

North Carolina Guidelines for Notification of Pesticide Use at a Public School or Other Public School District Facility

I. Annual Notification *(see sample form 1)*

The School Children's Health Act (HB 1502) requires public school systems to annually notify students' parents, guardians, or custodians (PGCs) and all members of school staff of pesticide use on school grounds (The term "pesticide" refers to any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Though often misunderstood to refer only to insecticides, the term pesticide also applies to herbicides, fungicides, and various other substances used to control pests). This annual notice should be made in print, by mail or in person, should be in English and also in Spanish, and should include:

- a. The name, position, phone number, and email address of the school system's Integrated Pest Management (IPM) coordinator.
- a. The name, position, phone number, and email address of the on-site contact for questions about pest problems or pesticide use at a particular school or facility.
- a. One copy of the school district's current Integrated Pest Management policy/policies, or a statement of the school district's plans and timeline for adopting such a policy.
- a. A list of scheduled applications* of non-exempt pesticide products** at the relevant school or other site, if any, for the entire calendar year. This list should also be kept on file at that site and be viewable by request.
 - i. For each pesticide product scheduled for application during the calendar year, if any, include the scheduled date and time of application, area of application, the product brand name(s), pesticide common name(s), and EPA registration number(s).
- a. Notice of students' PGCs, and of school staff members' right to be notified at least 72 hours in advance of application of non-exempt pesticide products that do not appear on the annual schedule for the relevant school site, upon written request.
- f. Explicit instructions for requesting this notification, instructions for renewing and/or updating this request in the future, and one copy of any form that the district requires PGC's to fill out in order to request advance notification *(see sample form 2)*.**

II. Notification of Non-Exempt Pesticide Use *(see sample form 3)*

To the extent possible, notice to parties who have requested it (see I.e. and I.f., above) must be made no less than 72 hours (3 days) in advance of the use of a non-exempt pesticide product that did not appear on the annual schedule of pesticide applications.** Notice can be made by mail, by phone, and/or by email, and it is suggested that parents and staff are given their choice of notification method, with the stipulation that the school district should not be held liable in case people do not receive the notification because of spam blockers, full inboxes, malfunctioning or discontinued voicemail and email services, or changed contact information that they have not yet informed the school system about. Notice should include:

- a. The name, position, phone number, and email address of the school system's IPM coordinator and on-site contact (see I.a. and I.b., above).
- b. The product brand name, pesticide common name (if any), and EPA registration number for pesticide(s) to be applied.
- c. The scheduled time and date of the application, and rain date(s) in the case an outdoor application must be rescheduled due to the weather.
- d. The reason for application, steps that the school system is taking to prevent this pest problem in the future, and any steps PGCs and school staff can take to help prevent this problem in the future.
- e. Information from the product's label and MSDS about possible harmful effects of exposure to this product, and public safety precautions.
- f. Any advice from the IPM coordinator, school health staff, or other source on limiting risk of exposure to these pesticides.

III. Emergency Notification of Non-Exempt Pesticide Use (*see sample form 4*)

In case of a pest control emergency, in which there is not adequate time to notify parties who have requested it, emergency notice can be made less than 72 hours in advance, or as soon as possible after the non-exempt pesticide product is applied.** Emergency notice must include:

- a. All information included in a regular Notification of Non-Exempt Pesticide Use (see II. a. through f., above).
- b. Description of the factors that qualified this pest problem as an emergency.
- c. Description of steps the school system is taking to avoid emergency use of pesticides for this reason in the future, and any steps PGCs and school staff can take to help.

* An Integrated Pest Management (IPM) program at a public school would typically not include any high-hazard pesticide applications which are scheduled far in advance. The inclusion of an annual pesticide application schedule in notification requirements is not meant to imply that such schedules are needed or recommended, as in fact they are not. However, a school district that is still applying pesticides on a schedule during the transition to IPM should provide annual notice of this schedule. Also, some products regularly used for cleaning by schools may technically qualify as pesticide products. Notice of the regular schedule for use of such products prevents the need for notification every time one is used.

** Notification requirements apply to all non-exempt pesticide applications at the relevant school or other non-school site (office building, garage, workshop, etc.), both indoor and outdoor pesticide applications, and including applications planned for summer recess, holidays, weekends, or after school. Pesticide products exempt from notification requirements include: antimicrobial cleansers, disinfectants, self-contained baits and crack-and-crevice treatments, and any pesticide products classified by the United States Environmental Protection Agency (EPA) as belonging to the US EPA Toxicity Class IV, "relatively nontoxic." All other pesticide products used on school grounds are subject to notification requirements.