Integrated Pest Management (IPM) for MIT Technology Childcare Center (TCC)

1. **Purpose / Background**
   In compliance with the Protection of Children and Families from Harmful Pesticides Act, MIT has developed a plan to protect children at the MIT Technology Childcare Centers (TCC) from pests and also from the substances/practices that may be used to control pests. The purpose and objectives of this plan are to:

   - Protect children from pests and pest control treatments that may be harmful
   - Manage pests in a manner to prevent interference with the children’s learning experience
   - Provide open communication with parents and interested parties about the manner in which MIT protects children from pests and pest treatments.
   - Provide necessary pest control while minimizing pesticide usage
   - Assure that the Education Service Provider staff is educated about pest control, signs of pests, means of reporting presence of pests and knowledge of their reporting obligations.

   The MIT policy is to incorporate Integrated Pest Management procedures for the control of structural and landscape pests in a manner that reduces exposure to pests and harmful pest control products. The use of pesticides is to be minimized and pesticides are to be used only when other pest control practices have proven insufficient.

2. **Scope**
   MIT implements a comprehensive Integrated Pest Management Plan (IPM) throughout the entire campus and there are pest management applications for each and every stage of the Building Life Cycle (Concept, Design, Build, Commission, Use, Demolish / Renovate). The scope of this SOP is limited to the Pest Management Practices at the MIT Technology Childcare Centers on the Cambridge campus. See the MIT Integrated Pest Management Program description for the comprehensive IPM Plan.

3. **Prerequisites**
   3.1 **IPM Committee:**
   3.1.1 The committee shall have representation from at least the following entities:
   - Environment Health and Safety Office
   - Facilities Department
   - Center for Work-Life
   - Education Service Provider (contractor)
   - DSL Housing
   - DSL Campus Activities Center (CAC)

   3.1.2 Tasks of the IPM Committee are to:
   a. Develop an IPM plan that describes the organization and implementation of IPM on TCC grounds.
   b. Periodically evaluate the IPM Program
   c. Educate the MIT community about pest prevention practices
d. Review the need for new or updated policy or procedural changes with respect to IPM program.
e. Assist in development of contract specifications for childcare center contractor
f. Ensure appropriate notifications to parents are made prior to pesticide usage
g. Initiate work orders related to IPM design criteria to Facilities Operations, Facilities Design & Construction, and Housing management

3.2 Communications

3.2.1 The Education Service Provider staff shall submit a Facilities work order when a pest concern is noted. This procedure will result in proper dispatch of vendor services and proper documentation of the request. It will also allow gathering pest management statistics for trend analysis and management reports.

3.2.2 The Pest Control Service contractor shall communicate with the on-site manager of the Education Service Provider and the Operational Unit contact (Facilities or DSL Operations staff) in response to concerns about pests. This will hold true in the Eastgate, Westgate, North Court and Stata Center locations.

3.2.3 The TCC IPM plan and data logs shall be available at each TCC location, preferably at the main desk.

3.2.4 Professional Day Care staff will report via their management protocol to the MIT Human Resources (HR) contact in the Work-Life Center.

3.2.5. All pest incidents shall be reported for recordkeeping in the SAP work order system.

3.2.6 The HR contact in Work-Life and Child Care Initiatives is responsible to assure that the Contract Child Education Service Provider:
   a) Notifies parents at least three days in advance of a pesticide application
   b) Pre-arranges with each parent at the beginning of each school year how that parent wishes to be notified (e-mail, letter in cubby, etc).

3.2.7 The Manager, Custodial Services shall provide the IPM Coordinator with data on pest activity and the IPM Coordinator in turn will reformat the data for reporting to the State of Massachusetts per requirements of the Child Protection Acts of 2000.

3.2.8 The Environment, Health and Safety Office member of the IPM shall communicate the results of the annual audit to the IPM committee, and make such audit available upon request.

3.3 Training and Education

3.3.1 TCC staff shall receive IPM training on an annual basis. At a minimum, this training shall include:
   - How to recognize pest issues
   - When and how to report pest issues
   - Information on the location of the IPM written program
   - Pest prevention practices and strategies (i.e. plant watering, food in containers, etc)
   - Training / educating children about pests (e.g. eating in designated areas, informing teacher about seeing pests, etc)
3.4 Monitoring

3.4.1 The Pest Control services contractor will conduct regular pest inspections and notify the Operational Unit contact (i.e. the Building Manager or the Manager of Custodial Services), depending on the location of the incident, as well as the on-site manager of the Education Service Provider as to the proper course of action. If pests are absent the indoor monitoring will consist of a minimum of quarterly inspections. If pests are present, there will be daily inspections until such time as there is no observation of pest presence for at least three days and when the Operational Unit contact working with the Pest Control services contractor determines the pest issue is resolved.

3.4.2 Audits / Oversight

3.4.3 On an annual basis the Environment, Health and Safety Office shall conduct or arrange for an audit of the TCC IPM Program. See Appendix A for the audit checklist.

4. Responsibilities

4.1 Environment, Health and Safety Office

- Audits and Oversight
- Review MIT TCC IPM plans at least annually and submit plans to the regulatory agency (Massachusetts Department of Agricultural Resources – MDAR) on at least annual and as-needed basis
- Reporting to Regulatory Agencies
- Verify credentials / certifications of Pest Control services contractor
- Provide advice and consultation on regulatory and best practices for IPM
- Participate on the IPM Committee and the IPM R&M Working Committee

4.2 Center for Work-Life

- Ownership and Implementation of the TCC IPM Program
- Participate on the IPM Operations Committee
- Contract / Arrange for Pest Control Services
- Include IPM language and responsibilities in the Education Service Provider contract
- Monitor Education Service Provider adherence to the MIT IPM program requirements
- Act as liaison between various MIT personnel and Education Service Provider staff

4.3 Facilities

- Manage the Pest Control services contractor for the Stata TCC and the North Court spaces
- Maintain and communicate IPM incident data
- Train custodial staff in IPM practices
- Initiate and manage facilities repairs related to pest management (i.e. plug holes, repair pipes, etc)
- Obtain emergency waivers if necessary
- Manage the R&M IPM Working Committee
- Participate on the IPM Operations Committee

4.4 Housing

- Manage the Pest Control Services Contractor for Eastgate and Westgate TCC physical spaces
- Provide annual IPM training for Housing staff
- Participate on the IPM Operations Committee
- Initiate and manage Housing facilities repairs related to pest management (i.e. plug holes, repair pipes, etc.)
- Report pest incidents in SAP work order system (Facilities) for centralized recordkeeping and data management

4.5 Pest Management Services contractor
- Adhere to all provisions of the MIT pest control services contract
- Assure that only staff with up-to-date licenses and credentials provide services for which such licenses / credentials are required by regulations
- Communicate pest issues in accordance to the MIT IPM program and as requested by MIT Operational Unit contacts (i.e. Housing and Facilities management staff).
- Request application of pesticides only after justifying that other options are ineffective.
- Apply pesticides in or around Childcare Centers only after receiving specific authorization in that particular instance to do so
  - Use only pesticides allowed under the Massachusetts Children’s and Families’ Protection Act and as approved by the MIT IPM plan. Ask Operational Unit contact if parents have been notified at least three days prior to scheduled approved pesticide application
  - If necessary, request an emergency waiver through the Manager, Custodial Services

5. Records
The following records shall be maintained in accordance to the MIT EHS Office Records Retention Schedule
- MIT TCC IPM Plans
- EHS Office Annual Audit
- Training Records

6. Appendices
6.1 Authorized / Banned Pesticides list
6.2 Compliance Checklist for the Children’s and Families’ Protection Act
APPENDIX 6.1

AUTHORIZED / BANNED PESTICIDES FOR DAY CARE AREAS

ALL AUTHORIZATIONS FOR USE OF A CHEMICAL ARE CONDITIONAL UPON SAFETY AND VERIFICATION THAT NON-CHEMICAL APPROACHES HAVE BEEN SHOWN TO BE INEFFECTIVE

LIST OF PESTICIDES CONDITIONALLY AUTHORIZED FOR USE

The following list includes all the pesticides that may be used inside the Massachusetts Institute of Technology if other pest management approaches have shown to be ineffective. This list includes all herbicides, fungicides, and insecticides that will be used in the event that chemical is required.

<table>
<thead>
<tr>
<th>Pesticide Name</th>
<th>Active Ingredient</th>
<th>EPA Registration #</th>
<th>Target Pest</th>
<th>Rationale for use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maxforce Carpenter Ant Bait Gel</td>
<td>fipronil</td>
<td>64248-21</td>
<td>Ants</td>
<td></td>
</tr>
<tr>
<td>Maxforce roach Killer Bait Gel (Reservoir)</td>
<td>fipronil</td>
<td>64248-14</td>
<td>Roaches</td>
<td></td>
</tr>
<tr>
<td>Contrac Bloix</td>
<td>3-3[3-(4'Bromo[1,1'-giphenyl-4-yl]-3hydroxy-1-phenylpropyl]</td>
<td>12455-34</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maxforce ant</td>
<td>fipronil</td>
<td>64248-21</td>
<td>Ants</td>
<td></td>
</tr>
<tr>
<td>Rozol Pellets</td>
<td></td>
<td>7173-151</td>
<td></td>
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</tr>
<tr>
<td>Ditrac</td>
<td>diphascinona</td>
<td>12445-56</td>
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<tr>
<td>Tempo 1% Dust</td>
<td>cyfluthrin</td>
<td>3125-569</td>
<td></td>
<td></td>
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<tr>
<td>First Strike</td>
<td>difethialone</td>
<td>7173-258</td>
<td>Rats / Mice</td>
<td></td>
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</tbody>
</table>
Appendix 6.2

TCC Manager/Location: ____________________________
Auditor (please print and sign): ____________________
Date: ____________________________

IPM Audit of Technology Childcare Centers at MIT

### IPM Notebook and Records

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>The IPM record book has a copy of Care Provider training records and the Pest Control Services contractor license</td>
<td></td>
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<tr>
<td>2.</td>
<td>A list of authorized pesticides and the MSDS are available</td>
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<tr>
<td>3.</td>
<td>A communications list of phone numbers/emails/pager numbers is available</td>
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<td>4.</td>
<td>Authorized uses of pesticides have been documented</td>
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<td>5.</td>
<td>There is a process to notify the parents in the event of a chemical application</td>
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<tr>
<td>6.</td>
<td>Records of any emergency applications have been maintained</td>
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<td>7.</td>
<td>Training records for Care Providers are maintained</td>
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<tr>
<td>8.</td>
<td>A list of Steering Committee members are available to Care Providers</td>
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<td>9.</td>
<td>The parent's preferential means of contact prior to pesticide application is documented</td>
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<td>10.</td>
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<td>11.</td>
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</tbody>
</table>

### Training

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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</thead>
<tbody>
<tr>
<td>12.</td>
<td>All Care Providers have received annual IPM training in accordance with the MA Act Protecting Children and Families (2000)</td>
<td></td>
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<tr>
<td>13.</td>
<td>There is evidence of pest prevention techniques</td>
<td></td>
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<tr>
<td>14.</td>
<td>Care Providers know how to report a pest problem to the MIT DoF</td>
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<td></td>
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<tr>
<td>15.</td>
<td>Care Providers can recognize a pest presence</td>
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<tr>
<td>16.</td>
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</table>
### IPM Indoor Plan

<p>| | |</p>
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<tr>
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<tbody>
<tr>
<td>17.</td>
<td>Care Providers and the Pest Control Services contractor are familiar with the MIT IPM Indoor Plan</td>
</tr>
<tr>
<td>18.</td>
<td>A copy of the indoor plan is on location/electronically accessible</td>
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</tbody>
</table>

### Prevention

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<thead>
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<tbody>
<tr>
<td>19.</td>
<td>Food is not left in open containers</td>
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<tr>
<td>20.</td>
<td>Windows are closed, or have adequate screens</td>
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<tr>
<td>21.</td>
<td>Doors leading outside are closed at all times and have sweeps installed</td>
</tr>
<tr>
<td>22.</td>
<td>Openings in walls/ceilings/floors are reported to DoF for maintenance</td>
</tr>
<tr>
<td>23.</td>
<td>Garbage and garbage containers are emptied and cleaned regularly</td>
</tr>
</tbody>
</table>

### Comments:

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