infestations, minimize the use of pesticides, and eliminate routine spraying.

The District adopts a Least Toxic Integrated Pest Management (IPM) Policy. Pests and weeds will be controlled to protect the health and safety of students and staff, to maintain a productive learning environment and to maintain the integrity of school buildings and grounds. It is the policy of the Board to focus on long-term pest prevention and give non-chemical methods first consideration when selecting appropriate control techniques. The full range of alternatives, including no action, will be considered first, with chemical controls used only as a last resort, giving preference to chemicals that pose the least possible hazard to people and the environment.
Integrated Pest Management Policy

The elements of the Least Toxic Integrated Pest Management (IPM) Policy are as follows:

- **Monitoring** to determine pest population levels and identify decisions and practices that could affect pest populations.

- **Setting of action levels** to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken.

- **Modifying and/or eliminating pest habitats** to deter pest populations and minimize pest infestations.

- **Considering use of a range of potential treatments** for the pest problem, including physical, horticultural, and biological methods of pest control.

- **Using chemical controls only as a last resort**, and only those chemicals that pose the least possible hazard to people and the environment. The District will not use any Toxicity Category I or Toxicity Category II pesticide product, any pesticide product containing an ingredient known to the state of California to cause cancer, developmental toxicity or reproductive toxicity pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 or any pesticide product containing an ingredient classified by the United States Environmental Protection Agency as a known, possible or probable human carcinogen, reproductive toxin, developmental toxin or endocrine disruptor, except when used in conjunction with an enclosed bait or trap on the Limited Use Products List. Prior authorization must be obtained from the Board of Trustees before any application of pesticides not on the Approved Product List (see AR, pg. 2) to District property. Board authorization will be based on the Superintendent’s recommendations incorporating the IPM Committee’s advice and review of proposed products. The Superintendent or designee may grant an emergency exemption and authorize application of pesticides pursuant to the guidelines contained in AR 3514 when IPM Committee review is not practicable.

The IPM Coordinator and Annual IPM Plan

The Superintendent shall designate a staff person to coordinate the IPM program. The IPM Coordinator shall be educated in the principles and practices of least toxic IPM and shall be responsible for providing a status report and recommended plan in April of each year to the IPM Committee. The IPM Coordinator shall provide the report and plan, incorporating the IPM Committee’s findings, to the Superintendent for submission to the Board. Included in this plan will be administrative regulations for:

- An overall IPM plan listing all proposed products and methods proposed for use.

- Procedures for formal notification to parents, staff and students of any chemical pesticide application, which will include pre- and post-application signage, written notice and a notification registry.

- Record keeping guidelines for any chemical pesticide application and ensuring that records of pesticide use are made available to the public.
■ Education and training for District personnel.
■ Emergency exemption process.
■ Record keeping guidelines for pest monitoring and for non-chemical methods used for pest control.

**IPM Committee**
The District shall establish an IPM Committee to provide guidance, education and advice regarding IPM policy procedures and practices. The Committee will meet at least annually to review and make recommendations to the Superintendent for submission to the Board regarding all pest management practices. The Committee shall be appointed by the Superintendent and will be comprised of at least the following representatives: Superintendent or designee, the District IPM Coordinator, one IPM professional, one parent of enrolled student(s), and one community and/or environmental organization representative.

**Notification**
All staff and parents or guardians of students will receive annual written notification addressing, among other things, expected use of pesticide products not on the Approved Use Products List as set forth in the IPM Coordinator’s annual turf management and facilities plan.

The District shall provide the opportunity for students, parents, staff and community members to register with the District if they wish to receive notification of planned pesticide applications at a school site. People who register for such notification shall be notified of individual pesticide applications at least 72 hours prior to application. The notice shall include the product name, the active ingredient or ingredients in the product, the intended date of application, target pest and contact with telephone number for more information. The written notice requirement is suspended in emergency situations requiring immediate action of the Superintendent or IPM Coordinator. Warning signs will be posted at the pesticide application site at least 72 hours before the application and remain posted for 72 hours after the application.

These procedures shall be regularly reviewed and updated in order to reflect changed circumstances and to assess progress in achieving District objectives. The Board encourages staff to exchange information with other districts and the County Office of Education about programs, options, and strategies for implementing this policy.

Products on the Approved Use Products List are exempt from the above-stated notification requirements.

**Legal References**
*Education Code: EC 17609 Chapter 5, Part 10.5, Article 4 commencing with Section 17608*
*Food and Agricultural Code: Article 17 of Chapter 2 of Division 7*
*Health Safety Code: Chapter 76 Division 103*
*Board Adopted: August 23, 2001*
Board Policy #B-3613

Pesticide Management Practices

Assembly Bill 2260 (Shelley) Stats 2000, Ch. 718, effective January 1, 2001 establishes the Healthy Schools Act of 2000.

The Governing Board of the New Haven Unified School District intends to implement policies and procedures consistent with AB2260. These policies and procedures shall include strategies and methods to:

1. Use the effective, least toxic method of pest control.

2. Maintain pesticide use records at each site for a period of not less than 4 years.

3. Annually provide a list to each school district site of pesticides expected to be used during the forthcoming school year to staff, parents or guardians.

4. Prior to any pesticide application, post warning signs at the school site.

5. Perform emergency applications.

6. Require that licensed and certified pest control operators include information on any school pesticide application that they perform as part of their otherwise applicable reporting requirements.

These procedures shall be regularly reviewed and updated to achieve the District objectives.

Definitions:

For the purpose of this policy, school site shall mean: any facility used for public daycare, kindergarten, elementary and secondary school purposes. The term includes the buildings, structures, playgrounds, athletic fields, school vehicles, or any other school property visited or used by pupils. Pesticide shall be defined as any economic poison.

Least Toxic Method:

The District designee shall develop an Integrated Pest Management (IPM) program and periodically review the program to ensure that the least toxic, economically feasible methods are used for pest control. This program shall incorporate both chemical and non-chemical procedures.

Notification:

1. The District shall annually provide to all staff, parents or guardians of pupils, enrolled at a school site, a written notification of all pesticide products to be used during the upcoming year. The notice shall identify the ingredients in each pesticide. The notice shall also contain the internet address used to access information on pesticides and pesticide use reduction developed by the Department of Pesticide Regulation pursuant to Section 13184 of the Food and Agriculture Code.
2. The written notification shall provide the opportunity for recipients to receive notification of individual pesticide application at the school facility. The designee shall notify persons who register for such notification of individual pesticide applications at least 72 hours prior to the application. The notice shall include the product name, the active ingredients and the intended date of application.

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

Notification pursuant to this policy shall be by the least costly manner pursuant to Education Code Section 48980.3, and shall to the extent feasible be included as part of any other written communication provided to individual parents or guardians.

**Records Maintenance:**

Each school site shall maintain records of pesticide use for a period of 4 years. This requirement can be met by retaining a copy of the posting sign for individual applications. These records shall be made available to the public upon request, pursuant to the California Public Records Act. (Legal Reference: Education Code, Section 17611)

**Posting Requirements:**

The District designee shall post warning signs at each area to be treated. The sign shall include the term “Warning/Pesticide Treated Area”, the product name, manufacturers name, the EPA product registration number, date of application, area of application and the target pest. These signs shall be posted 24 hours prior to the application and remain for 72 hours after the application.

**Emergency Pesticide Applications:**

Pest control measures taken during an emergency, i.e., wherein the school district designee deems that the immediate use of a pesticide is necessary to protect the health and safety of pupils, staff or other persons, or the school site, shall not be subject to the notification requirements herein. However, the District designee shall make every effort to provide the required notification for an application of a pesticide under emergency conditions.

**Legal Reference:**

California Education Code 17612. Notification of pesticide use 48980.3 Required notification of rights (Chapter 5 Part 10.5, Article 4 of the Education Code commencing with Section 17608; Article 17 of Chapter 2 of Division 7 of the Food and Agricultural Code; Chapter 76 Division 103 of the Health and Safety Code)

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Novato Unified School District
Board Policy

Series 3000 Bp 3514.3

Business Services

Integrated Pest Management Policy

The Novato Unified School District recognizes that maintenance of a safe, clean and healthful environment for students and staff is essential to learning. It is the goal of the District to provide the safest and lowest risk approach to control pest problems while protecting students, staff, the environment and District properties and assets.

The District adopts a Least-Toxic Integrated Pest Management (IPM) Policy. Pest will be controlled: to protect the health and safety of the students and staff; to maintain a productive learning environment; and, to maintain the integrity of the school buildings and grounds. It is the policy of the District to focus and develop long-term pest prevention methods and give “non-chemical” methods first consideration when selecting appropriate control measures. The full range of alternatives will be considered, giving preference to non-chemical methods, and then chemicals that pose the least hazard to people and the environment.

A Least-Toxic Integrated Pest Management (IPM) Policy contains the following elements:

1. Monitoring to determine pest population levels and identify decisions and practices that could effect pest populations.

2. Setting of injury and action levels to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken.

3. Modification of pest habitats to deter pest populations and minimize pest infestation.

4. Consideration of a range of potential treatments for the pest problem, including prevention, mechanical, cultural, and biological methods of pest control, using synthetic chemical controls only as a last resort and only those chemicals that pose the least possible hazard to people and the environment.

5. Establish a committee to provide guidance, education and support regarding IPM procedures. Members of the committee will be appointed by the Superintendent and may include the following: Superintendent or designee, Board Member, IPM Coordinator, parent, certificated staff member, classified staff member and one community member at large.

6. Abstain from using any pesticide product containing an ingredient known to the State of California to cause cancer, developmental toxicity, or reproductive toxicity, pursuant to the
California Safe Drinking Water and Toxic Enforcement Act of 1986, or any pesticide product containing an ingredient classified by the United States Environmental Protection Agency as a known human carcinogen, reproductive toxin, developmental toxin or endocrine disrupter.

The Superintendent shall designate a staff person to coordinate the IPM program. The IPM coordinator shall be educated in the principles and practice of least toxic IPM and be responsible to provide:

- Oversight for the successful implementation of the program consistent with this policy and coordinate all District efforts to adopt IPM.
- Overall program management and provide proposed procedures and products for use in managing pest populations.
- Formal notification to parents, staff and students of any chemical pesticide application including pre-and-post signage.
- Establish and maintain a registry of parents, staff and students that have indicated they desire notification 72 hours prior to pesticide applications.
- Record-keeping guidelines for any chemical pesticide application.
- Education and training for IPM personnel.
- A list of approved procedures and products.

Legal References:

EDUCATION CODE
17608 - 17613 Healthy Schools Act of 2000

FOOD AND AGRICULTURAL CODE
13180 Healthy Schools Act of 2000
San Diego Unified School District
IPM Policy

(This policy was adopted on October 22, 1991, by the San Diego Unified School District.)

Structural and landscape pests can pose a significant problem to people and the environment. Hazardous pest control chemicals can also pose a significant problem to people and the environment. It is therefore the policy of the San Diego Unified School district to incorporate Integrated Pest Management (IPM) procedures for the control of structural and landscape pests. IPM means that pest problems will be alleviated with the least possible hazard to people, property, and the environment by using IPM methods that are safe, effective and economically feasible. Pesticides will be carefully evaluated before use and will only be used after non-hazardous and other safer methods have been considered.

Integrated Pest Management will include the following components:

1. Educate staff, students and the public about school pest problems and the Integrated Pest Management policies.

2. Develop plant inventory and pest problem survey procedures.

3. Identify pests that are considered public health problems and methods to prevent them in the least hazardous way from becoming a health problem.

4. Identify and evaluate cultural/environmental conditions on the grounds that encourage pest problems. Make recommendations for remedial action.

5. Monitor population levels of pests to determine treatment procedures.

6. Review all available options for acceptability and/or feasibility before the use of a chemical pesticide; cost of staffing considerations alone will not be the sole justification for use of chemical control agents. Records of IPM strategies considered prior to chemical treatment will be maintained.

7. Ensure that pesticide applicators whether in-house or contracted are educated and trained in the use of current pesticides approved for use by the SDUSD and that they follow label precautions and application regulations. Contracted companies are to be in compliance with the San Diego Unified School District’s Integrated Pest Management policy.

8. Establish and maintain pesticide use reporting and recordkeeping procedures.


10. Make information accessible to the public and employees regarding pesticides used and area treated.

11. Eliminate fire potential (e.g. tall, dry grass, dead trees) in the safest and most timely manner using available resources.
Additional Model School IPM Policies are available by viewing the following links:

Los Angeles Unified School District IPM Policy
http://www.calisafe.org/pdf/policy_and_forms.pdf

Marin County Model IPM Policy Statement for Schools
http://www.co.marin.ca.us/depts/AG/main/ipm/policystatement.pdf

Nevada County School District
http://www.beyondpesticides.org/schools/schoolpolicies/local%20policies/NevadaCountyCA.pdf

Oxnard Union High School District
http://www.beyondpesticides.org/schools/schoolpolicies/local%20policies/Oxnard_CA.pdf

Ventura Unified School District
http://www.beyondpesticides.org/schools/schoolpolicies/local%20policies/Ventura.pdf