



Strategic Plan for School Integrated Pest Management

Federal Fiscal Years 2016-2017

**Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention**

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Statement of Concern

Protecting children’s health is a top priority for the U.S. Environmental Protection Agency. More than 53 million children and 6 million adults in this country spend a significant portion of their days in more than 120,000 public and private schools. These children face risks arising from the unnecessary exposure to pests and pesticides. They may contract diseases vectored by biting insects, suffer asthma attacks caused by allergens or triggers from cockroach and rodent infestations, and be exposed to unnecessary pesticide applications in schools. Only a relatively modest percentage of U.S. K-12 schools are currently using a smart, sensible, and sustainable approach to managing pests called Integrated Pest Management, or IPM, that can significantly reduce these risks. EPA aims to help schools across the nation implement sustainable pest management practices to create a healthier environment for our children and teachers.

Vision and Mission

EPA’s vision is that all of the nation’s students attend schools with verifiable and ongoing IPM programs. Our mission is to build partnerships and collaborations to promote and support school IPM, demonstrate its value, and provide information on the tools available to schools interested in establishing new or improving existing IPM programs.

Verifiable school IPM is an ongoing activity that includes these documentable elements:

- Understanding your pests
- Setting action thresholds for key pests
- Monitoring for pests, their locations and populations
- Removing conditions that allow pest infestation
- Using pest control tactics including sanitation, structural maintenance, and nonchemical methods in combination with pesticides

Objectives

The objectives of the Agency relative to school IPM are to:

- Increase demand for School IPM
- Supply what schools need to succeed
- Reward Success
- Grow and effectively leverage the stakeholder network
- Align School IPM with other EPA school programs
- Strengthen relationships with federal partners

Background

EPA’s mission is to protect human health and safeguard the environment. In 2010, the various EPA Offices made specific commitments to the Agency's Administrator in support of children's health protection. Out of these commitments, the Office of Chemical Safety and Pollution Prevention (OCSPP) launched an initiative to achieve greater adoption of Integrated Pest Management (IPM) in schools as part of its obligation to protect children’s health.

IPM is a sustainable approach to managing pests that combines biological, cultural, mechanical, physical and chemical tools in a way that minimizes economic, health and environmental risks. IPM creates a safer and healthier learning environment by effectively managing pests and reducing the unnecessary exposure of

students, teachers, and staff to pesticides. An effective IPM program uses common sense, prevention-based strategies to reduce sources of food, water, and shelter for pests in school buildings and grounds.

While IPM is a smart, sensible, and sustainable approach to managing pests, it is estimated that a relatively modest percentage of U.S. K-12 schools currently have verifiable IPM programs. Federal law, US Code at Title 5 Section 136r-1, provides the Agency with a mandate to "...support the adoption of IPM". EPA's vision and recommendation is for all students to attend schools with verifiable, ongoing IPM programs.

In support of its mission, the federal mandate on IPM, and its vision for school IPM, OCSPP committed to working with partners both inside and outside of the Agency, including EPA's Headquarters and Regional Offices, other federal agencies, states, tribes, universities, pest management industry, and non-governmental organizations to significantly increase the implementation of IPM in schools.

EPA Assistant Administrator Jim Jones has noted that *"many schools are stuck on a treadmill of never-ending pesticide applications, without addressing the underlying issues that make schools attractive to pests. If we can make it so pests aren't attracted in the first place, the need for pesticides in schools would be greatly reduced."*

EPA Invests in School IPM

Since 1996, EPA has invested \$3.6 million in extramural resources to support over 50 demonstration, outreach, and educational projects on school IPM. This investment has yielded many successes, beginning with the Monroe Model for school IPM and expanding to school IPM coalitions throughout the country involving many stakeholders including university extension, pest management professionals, health departments and other IPM supporters.

In the mid-1990's, the Monroe County Community School Corporation (MCCSC) developed an IPM program with the support of Indiana University. The multi-step program was piloted at three elementary schools and relied on communication, partnership, and sound pest management. It aimed to effectively control pests, reduce pesticides used in schools, educate staff and students about pests in their schools, and demonstrate the IPM concept.

The success of their pilot program led MCCSC - using two EPA grants - to expand the program district-wide. With the IPM program, known as the *Monroe Model*, in place, MCCSC saw a 90 percent reduction in pesticide use, pest problems, and pest control costs. Money saved from reduced pesticide use enabled MCCSC to hire a district-wide pest management coordinator. MCCSC's work became a model for many schools seeking to adopt IPM programs and has positively impacted over 1 million children nationwide as it has been more broadly adopted.

MCCSC's work has become a model not only for Indiana school districts, but for the nation's many schools seeking to adopt IPM programs.

Through an EPA grant in 2008, the IPM Institute of North America led an effort to initiate and reinvigorate school IPM coalitions throughout the nation. The project increased coordination and engagement of school professionals to incorporate IPM in their professional roles and organizations. In conjunction with this effort, four regional school IPM working groups were established to lead demonstrations in new states and create self-expanding coalitions in more experienced states. Each of these working groups initiated a coalition within some of their states. These coalitions included diverse stakeholders, such as university extension, state agencies, and pest management professionals. The project reported many successes and impacted some 3 million students and staff through sound IPM programs.

In late 2011, the Agency made a significant shift in internal resources to provide greater protection for children's health by employing IPM as a pollution prevention tool. OCSPP staffing resources in the Regions were redirected to school IPM and there was a commitment to create a Center of Expertise for School IPM. This shift was a reflection of OCSPP's increased attention to, and support of school IPM efforts. This redirection took shape in 2012 and into 2013 as staffing the Center of Expertise for School IPM took place and engagement with the Regional School IPM Coordinators took shape.

In 2012, the Agency provided over \$1 million in funding to support school IPM coalition-building efforts in several states, including Colorado, Illinois, Indiana, Oregon, Utah, and Washington. This funding also advanced efforts to increase IPM adoption within more limited geographic areas and through mechanisms other than coalition-building in Florida, Louisiana, and Wisconsin. To date, these coalitions have realized varying levels of success and sustainability but all have advanced IPM implementation in their states' schools.

In 2014, the Agency shifted the focus of the majority of its external investments to support projects with broad, national implications. This shift better aligned the resource investments with the program's focus on wholesale infusion of IPM into schools across the nation. Through two grants, totaling \$0.5 million, the Agency is supporting the development of a central, Internet-based hub for materials that will give school districts ready access to the information they need to start or refine their IPM program. In addition, a training and certification program is being developed for school staff to include everyone from custodians to kitchen staff to the school administrators.

EPA's School IPM Program

The 2011 launch of the Agency's initiative to promote the expanded use of IPM in schools and increase the number of schools with verifiable IPM programs saw a focus on accelerating the move from demonstration to implementation in EPA's efforts. The ultimate goal is to ensure that the millions of students in our nation's schools benefit from the protection afforded by the adoption of smart, sensible, and sustainable pest control practices as part of IPM programs. The Agency recognizes that its strategic goal cannot be met by acting alone. EPA must also utilize its resources to assist and enable strategic partners to promote increased adoption of school IPM.

Going forward, EPA is interested in sustaining and increasing the national results for school IPM. In keeping with ongoing efforts, EPA is launching a renewed outreach effort to promote national partnerships for school IPM. The broad goal of this outreach effort is to institutionalize IPM in schools, nationally.

EPA is working to create the circumstances where the adoption of IPM by schools is more likely – enrolling advocates and allies to help spread the word and develop tools; compiling existing tools for easy access; filling gaps where tools or information do not exist; assessing the human health benefits provided by IPM implementation; creating the business case for school IPM adoption, whereby school districts can easily evaluate the fiscal considerations of program implementation; and encouraging schools to adopt IPM. In addition the Agency will recognize those school districts that demonstrate a commitment to IPM.

The ability to evaluate and accurately determine the level of adoption and robustness of a school IPM program is important in assessing the program's impact. Defining IPM and its verifiable elements creates a basis upon which any school can be evaluated. The Agency recognizes that IPM is practiced along a continuum and that positive results are attributable through other similarly positive changes in behavior.

Organizational Involvement

Biopesticides and Pollution Prevention Division / Environmental Stewardship Branch

The Biopesticides and Pollution Prevention Division's (BPPD) Environmental Stewardship Branch provides leadership and oversight of the Agency's school IPM efforts.

Structure

The Environmental Stewardship Branch Chief reports to the BPPD Director who, in turn, reports to the Director of the Office of Pesticide Programs. The branch is currently comprised of eight staff, five of whom comprise the Center of Expertise for School IPM.

Roles and Responsibilities

- Set program direction and policies
- Provide program leadership and guidance
- Oversee the Center of Expertise for School IPM
- Administer national competitions and assistance agreements

Center of Expertise for School IPM

The Center of Expertise for School IPM provides leadership and expertise to effectuate the goal of ensuring that millions of students in our nation's schools benefit from IPM practices and verifiable IPM programs.

Structure

The Center is organizationally part of the Office of Pesticide Programs, Biopesticides and Pollution Prevention Division, Environmental Stewardship Branch but is physically located in the EPA Region 6 office in Dallas, Texas. The Center is comprised of one senior position, designated the Center Lead, and four staff positions. EPA Headquarters (BPPD) provides leadership and oversight.

Roles and Responsibilities

The Center of Expertise will focus on a wide range of school IPM activities including:

- Contributing to the development and refinement of national program direction
- Providing input and assistance to the Regions on regional strategies and projects to help achieve national goals
- Providing technical support to the Regions and the school community
- Developing/maintaining web-based resources in conjunction with EPA grantees
- Providing IPM information for the school community through webinars, blogs, articles, listerv, and other outreach vehicles
- Hosting a toll-free line (844-EPA-SIPM) and email box (school.ipm@epa.gov) for receiving inquiries from the school community and public
- Managing publications and outreach materials while relying on existing materials, to the extent possible, and identifying and filling gaps as necessary
- Coordinating with other EPA national programs including: SHIELDS, Clean, Green and Healthy Schools; and Environmental Justice

Regional School IPM Coordinators

School IPM Coordinators in each EPA Region play a key role in encouraging schools to adopt IPM practices and verifiable, and sustainable IPM programs. The Regional Coordinators are well positioned to provide a visible and approachable field presence to schools within their Regions. They draw on existing relationships with school IPM advocates, states, and tribes in their Region. Coordinators in each Region also allow school IPM activities to be tailored to address regional concerns yet focused on the national goal for implementation.

Structure

Each EPA Regional Office is provided one full-time equivalent (FTE) by the Office of Chemical Safety and Pollution Prevention to support their school IPM efforts. These Regional School IPM Coordinators report directly to their respective Regional managers who, in turn, work collaboratively with OPP on school IPM through the Biopesticides and Pollution Prevention Division. Some Regions supplement their school IPM activities using personnel from the EPA Senior Environmental Employment (SEE) Program.

Roles and Responsibilities

The Regional Coordinators maintain close communication and coordination with each other and Headquarters. This allows ideas, outreach materials, and coordination opportunities to be shared. Regularly scheduled conference calls facilitate communication and continuity. The Regions also provide input on national assistance agreement selections by participating on review committees.

The Regions will focus on school IPM activities including:

- Increasing the demand for school IPM programs by drawing upon and expanding the influence of key stakeholders including state departments of education, health, and environment/agriculture. Regional experience has shown collaborations with these organizations can provide opportunities for the expansion of school IPM in states that do not have legislative mandates to drive adoption
- Creating partnerships with stakeholders including the state associations of school facility/plant managers, school nurses, environmental health professionals, school business officials, and school administrators
- Seeking opportunities to engage state PTAs, state structural pest control boards, and the local Service Employees International Unions
- Conducting outreach activities, training sessions, coalition events, and school IPM assessments
- Providing school districts with information resources and references including model documents and templates for IPM policy development, pest inspections, record keeping, pest logs, etc.
- Participating in internal and external school IPM meetings/calls
- Responding to technical assistance calls/requests
- Coordinating outreach opportunities at the Regional level with other EPA school programs for delivery to school districts including a range of human health issues in schools and the business case for addressing these issues
- Efficiently engaging the largest school districts within their states with an emphasis on those in close physical proximity to the Regional Offices
- Contributing to the development of an annual Regional school IPM workplan
- Reporting monthly on school IPM activities, outputs, and outcomes to the Center of Expertise

Strategic Approach

EPA will lead national school IPM efforts, in collaboration with other EPA school-related programs, federal agencies, states, universities, and non-governmental organizations. EPA's efforts will be led by the Biopesticides and Pollution Prevention Division's Environmental Stewardship Branch in the Office of Pesticide Programs. To reach our desired state of widespread adoption of IPM in schools we have to: (1) increase the demand for IPM in schools, (2) supply what schools need to implement and sustain an IPM program, and (3) recognize and reward success.

To achieve greater adoption of IPM practices and verifiable school IPM programs, EPA will establish and strengthen partnerships both inside and outside of the Agency. This includes partnerships with other EPA Offices and school programs -- Children's Health Protection, Air and Radiation (SHIELDS and Center for Asthma), Pollution Prevention and Toxics (lead, asbestos and PCBs), Regional Offices -- other federal agencies, state agencies, local governmental entities, tribes, universities, industry, and NGOs dedicated to IPM adoption. Alignment and coordination within the Agency will be critical to the success of this effort. School IPM activities will be integrated with the Office of Children's Health Protection (OCHP) Clean, Green and Healthy Schools efforts, State School Environmental Health Program Guidelines, Tools for Schools, and the Model Healthy School Guidance.

Given the challenges school systems face in adopting IPM, including budgetary considerations, EPA will work on several fronts to help meet the needs of schools nationally. EPA will compile existing information and tools into a single, accessible location for school officials looking to adopt an IPM program. Current and previous grant outcomes will serve as demonstrations to lead other school districts to implement IPM. We will also draw upon existing partnerships through the Pesticide Environmental Stewardship Program and the stakeholder-led school IPM working groups while developing partnerships with new entities in the school arena and pest management industry.

EPA will maximize a wholesale approach toward school IPM implementation by enrolling larger influential school organizations, states, universities, and non-governmental organizations to advocate for school IPM and help school systems with adoption. EPA will minimize retail approach efforts that involve working directly with individual schools, stakeholders to provide small-scale training, assessments, etc. However, a small number of pilot school districts may be used to build successes and demonstrate approaches and the value of school IPM to those schools.

EPA is broadening its list of stakeholders considered to be key influencers in the school community by identifying national and federal organizations involved with the business and administration of schools, children's health, and pest management, whose mission reflect improving education by protecting children's health and ensuring safe and healthy school environments. Formalizing stakeholders into a working network will help increase and sustain national results. Working together, EPA and the network of stakeholders can recruit and enroll new schools and large influencing organizations to join the network so that increased adoption of school IPM will be realized.

Strategies

Strategies for each of the six school IPM objectives are presented below. EPA will place an emphasis on wholesale strategies that create demand for school IPM programs, provide the information and tools schools need to start and grow their IPM programs, leverage resources, and expand our school IPM allies. In the wholesale approach, EPA will enroll larger organizations, states, universities, and non-governmental organizations to advocate for school IPM and help school systems with IPM adoption. EPA will minimize retail approach efforts that involve working directly with individual schools and stakeholders to provide small-scale

training, assessments, etc. Because school IPM is a collaborative effort, partnering and coordination with other entities results in the biggest gains when it comes to getting schools to adopt IPM practices and verifiable, sustainable IPM programs.

Strategies included in this plan are intended to allow the Regions flexibility within the national framework as they develop their Regional workplans. EPA recognizes that school IPM is at different levels of execution in each state and tribe. Regions will need to combine their knowledge of individual state progress with the flexibility this plan provides to design activities that will most effectively further the program objectives. Some states currently have little to no school IPM activities occurring. Other states have many ongoing activities or have already adopted school IPM guidance and/or legislation with varying levels of supportive infrastructure. Some states have a strong stakeholder base and recognized change agents while others do not. These varying situations require EPA's approach to implementation to remain flexible enough to meet the needs of the states.

Note: Parenthesis below indicate the organizational unit(s) primarily responsible for this activity.

(HQ = Headquarters; CoE = Center of Expertise for School IPM; Region = Regional Office; Grantee = Assistance Agreement Recipient)

Objective 1: Increase Demand for School IPM

Primary Strategies

- Convene a school IPM roundtable that will bring together entities with strong credentials to lend their support for school IPM. (HQ)
 - This will include representatives from the public health community.
 - Joining them will be national organizations with influence within the school community (administrators, business officials, facility managers, nurses, teachers, and parents) to pledge their support for the IPM approach and to spread that message throughout their membership.
 - Also participating will be select experts in school IPM implementation to provide a hands-on perspective of the difference IPM can make in a school district.
- Work in partnership with national organizations to build the case for school administrators and business officials that IPM can benefit them by:
 - Providing a healthier school environment where there are fewer pests to vector human diseases, less unnecessary pesticide use, and generally improved indoor air quality;
 - Fewer student absences due to asthma triggered by pests like cockroaches and rodents; and
 - Increasing school revenue with fewer student absences. (HQ, CoE)
- Motivate teachers, school staff, and parents to demand IPM-based pest management. (HQ, CoE)

Supplemental Strategies

- Work with state chapters of the school IPM roundtable to facilitate the flow of IPM information from the national level through the state chapters to the local membership. (Regions)

Objective 2: Supply What Schools Need to Succeed

Primary Strategies

- Provide a virtual *IPM Backpack for Schools* filled how-to information for schools including publications such as the *Business Case for School IPM* and *Model Pesticide Safety and IPM Guidance Policy for School Districts*, monthly webinars, and model school IPM contract guidance. (CoE)
- Provide, in early 2016, a compelling case on the human health benefits of IPM implementation in schools. (HQ, CoE)
- Support an assessment of the economics of school IPM that will provide schools with accurate information on the costs and benefits associated with implementing an IPM program. (HQ, CoE)

- Cooperate with the University of Arizona, an EPA grantee, to complete and make available IPM training for all segments of the school community (*Univ. of Arizona, CoE, HQ*)
- Cooperate with Texas A&M AgriLife, an EPA grantee, to provide easily accessible online information repository. (*CoE, HQ, Grantee*)
- Update the EPA IPM website to provide resources that describe the business and human health cases supportive of school IPM. Information should be in multiple formats and available to the public, teachers, institutions, etc. (*CoE*)
- Provide marketing materials compiled and developed by the Center of Expertise explaining the business and human health cases for school IPM. (*CoE, HQ, Regions*)
- Coordinate the delivery of the business and human health case for school IPM with other EPA school programs to leverage their resources. (*CoE, HQ, Regions*)
- Maintain a list of experts who may provide direct technical assistance to schools developing and implementing IPM programs. (*CoE, Regions*)
- Continue and refine development of online school IPM resources and tools for easy, no-cost access by school officials. This would include sample documents on verifiable IPM, best practices for working with pest management professionals, pest presses, etc. (*CoE, Grantee*)
- Advertise the availability of information, tools, and webinars through listservs, emails, mailings, web postings, conferences, and trainings. (*HQ, CoE*)
- Serve an advisory role on the stakeholder-led National School IPM Working Group. (*HQ, CoE*)
- Participate in stakeholder-led Regional IPM Working Groups: (*Regions, CoE*)
 - Region 1, 2, and 3 plus the CoE* will serve on the Northeast School IPM Working Group
 - Regions 4 and 6 plus the CoE* will serve on the Southern School IPM Working Group
 - Regions 5, 7, and 8 plus the CoE* will serve on the North Central School IPM Working Group
 - Regions 6, 8, 9 and 10 plus the CoE* will serve on the Western School IPM Working Group

**CoE participation will be to keep the Center abreast of Regional issues and developments*
- Participate in national and regional stakeholder meetings with an emphasis on opportunities requiring little or no travel. (*Regions, CoE*)
- Develop coalitions with state and tribal health departments, state school nurses associations, state PTAs, universities, and state children's health and school organizations. (*Regions*)
- Manage and provide cooperative input into school IPM assistance agreements. (*HQ, CoE*)

Supplemental Strategies

- Work with stakeholder community on efforts to assess the adoption of verifiable IPM practices in K-12 public and Tribal schools. (*CoE, Regions*)
- Administer national competitions for school IPM assistance agreements, as funding permits. (*HQ*)
- Participate in coalition demonstration projects funded through the stakeholder-led Working Groups. (*Regions*)
- Participate in face-to-face National stakeholder-led working group meetings, coalition trainings, and meetings affiliated with the National stakeholder-led school IPM Working Group. (*CoE*)
- Compile and distribute to partners and school districts a compendium of past EPA grants that demonstrate successful and verifiable school IPM programs. (*CoE*)
- Develop support packets and fact sheets on pilot projects to disseminate by mail to rural school districts with limited resources and travel. (*CoE, Regions*)
- Provide training and technical assistance to school districts primarily through coalition events or other wholesale mechanisms (in consideration of travel funds). (*Regions*)
- Initiate and participate in outreach opportunities with school district staff, school boards, PTA organizations, parents, and students to increase awareness among the school community. (*Regions*)
- Assist school districts with site implementation, evaluation, and reporting within the Agency's overall wholesale approach. (*Regions*)

- Coordinate, fund, and manage regional school IPM grants based on the availability of funding at the Region level. *(Regions)*
- Participate in assistance agreement review panels, as needed. *(HQ, CoE, Regions)*

Objective 3: Reward Success

Primary Strategies

- Complete development of and launch a school IPM incentive programs to recognize and encourage school districts to continue with and expand their IPM programs. *(HQ, CoE, Regions)*
- Obtain appropriate clearances through the Information Collection Request process with the Office of Management and Budget necessary to gather information from the incentive program applicants. *(HQ, CoE)*
- Finalize and implement a communications strategy for the awards program. *(HQ, CoE)*
- Seek opportunities to provide a public forum for award recipients if budgetary considerations preclude an independent school IPM awards ceremony. *(HQ, Regions)*

Supplemental Strategies

- Share with the Regions information on the school districts seeking and obtaining recognition for their IPM programs. *(HQ, CoE)*

Objective 4: Grow and Effectively Leverage the Stakeholder Network

Primary Strategies

- Continue to refine a list of, and initiate contact with states, universities, and NGOs with whom EPA can collaborate with on school IPM efforts. *(HQ and CoE with Regional input)*
- Maintain a national database of key school IPM contacts. *(CoE with Regional input)*
- Establish partnerships with national and state school-related organizations, such as those representing facility managers, nurses, administrators, teachers, and PTAs/PTOs to ensure a wholesale approach to selling school IPM. *(HQ and CoE for national organizations; Regions for regional and state organizations)*
- Support regional meetings with state and local officials as well as other stakeholders to create and encourage collaboration and supportive networks for healthy schools within the Regions. *(Regions)*
- Create a set of outreach messages on the business case to help further engage the business sector, change agents, and stakeholders. This will draw on published literature and from the results of Agency-sponsored assistance agreement. Finalize a brochure that would appeal to school officials. *(CoE)*

Supplemental Strategies

- Create a platform or mechanism to gather feedback, case studies, and real life scenarios on school IPM implementation. *(CoE)*
- Develop a list of and initiate contact with state and local entities that serve schools. *(Regions)*
- Participate in conferences located near their Regional Office cities, webinars, and exhibits at strategically important outreach events. *(Regions, CoE)*
- Support and strengthen existing state and tribal programs. *(Regions)*
- Foster regional events and information sharing that convenes stakeholders and are tailored to address regional needs. *(Regions)*

Objective 5: Align School IPM with Other EPA School Programs

Primary Strategies

- Collaborate with the Office of Children’s Health Protection (OCHP) and their Clean, Green and Healthy Schools efforts. This will allow EPA to build outreach through OCHP’s leadership, promote school IPM adoption through OCHP’s networks, and create special partnerships. *(CoE, HQ)*
 - OPP will continue to participate on the OCHP workgroup for Clean, Green and Healthy Schools which includes representation from the various EPA programs with school-related elements such as SHIELDS, SunWise, and Energy Star. *(HQ)*
- Engage, as appropriate, other EPA school-related programs (e.g., SHIELDS, asthma, asbestos, lead, PCBs) for collaboration on IPM efforts. *(CoE, HQ)*

Supplemental Strategies

- Regions will engage and participate in Office of Children’s Health Protection activities and events in their respective states and tribes. *(Regions)*
- Cross-train staff in other EPA school programs to effectively deliver information on school IPM in the course of their contact with school-related organizations. *(CoE, Regions)*
- Alignment with OCHP and other EPA Healthy School Programs will continue to evolve. With additional funds from both the Regions and Headquarters, joint conferences could be sponsored and educational brochures with One EPA consistent messaging could be developed. *(CoE)*

Objective 6: Strengthen Relationships with Federal Partners

Solid relationships with our federal partners are key to ensuring coordination of efforts, maximizing opportunities to leverage resources, and effectively utilizing the strengths of each organization. Relationships need to be cultivated and strengthened with several relevant federal partners including Centers for Disease Control and Prevention, Department of Agriculture, Indian Health Services, Bureau of Indian Affairs, Department of Defense, Department of Education, Bureau of Indian Education, Department of Health and Human Services, and Department of Housing and Urban Development.

Primary Strategies

- Maintain contact with other federal agencies and explore collaborative opportunities on school IPM efforts. *(HQ)*
- Remain open to future opportunities created by the Green Ribbon Schools Program to develop a stronger relationship with the Department of Education as we work together for healthier schools. *(HQ)*
- Participate in meetings of the Federal IPM Coordinating Committee as a means of garnering and leveraging support for school IPM efforts. *(HQ)*

Supplemental Strategies

- Participate in meetings of the Regional IPM Center-sponsored school IPM Working Groups. *(Regions, CoE)*
- Participate in meetings of the Regional IPM Center steering/advisory committees and grant review panels. *(Regions, CoE)*
- Participate in state or local level school IPM trainings and meetings. *(Regions)*
- Leverage the federal workgroups to make progress on healthy school environments and school IPM. *(CoE, HQ)*

Quality Control

Quality control is a set of prevention-based activities, such as analysis and inspection, to ensure quality in products. The Agency will utilize the following strategies to ensure quality deliverables from our school IPM program.

Primary Strategies

- Capture and report on metrics related to the school IPM webinar series including attendees, organizations represented, participant feedback, etc. *(CoE)*
- In accordance with federal and Agency protocols on the management of assistance agreement, conduct regular reviews of ongoing assistance agreements to ensure compliance with requirements and progress toward stated objectives. *(HQ)*
- Assist the Regions in reporting on monthly and annual bases, their school IPM activities, including interactions with school districts. *(CoE)*
- Maintain a system for tracking requests for CoE assistance received through the Center email box and toll-free line. *(CoE)*
- Create lists of school and school district contacts as well as EPA school IPM webinar participants. *(Regions, CoE)*
- Track subscription metrics for the School IPM Listserv. *(CoE)*
- Summarize, on an annual basis, outputs and outcomes of School IPM efforts at the Regional, Center, and national levels. *(CoE, HQ)*
- Report on activity-based measures (Appendix) for FY2016-2017 that aim to increase the percentage of school districts that adopt IPM practices and verifiable school IPM programs. *(HQ, CoE, Regions)*

Supplemental Strategies

- Include activities related to regional assistance agreements on progress lists. *(Regions)*
- Include activities related to national assistance agreements on progress lists. *(CoE)*

Quality Assurance

Quality assurance is a program for the systematic monitoring and evaluation of the various aspects of a project or service to ensure that quality standards are being met. The Agency will implement the following strategies to ensure quality results are attained from our school IPM program.

Primary Strategies

- In compliance with EPA's Quality System and OPP's Quality Management Plan, develop project objectives, quality measures, and acceptance criteria for products, assess data quality, and appropriately use data. *(HQ, CoE)*
- Identify opportunities to utilize electronic tools (e.g., spreadsheets, GIS, databases, share drives, web-based tools) to improve efficiency. *(HQ, CoE, Regions)*
- Use project management tools to maintain an accurate schedule for projects, track progress and work products, and tracks resource projections and divestitures. *(HQ, CoE)*

Supplemental Strategies

- Ensure EPA Project Officers involved with school IPM assistance agreements are trained and maintain current certification in the proper stewardship of Federal assistance activities, critical roles and responsibilities of the EPA Project Officer, and EPA policies, regulations and Orders related to assistance agreements. *(CoE, HQ)*

- Ensure EPA Contracting Officer's Representatives and Contracting Officer's Task Order Representatives receive training and maintain current certification in accordance with federal and Agency guidelines, including the EPA Acquisition Guide. *(CoE, HQ)*

Appendix – National Program Manager Measures for School IPM Success

The National Program Manager (NPM) Guidances set forth the strategies and actions the EPA and its state and tribal partners will undertake to protect human health and the environment. The NPM Guidances provide the linkage from the FY 2014-2018 EPA Strategic Plan and annual budget by providing implementation direction to EPA regional offices, states and tribes. Taken together, the NPM Guidances serve as a national framework for regional offices to use as they tailor their approaches and strategies for engaging with states and tribes. Beginning with FY 2016-2017, the EPA will implement a new two-year cycle for the NPM Guidance process, which was developed collaboratively with our state and tribal partners.

School IPM has been identified as one of five OCSPP National OPP Areas of Focus for Regional Offices in FY2016-2017. The goal of this activity is to decrease exposure of children in public and tribal schools (grades K-12) to pests, pesticides, and diseases vectored by pests through increased adoption of verifiable and sustainable IPM programs. Activities to support school IPM support Goal 4 of the Agency's Strategic Plan by protecting human health from pesticide risk. This activity also supports the agency's children's health and environmental justice goals.

FY2016-2017 Regional ACS Measure

Number of activities conducted, consistent with the EPA's "Strategic and Implementation Plan for School Integrated Pest Management," to provide outreach, education, and/or assistance to public and tribal schools at the kindergarten through high school levels to adopt verifiable and sustainable IPM practices.

- This measure is a non-commitment measure for FY 2016-2017 to allow regions the flexibility to direct their efforts where they are most needed, and to select the activities and level of effort appropriate for the needs of their region.
- Regional offices must provide a brief description and the number of each type of activity that were conducted in their region in the comment field during mid- and end-of-year ACS reporting. Activities are defined as substantial increments of work with one or more internal or external stakeholder(s) or development of program capacity such as databases or educational resources to advance IPM in schools. In order to keep a wide range of activities somewhat comparable, each reported activity should generally include: 1) preparation, 2) substantive participation, and 3) follow-up actions, as needed.