

**Pest Management Policy**

Reference Number

5-168-100

Cabinet Officer/Board Approval

Effective Date

Page

1 of 6

Contact Officer – Chief Financial Officer/Vice President for Business &amp; Finance

**1. Overview**

The purpose of this policy shall be to institute methodologies regarding pest management which are designed to economically manage the impact of structural, greenhouse, landscape and nuisance pests on people, property and the environment.

**2. Application**

This policy applies to all Tusculum College students, staff, faculty, vendors, contractors and guests.

**3. Definitions**

3.1 Pests - For the purpose of this policy, a “pest” includes any insect, rodent, nematode, snail, weed, fungus or other form of plant or animal life that adversely interferes with the health, safety, aesthetic, environmental or economic goals of the college. A pest does not include viruses or microorganisms on or in a living person or animal, but shall include plant diseases.

3.2 Pesticides - The term “pesticide” includes any chemical agent or mixture of agents registered as a pesticide by the Tennessee State Department of Agriculture, which includes herbicides, insecticides, rodenticides, fungicides, or other chemicals that kills, changes the regular growth rate of, repels, or otherwise reduces levels of a targeted pest or pests. It shall not include germicides, disinfectants, bactericides, sanitizing agents, water purifiers and swimming pool chemicals used in normal cleaning activities.

3.3 Integrated Pest Management - “Integrated pest management” (IPM) means a coordinated decision-making and action process that uses the most appropriate pest control methods and strategy in an environmentally and economically sound manner to meet pest management objectives.

**4. Policy**

Tusculum College shall utilize an integrated pest management (IPM) program which reflects effective and environmentally sensitive approaches to managing the impact of structural, greenhouse, landscape and nuisance pests on people (physically and mentally) and property through reliance upon a combination of common-sense practices. These practices include: 1) the use of current and comprehensive information on the life cycles of pests, 2) the understanding of the interaction of pests with people, structures and the environment, and 3) the facilitation of the most appropriate pest control

**Pest Management Policy**

Reference Number

5-168-100

Cabinet Officer/Board Approval

Effective Date

Page

2 of 6

Contact Officer – Chief Financial Officer/Vice President for Business &amp; Finance

methods for a given situation. The IPM shall utilize a pro-active process focused on the avoidance, monitoring, prevention and suppression of conditions conducive to pest problems. If the foregoing methodologies are not sufficient to properly manage the pest problems, the College shall pursue the judicious implementation of "least hazardous" chemical intervention materials and methods that minimize risk to the public and the environment.

**5. Procedures****5.1 General IPM Strategy**

The Integrated Pest Management process shall consist of multiple steps including: Prevention & Education, Monitoring & Record Keeping, Identification, Initial Responsive Intervention, Primary Responsive Intervention, and Follow-Up Responsive Intervention.

**5.2 Prevention & Education**

Acknowledging that the most effective way to control pest problems is to control the introduction of pests in the environment, the College will focus efforts on pro-active and preventive measures, rather than waiting to apply responsive procedures in a reactive manner.

**5.2.1 Communication/Community Education**

Facilities Management, Residential Life and Campus Safety personnel shall be responsible for communicating with community members regarding introduction of pests into the living environment and the means of controlling the habitat which supports infestation. This may take place through active (e.g. meetings, training seminars, etc.) or passive (e.g. bulletin boards, bulletins, etc.) program efforts, as long as effective communication is achieved.

Community members shall be educated about the potential to introduce pests through various means (e.g. cardboard boxes brought from storage areas harboring roach eggs, luggage brought back from travel harboring bedbugs, etc.) and how to prevent and/or mitigate same. While this task shall fall to all areas to manage, it shall be a primary responsibility of the Residential Life program in working with incoming residential students.

**5.2.2 Removal of Habitat**

Support shall be provided for the disposal of excess clutter (especially at special times of the year such as new faculty and residential student move-in, etc.) to encourage the proper disposal of items lending to infestation.

**Pest Management Policy**

Reference Number

5-168-100

Cabinet Officer/Board Approval

Effective Date

Page

3 of 6

Contact Officer – Chief Financial Officer/Vice President for Business &amp; Finance

80 Maintaining clutter in campus environments shall be considered a violation  
 81 of health and safety standards and should be addressed by the appropriate  
 82 accountability mechanism for the violating party.

### 83 5.3 Monitoring & Record Keeping

84 Facilities Management shall assure various monitoring techniques are  
 85 employed to support detection of developing pest problems and records are  
 86 maintained to support intervention at the earliest reasonable opportunity.

87 5.3.1 Monitoring Stations - Various monitoring techniques shall be employed to  
 88 support detection of developing pest problems (e.g. fly strips, gel bait boxes,  
 89 etc.) and record keeping processes for these monitoring stations shall be  
 90 maintained and reviewed regularly by pest control personnel in support of the  
 91 creation of appropriate interventions for pest control management.

92 5.3.2 On-Site Pest Log – On-site log books identifying date and location of  
 93 sightings should be maintained and reviewed regularly by pest control  
 94 personnel in support of the creation of appropriate interventions for pest  
 95 control management.

96 5.3.3 Master Pest Control Log – A master log shall be maintained in the Facilities  
 97 Management area documenting the:

- 98
- 99 • Date of the complaint,
- 100 • Type of complaint (bites, bug sightings, damage to property),
- 101 • Building and room number,
- 102 • Date of first inspection,
- 103 • Results of inspection,
- 104 • Any pest management activity, dates, etc., and
- 105 • Final inspection, dates, and results.
- 106

### 107 5.4 Identification

108

109 Possible pest subjects should be kept in baggies or other appropriate  
 110 receptacles for examination and identification by trained pest control  
 111 professionals to allow for proper intervention techniques to be employed.

### 113 5.5 Initial Responsive Intervention

114

115 Initial responsive measures shall first and foremost consider the safety of  
 116 persons in a given situation. Initial responsive interventions shall include  
 117 whether individuals shall be displaced pending identification and  
 118 confirmation, etc.

**Pest Management Policy**

Reference Number <b>5-168-100</b>	Cabinet Officer/Board Approval	Effective Date	Page <b>4 of 6</b>
Contact Officer – Chief Financial Officer/Vice President for Business & Finance			

- 119 5.5.1 Initial Intervention Protocol - Varying situations will call for distinctly  
 120 different responses and trained personnel should always be consulted to  
 121 make the determination as to the appropriate initial responsive intervention.  
 122 All on-call personnel shall be notified as to the need for key personnel (Dean  
 123 of Students, CFO/Vice President for Business, Vice President for Enrollment  
 124 Management, or President) to be contacted in such situations (including  
 125 Campus Safety, Student Life and Facilities Management personnel).
- 126 5.5.2 Displacement of Personnel - Whether individuals shall be displaced from the  
 127 location of a potential pest sighting will vary in consideration of: general risk  
 128 factors (e.g. toxicity of brown recluse bite, etc.), personal risk factors (e.g.  
 129 anaphylactic reactive individual, etc.), and community risk factors (e.g.  
 130 potential spread of infestation [bedbugs], etc.).
- 131 5.6 Primary Responsive Intervention
- 132
- 133 5.6.1 Containment – The issue of containment should be examined at the forefront  
 134 of the pest management intervention to assure that no cross-contamination is  
 135 caused through ill-constructed intervention efforts (e.g. moving boxes  
 136 inhabited with insect eggs from one location to another due to pest problem).  
 137
- 138 5.6.2 Dispatch – While potential risk to life safety and/or property damage shall be  
 139 taken into consideration, Facilities Management personnel shall primarily  
 140 respond to pest management issues during standard business hours.  
 141
- 142 5.6.3 Identification – If no confirmation of a pest problem is made at the  
 143 identification stage, then the issue shall be brought to closure with a request  
 144 that those in the area maintain awareness, proceed about their business, and  
 145 report any subsequent sightings or issues. If confirmation of a pest problem is  
 146 made at the identification stage, then various protocols will be engaged  
 147 according to the IPM strategy developed by the pest management team.  
 148
- 149 Only the College's designated pest management control officer, the Director  
 150 of Facilities Management or other personnel specifically designated by the  
 151 Cabinet for a given situation, can confirm or deny the presence of pests on  
 152 College property – NOT campus safety, student health services, student life or  
 153 any outside person/entity.  
 154
- 155 5.6.4 Intervention Protocol – Each pest management situation will require its own  
 156 intervention strategy to allow for an effective IPM. For instance, cleaning for  
 157 bed bugs should focus on sleeping and lounging areas, whereas cockroach  
 158 control depends on sanitation in cooking and eating areas.  
 159  
 160

**Pest Management Policy**

Reference Number

5-168-100

Cabinet Officer/Board Approval

Effective Date

Page

5 of 6

Contact Officer – Chief Financial Officer/Vice President for Business &amp; Finance

- 161 5.6.5 Compliance – All College community members are expected to assist and  
 162 comply with any and all instructions provided by the designated pest  
 163 management control officer. Failure to comply with a College official shall  
 164 be pursued through the appropriate institutional mechanism related to the non-  
 165 compliant party.  
 166
- 167 5.6.6 Notification - Notification protocols shall differ based on the issue and the  
 168 intervention. However, once the distribution/application of pesticides have  
 169 been selected as an intervention methodology, notification shall be attempted  
 170 to those in the immediate affected area.  
 171
- 172 5.6.6.1 Notification in Young Children Areas - In areas where young children are in  
 173 regular care, notification of the use of pesticide shall be sent out to families at  
 174 least one day prior to use of said materials, as possible.  
 175
- 176 5.6.6.2 Notification Exception for Immediate Risk - It is recognized that certain pest  
 177 problems can pose an immediate threat to the health and welfare of  
 178 community members and, therefore, advanced notification is impractical or  
 179 even dangerous. In such cases, the application of pesticides may proceed in  
 180 with appropriate precautions being observed without advanced notification  
 181 protocols being implemented and notification of pesticide application will be  
 182 provided as soon as possible following the application. Please note that, for  
 183 the purposes of this policy, germicides, disinfectants, bactericides, sanitizing  
 184 agents, water purifiers and swimming pool chemicals used in normal cleaning  
 185 activities are not included.  
 186
- 187 5.6.6.3 Notification Exception for Use of Enclosed Passive Pesticide – Notification  
 188 shall not be necessary when "least hazardous" pesticide distribution/  
 189 application methods of tamper-resistant bait stations where persons, especially  
 190 children, do not have access/exposure to the pesticide.
- 191 5.7 Follow-Up Responsive Intervention
- 192 After it has been concluded that the pest management issue has been abated,  
 193 then the issue shall be brought to closure with a request that those in the area  
 194 maintain awareness, proceed about their business, and report any subsequent  
 195 sightings or issues.  
 196
- 197 **6. Forms**
- 198 See 5-168-110-Resource-Bedbug Response Notification-Understanding  
 199 Letter
- 200 See 5-168-120-Resource - Bed Bug FAQ

**Pest Management Policy**

Reference Number <b>5-168-100</b>	Cabinet Officer/Board Approval	Effective Date	Page <b>6 of 6</b>
Contact Officer – Chief Financial Officer/Vice President for Business & Finance			

**Review Timeline & Modification History**

Modification Details

Next Review Date -

Date

Cabinet Officer/Board Approval