

CEHPAC IAQ & Schools Workgroup Report

March 17, 2023

The IAQ and Schools Workgroup had two meetings since the last CEHPAC meeting. Our members continue to focus and dedicate our time to identifying the various ways that CEHPAC can be of service to the children of Maryland in the places where they spend the most time outside of home.

We have spent a lot of time reviewing the attached "Summary of Findings," provided as the Workgroup Status Report. This is in response to CEHPAC's ask of this Workgroup to review the December 1, 2022 Maryland Department of Agriculture's Joint Chairmen's Report on IPM in Schools Report, and provide our feedback. At our last meeting a vote was taken to send this spreadsheet along to CEHPAC members, which the majority agreed it was important to do. I will note that Kelly Love with the Maryland Department of Agriculture (MDA) does not agree that this spreadsheet is a completely true account of what is happening in schools today. There is acknowledgement that there are areas for needed improvement. The challenge that the Workgroup had is that we can only go on what has been submitted through the over 500 pages of MDA IPM in Schools Report.

Moving forward, there are some suggested ways that the CEHPAC may decide to respond.

- A correspondence to the MD legislature with our review of the MDA JCR IPM in Schools Report requesting support in the full implementation of the 1997 School IPM Law (ie. budget, increased capacity needs for MDA, etc.)
- The IAQ & Schools Workgroup can continue to navigate through primary action needs with specific recommendations to the CEHPAC for further decisions on the best approach forward. Examples of needed actions that have come up through the Workgroup activities (including initial discussions with IPM School Coordinators) include:
 - Education of parents and school systems on the importance of the School IPM Law and need to support the School IPM Coordinators in their work to implement practices.
 - Assisting MDA with updating the related content on their website.
 - Ensuring that school IPM plans that are indicated as "Plan TBD" in the MDA IPM in Schools report are actually followed up with to confirm that the plan was indeed established, with a current copy of that plan available.
 - Considering ways to enhance school construction policies so that wood framing is not kept in a completed new structure. (This has been a problem with termites).
 - Encouraging all School Boards to make all IPM School Plans easily available to the public.

IAQ and SCHOOLS WORKGROUP STATUS REPORT for
Children's Environmental Health and Protection Advisory Council [CEHPAC] February 21, 2023 MEETING

Summary of Findings

Review of Public "Reports Required by JCR Report 2022_p87_Integrated Pest Management in Schools" related to **MDA Regulation 15.05.02**

SCHOOL DISTRICT	REQUIRES MDA APPROVAL			# pages JCR DOC	REQUIRED COMPONENTS OF A MARYLAND SCHOOL IPM PLAN											15.05.02.04 ANNUAL NOTIFICATION	15.05.02 SCHOOL GROUNDS
	15.05.02.03(B)(1) BOARD of ED POLICY [BOE Policy #]	15.05.02.03(A)(1)(a) BOARD of ED IPM SYSTEM [BOE Regulation#]	15.05.02.03(A)(1)(b) BOARD of ED IPM PLAN [submitted to MDA]		15.05.02.03(B)(2) ROLES & RESPONSIBILITIES	15.05.02.03(B)(3) PEST CONTROL PROCEDURES	15.05.02.03(B)(4) INSP & MONT PROCEDURES	15.05.02.03(B)(5) STANDARDS (ACTION)	15.05.02.03(B)(6) APPLICATION RECORDS	15.05.02.03(B)(7) PEST MGMT STRATEGIES (IPM)	15.05.02.03(B)(8) EDUCATION & TRAINING	15.05.02.03(A)(9) ANNUAL EVALUATION	15.05.02.03(B)(10) APPLICATION NOTIFICATION				
Allegany	EBAD	EBAD-R1	2008 April 9	12	p 3 contacts?	pp 3,9 *Plan TBD*	pp 4-5	p 5	p 6	p 6	p 7	p 7	p 7				
Anne Arundel			2015 December 1	45	pp 7-8 contacts?	pp 8-9	pp 9	pp 9-13	p 13	p 9	p 13 how?	p 16	p 14	p 13 universal	pp 17-36		
Baltimore City			2011 September	4	p 1 contacts?	pp 2-3	pp 2-3		p 3		p 4	p 4	p 4 universal?				
Baltimore County			2009 March 19	5	pp 1-2 contacts?	pp 2-3		pp 2-3	p 4	pp 2-3		p 4	p 4 oral?				
Calvert			2014 November 17	4	p 1 contacts?	pp 1-3*Plan TBD*			p 3	pp 1-4	p 4	p 4	p 4				
Caroline	V.50.40 Policy	V.50.40 Regs	2002 April 18	7	p 1 contacts?	p 2 *Plan TBD*	p 3 -routine apps		p 3	pp 2-4	p 4	p 6	p 4 oral?				
Carroll	EBAA	EBAA Regs	missing date	7	p 1 contacts?	pp 4-5			pp 2-4		pp 3-4	p 2,7 contractor?	p 5				
Cecil	ECBA	ECBA-RA	2011 March 9	7	pp 1-2 contacts?	p 2	pp 2-3	p 3	p 5 access?	p 3-5 weeds?	p 2 teachers?	p 2, 5	p 3 written?		p 5 Plan?		
Charles			2002 May 13	5	p 1 contacts?	p 2 *Plan TBD*			p 3			p 4	p 4				
Dorchester			2014 April 30	6	p 1 contacts?	p 2	p 2	p 3	p 4			p 4	p 5 annual?				
Frederick		#200-03	2002 April 25	94	pp 3-4 contacts?	p 4-5 applicators?							pp 6-7 posting?				
Garrett			1999 September 23	20	p 5 roles?	pp 3-4	p 7	p 7	p 4 access?	p 8-12	p 4 how?	p 13 1999 Plan?	p 4 register?		pp 11-12		
Harford			2014 March 10	19	p 2 contacts?	pp 3-4	p 7-8	p 7	pp 9&16	pp 10-15	p 1 pest. use?	p 17	p 13 handwritten	p 25 contact?			
Howard			2002 February 21	34	p 1-2 contacts?	pp 21-23		p 8 decisions?	p 6 PL?	pp 7-9	p 6 how?		pp 2-5 Info Fee?		p 10-20		
Kent			2002 April 19	9	p 1 contacts?	p 2	p 3-4 contractor?	p 4 mgmt goals?	p 4 access?		p 5 how?	p 5	p 6	p 6 annual?	p 1 Plan?		
Montgomery		ECF-RB	2017 November 30	4	p 1 contacts?	p 2 *Plan TBD*	p 2-3		p 3 access?		p 4 how?	p 4	p 4 annual?		Agri Prog IPM		
Prince George's			2021 August 26	19		p 7 aerosols?	p 6 Memo?	p 12 aerosols?	p 16 sample log	p 10, 11, 14 & 15			pp 1&7 register?	p 1 2021-2022			
Queen Anne's			2018 March 15	6	p 1 contacts?	p 1 *Plan TBD*	p 2		p 2-3 access?		p 3 how?	p 3	p 3 universal?		p 4 Plan?		
St. Mary's			2014 December 17	5	p 1 contacts?	p 2 *Plan TBD*	p 2-3		p 3 access?		p 4 how?	p 4	p 5 annual?				
Somerset			2021 August	37	p 9 contacts?	p 10	pp 11-13		p 34 FORM	pp 14-15	p 19	pp 19-20	pp 21-23	p 24-27	pp 16-18		
Talbot	#5.13	#5.13 Regs	2002 February 4	7	p 1 contacts?	p 2 *Plan TBD*	p 2-3		p 3 access?	p 3 contractors?		p 4	p 4 annual?				
Washington			2002 March 18	26	p 5-6 contacts?	pp 1-4	p 7	p 7 thresholds?	p 2&4 access?	pp 8-9	p 2 how?	pp 11-12 annual?	p 3 staff?	p 2	pp 10-11		
Wicomico	ADM-FAC-PL-001		2016 February	31	p 8 contacts?	p 9	pp 10-11		p 12	pp 13-17	p 17-18	p 18	pp 19-23	p 24-27	pp 16-18		
Worcester			2009 August 26	22	p 1 contacts?	pp 2-3	pp 3-4 how?	p 4 thresholds?	p 4	pp 4-5	p 6 how?	pp 3&6	pp 6, 7 & 13	p 7 universal?	p 5 Plan?		
TOTALS	IPM Policies = 6	IPM Regs = 7	Submitted = 24	442		Plan TBD = 8									Plans? = 18		
MDA JCR IPM REPORT 12/1/22	25%	29%	100%			33%									75%		

KEY: BLANK = Missing Required Component **HIGHLIGHTED/SHADED** = Incomplete Required Component "Plan TBD" = Specifies IPM Plan To Be Developed "Plans?" = missing Grounds IPM Plan

SOURCE DOCUMENTS Public access County Board of Education[BOE] and County Department of Education[DOE] Websites and public documents provided by Maryland Department of Agriculture [MDA] noted here as EXHIBITS:

EXHIBIT A - MDA IPM Document 2022 - IPM Violations as of 220304 PUBLIC Document from MDA to Maryland General Assembly [MGA]

EXHIBIT B - MDA JCR REPORT 2022 – Links to Plan by County – MDA JCR "IPM in Schools Report" embedded ¹

EXHIBIT C - MDA JCR REPORT 2022 - LINK to MD Public School IPM Contacts 11.2022 230112 – embedded ²

EXHIBIT D - MDA JCR "IPM in Schools Report" to Maryland General Assembly December 1, 2022³ Pursuant to 2022 Joint Chairmen's report, p. 87-88.

¹ [https://dlslibrary.state.md.us/publications/JCR/2022/2022_87-88\(IPM\)/2022_87-88\(links\).pdf](https://dlslibrary.state.md.us/publications/JCR/2022/2022_87-88(IPM)/2022_87-88(links).pdf)

² <https://mda.maryland.gov/plants-pests/SiteAssets/Pages/Integrated-Pest-Management-%28IPM%29-in-Schools/MD%20Public%20School%20IPM%20Contacts%2011.2022.pdf>

³ [https://mlsd.ent.sirsi.net/client/en_US/JCR/search/detailnonmodal/ent:\\$002f\\$002fSD_ILS\\$002f\\$002fSD_ILS:55029/one](https://mlsd.ent.sirsi.net/client/en_US/JCR/search/detailnonmodal/ent:$002f$002fSD_ILS$002f$002fSD_ILS:55029/one) with all submitted plans at [https://dlslibrary.state.md.us/publications/JCR/2022/2022_87-88\(IPM\).zip](https://dlslibrary.state.md.us/publications/JCR/2022/2022_87-88(IPM).zip)