

**Springfield School District  
Healthy and Safe Schools Plan  
July 1, 2019**

In 2017, the Oregon State Legislature passed SB 1062, which requires that, every school district, education service district, and public charter school develop a Healthy and Safe Schools Plan (HASS Plan). Each organization's HASS Plan has specific requirements that must be included for the HASS Plan to comply with state law. All HASS Plans are due to the Oregon Department of Education by July 1, 2019. Additionally, each school district, education service district, and public charter school is required to certify annually that the organization continues to comply with the requirement of the HASS Plan by filing an annual statement. The following information is specific to Springfield School District No. 19.



**SPRINGFIELD**  
PUBLIC SCHOOLS

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Every Student, Every Day

## 1. Responsible Person(s):

### The person responsible for administering the Healthy and Safe Schools Plan:

Name: Brett Yancey  
Position Title: Chief Operations Officer  
Phone Number: 541-726-3206  
Email Address: [brett.yancey@springfield.k12.or.us](mailto:brett.yancey@springfield.k12.or.us)  
Mailing Address: 640 A Street, Springfield, Oregon 97477

### The person who is the designated IPM Coordinator:

Name: Jason Zaske  
Position Title: Grounds Maintenance Worker  
Phone Number: 541-744-6375  
Email Address: [jason.zaske@springfield.k12.or.us](mailto:jason.zaske@springfield.k12.or.us)  
Mailing Address: 1890 42<sup>nd</sup> Street, Springfield, Oregon 97477

### The person responsible for AHERA Information:

Name: Terry Rutledge  
Position Title: Assistant Director of Facilities & Operations  
Phone Number: 541-744-6375  
Email Address: [terry.rutledge@springfield.k12.or.us](mailto:terry.rutledge@springfield.k12.or.us)  
Mailing Address: 1890 42<sup>nd</sup> Street, Springfield, Oregon 97477

## 2. List Facilities

All facilities owned and leased by the Springfield School District where students or staff are present on a regular basis are covered by this HASS Plan. The list of those buildings and facilities is below:

Building Name	Building Address
Academy of Arts and Academics	615 Main Street, Springfield, Oregon 97477
Administration Building	640 A Street, Springfield, Oregon 97477
Agnes Stewart Middle School	900 S. 32nd Street, Springfield, Oregon 97477
Brattain House	1030 G Street, Springfield, Oregon 97477
Briggs Middle School	2355 Yolanda Avenue, Springfield, Oregon 97477
Centennial Elementary School	1315 Aspen Street, Springfield, Oregon 97477

Building Name	Building Address
Douglas Garden Elementary School	3680 Jasper Rd, Springfield, Oregon 97477
Facilities & Operations Center	1890 N. 42 <sup>nd</sup> Street, Springfield, Oregon 97478
Gateways High School	425 10 <sup>th</sup> Street, Springfield, Oregon 97477
Guy Lee Elementary School	755 Harlow Rd, Springfield, Oregon 97477
Hamlin Middle School	326 Centennial Blvd, Springfield, Oregon 97477
Maple Elementary School	2109 J Street, Springfield, Oregon 97477
Mohawk Elementary School	91166 Sunderman Road, Springfield, OR. 97478
Mt Vernon Elementary School	935 Filbert Lane, Springfield, Oregon 97478
Page Elementary School	1300 Hayden Bridge, Springfield, Oregon 97477
Ridgeview Elementary School	526 66th Street, Springfield, Oregon 97478
Riverbend Elementary School	320 51st Street, Springfield, Oregon 97478
Springfield High School	875 7th Street, Springfield, Oregon 97477
Technology Center	525 Mill Street, Springfield, Oregon 97477
Thurston Elementary School	7345 Thurston Road, Springfield, Oregon 97478
Thurston High School	333 58th Street, Springfield, Oregon 97478
Thurston Middle School	6300 Thurston Road, Springfield, Oregon 97477
Two Rivers Dos Rios Elementary	1084 G Street, Springfield, Oregon 97477
Walterville Elementary School	40589 McKenzie Hwy, Springfield, Oregon 97478
Warehouse & Delivery Center	1898 N. 42 <sup>nd</sup> Street, Springfield, Oregon 97478
Yolanda Elementary School	2350 Yolanda Avenue, Springfield, Oregon 97477

### 3. Elevated Levels of Lead in Water Used for Drinking or Food Preparation

All school districts, education service districts, and public charter schools are required to test for and eliminate exposure to elevated levels of lead in water used for Drinking and Food Preparation through either remediation or eliminating access, according to OAR 333-061-0400 and OAR 581-022-2223. In conformance with those administrative rules, the Springfield School District certifies the following:

1. All testing was done according to the testing requirements in OAR 333-061-0400;
2. All samples were analyzed by a lab accredited by Oregon Health Authority to test for those materials;
3. All water fixtures required to be tested under OAR 333-061-0400 were tested for elevated levels of lead in accordance with the testing schedule developed by the Oregon Health Authority; and
4. The testing schedule for each building covered by this plan is set forth below and shall be tested no later than every six (6) years:

#### Lead Testing Schedule

Facility Name	Year of Last Test	Next Scheduled Test (per 6-year schedule)	Schedule or Exemption Reason
Academy of Arts & Academics	2016	2022	6 year schedule
Administration Building	NONE	2024	Remodel/Re-pipe 2018
Agnes Stewart Middle School	2016	2024	6 year schedule

Facility Name	Year of Last Test	Next Scheduled Test (per 6-year schedule)	Schedule or Exemption Reason
Brattain House	2016	2020	6 year schedule
Briggs Middle School	2016	2023	6 year schedule
Centennial Elementary School	2016	2019	6 year schedule
Douglas Gardens Elementary School	2016	2021	6 year schedule
Facilities & Operations Center	NONE	2023	6 year schedule
Gateways High School & Alt. Ed.	2016	2021	6 year schedule
Guy Lee Elementary School	2016	2019	6 year schedule
Hamlin Middle School	NONE	2024	Remodel/Re-pipe 2018
Maple Elementary School	2018	2024	6 year schedule
Mohawk Elementary School	NONE	2023	6 year schedule
Mt. Vernon Elementary School	2016	2019	6 year schedule
Page Elementary School	2016	2023	Water Re-Pipe 2016
Ridgeview Elementary School	2016	2022	6 year schedule
Riverbend Elementary School	2016	2019	6 year schedule
Springfield High School	2016	2020	6 year schedule
Technology Center	2016	2020	6 year schedule
Thurston Elementary School	2016	2024	6 year schedule
Thurston High School	2016	2022	6 year schedule
Thurston Middle School	2016	2021	6 year schedule
Two Rivers Dos Rios Elementary School	2016	2020	6 year schedule
Walterville Elementary School	2016	2022	6 year schedule
Warehouse & Delivery Center	NONE	2023	6 year schedule
Yolanda Elementary School	2016	2021	6 year schedule

**Summary Table (By Year):**

2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Centennial Elementary	Brattain House	Douglas Gardens Elementary	Academy of Arts & Academics	Briggs MS	Admin. Building
Guy Lee Elementary	Springfield HS	Gateways HS/Alt. Education	Ridgeview Elementary	Facilities & Operations	Agnes Stewart MS
Mt. Vernon Elementary	Technology Center	Thurston MS	Thurston HS	Mohawk Elementary	Hamlin MS
Riverbend Elementary	Two River Dos Rios Elementary	Yolanda Elementary	Walterville Elementary	Page Elementary	Maple Elementary
				Warehouse & Delivery Center	Thurston Elementary

The lead testing results are on file at the District Maintenance Facility located at:

**District Maintenance Facility  
1890 North 42<sup>nd</sup> Street  
Springfield, Oregon 97478**

or on the district website at: [www.springfield.k12.or.us](http://www.springfield.k12.or.us)

The designated contact person for questions related to lead in drinking water is:

Terry Rutledge  
Assistant Director of Facilities & Operations  
1890 42nd St.  
Springfield, OR 97477  
(541) 744-6375  
[terry.rutledge@springfield.k12.or.us](mailto:terry.rutledge@springfield.k12.or.us)

#### **4. Lead Paint**

In order to comply with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule, district staff are certified by the Oregon Health Authority to perform the work internally. If work cannot be completed by district staff, the district will only contract with certified lead based paint renovation contractors licensed by the Oregon Construction Contractors Board.

#### **5. Asbestos**

The Springfield School District complies with the federal Asbestos Hazard Emergency Response Act (AHERA). All required asbestos management plans are available for viewing by submitting a request to Terry Rutledge.

#### **6. Radon**

The Springfield School District has developed a radon plan as required by ORS 332.167.

##### Radon Plan

##### I. INTRODUCTION

The 2015 Legislature passed House Bill (HB) 2931 so that elevated radon levels in Oregon schools would be known. House Bill 2931 later became Oregon Revised Statute (ORS) 332.166-167. As directed by this statute, all school districts in Oregon must develop a plan to accurately measure school buildings for elevated radon levels. Per statute, actual testing of schools must be done on or before January 1, 2021 and the testing results sent to OHA and posted on Springfield School District's website.

This plan will develop the protocols necessary for compliance. OHA's Testing for Elevated Radon in Oregon Schools will be used to guide this effort. Below is the plan developed for Springfield School District.

##### II. OBJECTIVES

The Radon Management Plan objectives for radon screening & mitigation measurements in the Springfield School District are as follows:

1. Accurately carry out testing all facilities for elevated levels of radon, per ORS 332.166-167.
2. Develop a plan for mitigation for facilities with elevated levels of radon.
3. Communicate and educate staff and community about the risk of radon exposure.

##### III. SPRINGFIELD SCHOOL DISTRICT RADON PLAN COORDINATOR.

The Springfield School District Board designates Terry Rutledge, Assistant Director of Operations as the Radon Management Plan (RMP) Coordinator. The Coordinator is key to successful RMP implementation and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

- A. Assuring that all notification, posting, and record-keeping requirements in section VI are met when mitigation efforts are implied;
- B. Review and implement the District's RMP;
- C. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and staff) about the District's RMP;
- D. Overseeing Testing and Mitigation Efforts;
- E. The Coordinator will work with custodians, staff and maintenance to ensure exposure is minimized.
- F. Follow-up Measurement with RMP in the district (section V) is followed.
- G. Responding to inquiries and complaints about noncompliance with the plan. Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

#### IV. Springfield School District No. 19 RMP

Per ORS 332.166-167, School Radon Measurement Teams (i.e. personnel appointed to measure a school site for elevated radon) must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Testing will occur in all frequently occupied spaces simultaneously per site. Examples include: offices, classrooms, conference rooms and break rooms. A minimum of one detector for every 2,000-sq. ft. of open floor space or portion thereof is required. United States Environmental Protection Agency (US-EPA) studies indicate that radon levels on upper floors are not likely to exceed the levels found in ground-contact rooms. Testing rooms on the ground-contact floor or above unoccupied basements or crawlspaces is sufficient to determine if radon is a problem in a school. Areas such as restrooms, hallways, stairwells, elevator shafts, utility closets, kitchens storage closets do not need to be tested.

Initial and follow-up testing, as needed, will use passive test devices. Active devices (electrically powered, continuous radon monitors) may be used in follow-up testing of locations, if needed, where it is important to determine that radon levels vary according to the time of day. Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. "Closed building conditions" are defined as keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test. Testing will occur between October and March in any given school year. Short term testing will be used with passive test kits in "closed building conditions." Test kits will be placed during weekdays with HVAC (heating and ventilation) systems operating as they do normally. The following is a detailed protocol instruction checklist:

1. A Test Kit Placement Log and a Test Kit Location Floor Plan will be prepared for each site in which radon measurements are made. Schools will use their emergency/fire escape plan as a template. Test kit location will be accurately recorded on both a Log and Floor Plan. Test kits or testing services must meet the current requirements of the national certifying organizations, National Radon

Proficiency Program (NRPP, [www.nrpp.info](http://www.nrpp.info)) or the National Radon Safety Board (NRSB, [www.nrsb.org](http://www.nrsb.org)). Testing must be done following the directions on the test kit.

2. Per ORS 332.166-167, school radon measurement teams must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Room examples include offices, classrooms, conference rooms and break rooms.
3. The number of test kits used to measure radon (detectors) must be determined by counting the number of appropriate rooms. One detector kit is used for each room that is 2,000 square feet or less. Additional test kits are needed for larger rooms.
4. Added to this number will be the test kits needed for Quality Assurance purposes as determined by the Test Kit provider.
5. Test kits will be placed in all rooms in contact with the soil or located above a basement or crawlspace that are frequently occupied by students and staff.
6. Testing will occur during the time that students and teachers are normally present (during weekdays).
7. In addition to placing detectors, additional test kits will be provided to serve as quality assurance measures (duplicate, blank, and spike measurements). Quality Assurance procedures will be conducted as described in OHA's Testing for Elevated Radon in Oregon Schools.
8. All test kits placed in the school site (detectors, duplicates, and blanks) must be noted on the Device Placement Log and Floor Plan by their serial number.
9. Test kits should be placed.
  - a. Where they are least likely to be disturbed or covered up.
  - b. At least three feet from doors, windows to outside or ventilation ducts.
  - c. At least one foot from exterior walls.
  - d. At least 20 inches to six feet from floor.
  - e. About every 2,000 square feet for large spaces (e.g., a 3500-square foot gymnasium would require two test kits)

Along with the five-item placement protocol above, School Radon Measurement Teams can simply place the test kit on the teacher's desk or up on a bookshelf, out of the way of students. To prevent tampering, kits may be suspended from a wall or ceiling (using string and thumb-tack/tape). If they are suspended, they should be 20 inches to 6 feet above the floor, at least 1 foot below the ceiling.

10. Test kits must NOT be placed:
  - a. Near drafts resulting from heating, ventilating vents, air conditioning vents, fans, doors, and windows.



- b. In direct sunlight.
- c. In areas of high humidity such as bathrooms, laundry rooms, etc.
- d. Where they may be disturbed at any time during the test
- e. Testing with short-term test kits must be used under closed conditions (closed windows/doors except for normal exit/entry).
- f. Closed conditions: Short-term tests should be made under closed conditions in order to obtain more representative and reproducible results. Open windows and doors permit the movement of outdoor air into a room. When closed conditions in a room are not maintained during testing, the subsequent dilution of radon gas by outdoor air may produce a measurement result that falls below the action level in a room that actually has a potential for an elevated radon level. Schools shall only be tested for radon during periods when the HVAC system is operating as it does normally.
- g. All external doors should be closed except for normal use – structural and weatherization defects need to be repaired prior to testing.
- h. Closed conditions must be verified when placing and retrieving test kits.
- i. Short-term test kits will be placed during colder months (October through March).
- j. Colder months: Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. During these months, windows and exterior doors are more likely to be closed. In addition, the heating system is more likely to be operating. This usually results in the reduced intake of outside air. Moreover, studies of seasonal variations of radon measurements in schools found that short-term measurements may more likely reflect the average radon level in a room for the school year when taken during the winter heating season. The District will check and document local weather forecasts prior to placing test kits. It is not recommended to initiate short-term measurement kits (2-5 days) during severe storms or period of high winds. The definition of severe storm by the National Weather Service is one that generates winds of 58 mph and/or ¾ inch diameter hail and may produce tornadoes.

11. Test Kits will be placed during weekdays with HVAC (heating and ventilation) systems operating as they do normally.

12. Suggested timeline:

Monday morning – Place kits (detectors/duplicates/blanks) per Test Kit Placement Log created for school. Record data, as needed, on Log.

Thursday morning – Pick up kits, record as needed, ship with (previously requested & received) spiked test kits to Radon Measurement Laboratory.

13. The District will conduct initial measurements under the following conditions:

- a. Air conditioning systems that recycle interior air may be operated.
- b. Window air conditioning units may be operated in a re-circulating mode, but must be greater than 20 feet from the test kit.
- c. Ceiling fans, portable humidifiers, dehumidifiers and air filters must be more than 20 feet

from the test kit.

- d. Portable window fans should be removed or sealed in place.
- e. Fireplaces or combustion appliances (except for water heaters/cooking appliances) may not be used unless they are the primary source of heat for the building.
- f. If radon mitigation systems are in place in the school, they should be functioning.

14. The District will not conduct initial measurements under the following conditions:

- a. During abnormal weather or barometric conditions (e.g., storms and high winds). If major weather or barometric changes are expected, it is recommended that the 2 to 5-day testing be postponed. USEPA studies show that barometric changes affect indoor radon concentrations. For example, radon concentrations can increase with a sudden drop in barometric pressure associated with storms.
- b. During structural changes to a school building and/or the renovation of the building's envelope or replacement of the HVAC system. After receiving the results of the initial testing, School Radon Measurement Teams will follow the "Interpreting initial results" section of the OHA's Testing for Elevated Radon in Oregon Schools.

#### V. FOLLOW-UP MEASUREMENTS

Follow-up testing (in rooms with initial short-term measurement of 4.0 pCi/L or higher) should start within one month after receiving the initial test results. Follow-up testing must be made in the same location in a room. When conducting follow-up testing using short-term methods will be done in the same conditions as the initial measurement. Follow-up testing using passive short-term test kits should follow the same Quality Assurance procedures and requirements (i.e. percentages of duplicates/blanks/spikes), including quality assurance calculations. Follow directions under Radon Test Placement Strategy and Protocol Checklist and Test Kit Placement again.

#### VI. REPORT OF RESULTS & DISTRIBUTION

ORS 332.166-167 requires that school districts make all test results available: to the district's school board; the Oregon Health Authority (to post on its website), and readily available to parents, guardians, students, school employees, school volunteers, administrators and community representatives at the school office, district office or on a website for the school or school district.

US EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups recommend that the school district take action to reduce the radon level in those rooms where the average of the initial and follow-up short-term kit results OR the result of the long-term kit used in follow-up is 4.0 pCi/L or more.

The Springfield School District has adopted a radon plan as required by ORS 332.167. Community members can access a copy of the radon plan and results at the District Maintenance Facility located at:

**District Maintenance Facility  
1890 North 42<sup>nd</sup> Street  
Springfield, Oregon 97478**

or on the district website at: [www.springfield.k12.or.us](http://www.springfield.k12.or.us)

The designated contact person for questions related to radon testing is:

Terry Rutledge  
Assistant Director of Facilities & Operations  
1890 42nd St.  
Springfield, OR 97477  
(541) 744-6375  
[terry.rutledge@springfield.k12.or.us](mailto:terry.rutledge@springfield.k12.or.us)

## **7. Integrated Pest Management**

The Springfield School District has adopted an Integrated Pest Management (IPM) plan as required by ORS 634.700 through 634.750. The plan is:

# Integrated Pest Management Plan Springfield School District

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## **I. INTRODUCTION**

Structural and landscape pests can pose significant problems in schools. Pests such as mice and cockroaches can trigger asthma. Mice and rats are vectors of disease. Many children are allergic to yellow jacket stings. The pesticides used to remediate these and other pests can also pose health risks to people, animals, and the environment. These same pesticides may pose special health risks to children due in large part to their still- developing organ systems. Because the health and safety of students and staff is our first priority – and a prerequisite to learning – it is the policy of Springfield School District Board of Directors to approach pest management with the least possible risk to students and staff. In addition, Senate Bill 637 (incorporated into ORS Chapter 634 upon finalization in 2009) requires all school districts to implement integrated pest management in their schools.

For this reason, the Board of Directors adopts this integrated pest management plan for use on the campuses of our district.

## **II. WHAT IS INTEGRATED PEST MANAGEMENT?**

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

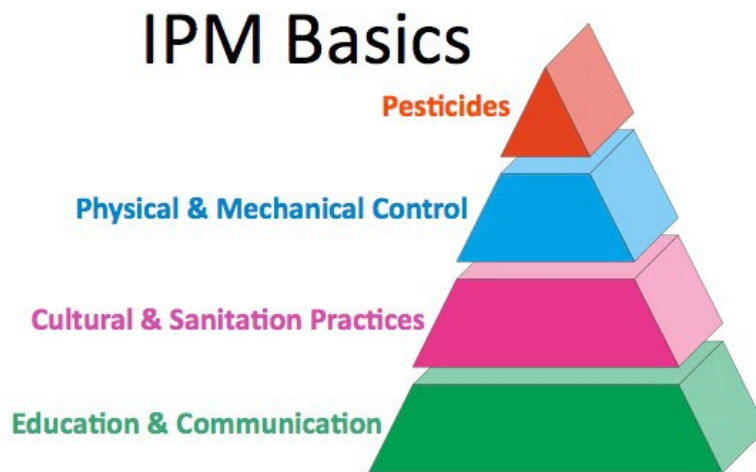
### **IPM Basics**

Education and Communication: The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*

Cultural & Sanitation: Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

Physical & Mechanical: Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.

Pesticides: IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.



### III. WHAT IS AN INTEGRATED PEST MANAGEMENT PLAN?

ORS 634.700 defines an IPM plan as a proactive strategy that:

- (A) Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:
  - a) Protect the health and safety of students, staff and faculty;
  - b) Protect the integrity of campus buildings and grounds;
  - c) Maintain a productive learning environment; and
  - d) Protect local ecosystem health;
- (B) Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;
- (C) Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;
- (D) Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;
- (E) Evaluates the need for pest control by identifying acceptable pest population density levels;



- (F) Monitors and evaluates the effectiveness of pest control measures;
- (G) Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;
- (H) Excludes the application of pesticides for purely aesthetic purposes;
- (I) Includes school staff education about sanitation, monitoring and inspection and about pest control measures;
- (J) Gives preference to the use of nonchemical pest control measures;
- (K) Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and
- (L) Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The above definition is the basis for Springfield School District's IPM plan. This plan fleshes out the required strategy from ORS 634.700 – 634.750 for the Springfield School District.

**Note:** As mentioned above, ORS 634.700 allows for the routine application of pesticides designed to be consumed by pests. To avoid a proliferation of pests and/or unnecessary applications of pesticides, several steps must be taken before **any** "routine" applications are allowed:

- A. Staff must be educated on sanitation, monitoring, and exclusion as the primary means to control the pest.
- B. An acceptable pest population density level must be established.
- C. The use of sanitation, structural remediation or habitat manipulation, or of mechanical or biological control methods must be incorporated into the management strategy of the pest.
- D. Documentation that the above steps were ineffective.
- E. The pesticide label must be read thoroughly to make sure the pesticide will be used in strict compliance with all label instructions.

#### **IV. SCHOOL DISTRICT IPM PLAN COORDINATOR**

The Springfield School District designates Jason Zaske as the IPM Plan Coordinator. The Coordinator is key to successful IPM implementation in the Springfield School District and is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

**A. Attending not less than six hours of IPM training each year**

The training will include a general review of IPM principles and the requirements of ORS 634.700 – 634.750. It will also include hands-on training on updated exclusion practices, monitoring & inspection techniques, and management strategies for common pests.

ORS 634.720 requires IPM plan coordinators to complete six hours of training each year. Contact your property and liability insurance provider, your Education Service District, or the OSU School IPM Program for information on IPM coordinator training courses that cover the above.

**B. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school’s IPM plan;** The IPM Plan Coordinator (or designee) will provide training as outlined in Section VII below.

**C. Overseeing pest prevention efforts;**

The Coordinator will work with custodians, teachers, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points.

**D. Assuring that the decision-making process for implementing IPM in the district (section V) is followed;**

The Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.

**E. Assuring that all notification, posting, and record-keeping requirements in section VI are met when the decision to make a pesticide application is made;**

**F. Maintaining the approved pesticides list as per section VIII; and**

**G. Responding to inquiries and complaints about noncompliance with the plan.** Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.

**V. IPM DECISION-MAKING PROCESS**

**A. Responsibilities of School District Employees**

IPM Plan Coordinator Responsibilities:  
See Section IV above

**1. Custodial Services Responsibilities**

Custodial Services staff are responsible for the for the following:

- 1) Attending annual IPM training provided by the Custodial Supervisor.
- 2) Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan Coordinator’s instructions.
- 3) Keeping records of pest complaints using pest logs placed in the staff lounge, cafeteria, and kitchen.

- 4) Assuring floor under serving counters is kept free of food and drink debris.
- 5) Sealing up small cracks or holes when reported by teachers or noticed by custodian when this can be done in a short time.
- 6) Recording his/her pest management actions in the pest logs.
- 7) Reporting pest problems that he/she cannot resolve in less than 15 minutes to the IPM Plan Coordinator.
- 8) Reporting teachers to the IPM Plan Coordinator who need assistance to reduce clutter and other pest-conducive conditions in their classrooms.
- 9) Reporting pest-conducive conditions to the IPM Plan Coordinator if the custodian cannot fix them in less than 15 minutes.
- 10) Following up on issues found in annual inspection report as instructed by the IPM Plan Coordinator (IPM Plan Coordinator will determine which schools receive annual inspections based on pest and pesticide use history).

## **2. Maintenance/Construction Responsibilities**

Staff involved in facilities maintenance and construction is responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

- 1) Receiving training from the IPM Plan Coordinator (or designee of the Coordinator) on the basic principles of IPM, sealing pest entry points, and sanitation during construction projects.
- 2) Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed.
- 3) Working with the Coordinator to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time.
- 4) Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Plan Coordinator has the authority to halt construction projects if these protocols and provisions are not being met.

## **3. Grounds Department Responsibilities**

Grounds crews are responsible for:

- 1) Attending training provided by the Grounds Foreman or designee.
- 2) Keeping vegetation (including tree branches and bushes) at least two feet from building surfaces.

- 3) Proper mulching in landscaped areas to reduce weeds.
- 4) Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds.
- 5) When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VI.

#### **4. Kitchen Staff Responsibilities**

Kitchen staff are responsible for:

- 1) Attending training provided by the Nutrition Services Supervisor.
- 2) Assuring floor under serving counters is kept free of food and drink debris.
- 3) Promptly emptying and removing corrugated cardboard materials.
- 4) Keeping exterior kitchen doors closed.
- 5) Reporting pest conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, build-up of floor grease requiring spray- washing, etc.) to proper staff verbally or using pest logs.
- 6) Participating in any inspections conducted by custodian or IPM Plan Coordinator.
- 7) Checking sticky trap monitors once per month for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings to custodian and marking them in pest log.

#### **5. School Faculty Responsibilities**

School faculty are responsible for:

- 1) Attending annual basic IPM training provided by the custodial staff.
- 2) Keeping their classrooms and work areas free of clutter.
- 3) Making sure students clean up after themselves when food or drink is consumed in the classroom.
- 4) Reporting pests and pest conducive conditions to the custodian, either orally or via the pest logs.
- 5) Following first steps of protocol for ant management before notifying the custodian (clean up any food the ants are eating, kill visible ants, wipe down area where ants were with soapy water, notify custodian only if ants continue to be found after following these steps).

## 6. School Principal Responsibilities

The School Principal is responsible for:

- 1) Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Plan Coordinator's instructions.
- 2) Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents.
- 3) Assuring that all staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions, participation in monitoring and pest log recording, attendance at IPM training(s), cooperation with the district's IPM Plan Coordinator).

## B. Monitoring – Reporting – Action Protocol

Monitoring is the most important requirement of ORS 634.700 – 634.750. It is the backbone of the Springfield School District's IPM Program. It provides recent and accurate information to make intelligent and effective pest management decisions. It can be defined as the regular and ongoing inspection of areas where pest problems do or might occur. Information gathered from these inspections is always written down.

As much as possible, monitoring should be incorporated into the daily activities of school staff. Staff training on monitoring should include what to look for and how to record and report the information.

### 1. Three levels of monitoring

There are three levels of monitoring:

- 1) Casual observing/looking with no record keeping is not helpful
- 2) Casual observing/looking with written observations can be useful
- 3) Careful inspections with written observations is always useful

#### Level 2 monitoring (all staff)

All staff will be trained to improve their "casual observing/looking" to level 2, and to report any pests and pest-conducive conditions they observe. Level 2 monitoring is conducted by faculty, administration, maintenance/construction, kitchen staff, school nurses, etc.

After a brief (15 – 20 minute) training by the IPM Plan Coordinator (or designee) on pests and pest conducive conditions, staff will be expected to report pests or pest conducive conditions they observe during the normal course of their daily work.

Reporting will be done by jotting observations down in a Pest Log or reporting them to the custodian for him/her to write them down.

#### Level 3 monitoring (Coordinator and Custodial staff)

The IPM Plan Coordinator (or designee) and Custodians will periodically conduct monitoring at level 3. Coordinator and Custodial staff will monitor structures:

- Pest conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage)

- The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
- The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
- Human behaviors that affect the pests (working conditions that make it impossible to close doors or screens, food preparation procedures that provide food for pests, etc.)
- Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

### Level 3 monitoring (Grounds staff)

Grounds staff will monitor Turf and Landscape:

- The condition of the plants (vigor and appearance)
- The amount of plant damage
- Proper drainage
- Human behaviors that affect the plants or pests (foot traffic that compacts the soil, physical damage to plants caused by people, insistence on having certain plants grow in inappropriate situations, etc.)
- Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

### **2. Sticky monitoring traps for insects**

Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence, their reproductive stage, the likely direction pests are coming from, and the number of pests.

All staff will be made aware of the traps and their purpose so they don't disturb them. Custodians will be responsible for setting them out and checking them once per month (approximately 10 minutes), and replacing them once every four months (approximately 30 minutes). Kitchen staff will be responsible for checking those in the kitchen primarily for cockroaches and drain flies once per week (approximately 4 minutes).

After receiving training in the use of pest monitoring sticky traps by the IPM Plan Coordinator (or designee), custodial staff will be responsible for checking traps placed in pre-determined "pest-vulnerable areas" in the staff room, kitchen, and cafeteria on a monthly basis.

### **3. Reporting (pests, signs of pests, and conducive conditions)**

When staff observe pests or pest conducive conditions they should jot them down in

a Pest Log or report them to the custodian for him/her to write them down.

#### **4. Reporting “Pests of Concern”**

“A pest of concern” is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice & rats (disease vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest).

When pests of concern (or their droppings, nests, etc.) are observed, staff should immediately tell the building custodian. The custodian must contact the IPM Plan Coordinator immediately.

#### **5. Action!**

##### **Structural**

Any items (such as sealing up holes) that maintenance/construction staff or custodial staff observe (or see on Pest Logs) that they can resolve on site by staff should be taken care of and this follow up action should be noted in the Pest Log.

Custodial staff will review Pest Logs. Any items he/she cannot resolve on site should be marked in order of priority. Work orders to facilities should be generated for these items.

Pest Logs will be faxed to the IPM Plan Coordinator once per week. The Coordinator will determine further actions to be taken and when.

If the actions needed are not something the Coordinator can accomplish alone or with minimal assistance, the Coordinator will meet with the appropriate staff to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion or pest management needs. The Coordinator/Foreman will then generate a work order with a proposed deadline for completion based on the severity of the risk or nuisance.

The Coordinator/Forman will monitor the completion of the work order.

The Coordinator will keep records of time and money spent to manage the pest, including copies of original receipts.

Small Ants:

When staff observe a small number of ants they must:

- 1st) Spend two minutes trying to find out where the ants are coming from
- 2nd) Kill the ants with a paper towel or similar
- 3rd) Remove any food or liquid the ants were eating
- 4th) Wipe down the area with soapy water or disinfectant to remove pheromone trails
- 5th) Jot down the above in the Pest Log

If the ants come back or there are more than a small number of them:

- 1) Spend a few minutes trying to find out where the ants are coming from
- 2) Jot down the above in the Pest Log
- 3) Ask the custodian to come with vacuum and sealant as soon as possible

The custodian will:

Spend a few minutes trying to find out where the ants are coming from

- a) Vacuum up the ants and any food debris nearby (vacuum up a tablespoon of corn starch to kill most of the ants in the vacuum bag, then put the vacuum bag inside plastic garbage bag, seal it, and dispose of it properly)
- a) Seal up the crack or hole where the ants were coming
- b) Wipe down the area with soapy water or disinfectant to remove pheromone trails
- c) Jot down the above in the Pest Log

To avoid a proliferation of small ants and/or unnecessary applications of pesticides, the routine use of ant baits is not permitted without first:

- a) 1st) Educating staff on sanitation, monitoring, and exclusion as the primary means to control the ants.
- b) 2nd) Establishing an acceptable pest population density.
- c) 3rd) Improving sanitation (e.g. cleaning up crumbs and other food sources) and structural remediation (sealing up cracks or holes where the ants are coming from).

### Grounds

When pests on grounds reach a threshold established by the Grounds staff and Foreman, action will be taken as determined by the Foreman.

Acceptable Thresholds (pest population density levels)

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Plan Coordinator.

## **C. Inspections**

### **Routine Inspections**

The IPM Plan Coordinator will conduct routine inspections of different schools throughout the. Site custodians are required to accompany the Coordinator during the inspections. The inspections will typically will focus on compliance with this plan and an inspection of the kitchen, staff room, and any other place of concern.

### **Annual Inspections**

The IPM Plan Coordinator will conduct annual inspections at individual schools. Site custodians are required to assist the Coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the Annual IPM Inspection Form to guide the inspections. The specific schools to be inspected will be determined by the IPM Plan Coordinator based on a review of the of pest problems reported in the Annual IPM Report and Annual Report of Pesticide Applications.



#### **D. Pest Emergencies (see also Section VII. B. below)**

IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps. When the IPM Plan Coordinator, after consultation with school faculty and administration, determines that the presence of a pest or pests immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school building.

#### **E. Annual IPM Report (completed by IPM Plan Coordinator)**

In January of each year, the IPM Plan Coordinator will provide the School Board an annual IPM report. The report will include a summary of data gathered from Pest Logs, as well as costs for PMPs and pesticides (including turf and landscape pesticides).

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be copied and pasted or incorporated into the annual report of pesticide applications (see section VII. D)

### **VI. REQUIRED TRAINING/EDUCATION**

ORS 634.700 (3) (i) requires staff education “about sanitation, monitoring and inspection and about pest control measures”. All staff should have at least a general review of IPM principles and strategy as outlined in Sections II and III.

#### **A. IPM Plan Coordinator Training**

ORS 634.720 (2) requires that the IPM Plan Coordinator “shall complete not less than six hours of training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 to 634.750.”

Content should include health and economic issues associated with pests in schools, exclusion practices, pest identification and biology for common pests, common challenges with monitoring-reporting-action protocols, proper use of sticky monitoring traps for insects, and hands-on training on proper inspection techniques.

Contact your Education Service District or the OSU School IPM Program for information on OSU-approved training courses.

#### **B. Training for Custodial Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train custodial staff at least annually on sanitation, monitoring, inspection, and reporting, and their responsibilities as outlined in Section V. A.

#### **C. Training for Maintenance and Construction Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train maintenance staff at least annually on identifying pest conducive conditions and mechanical control methods (such as door sweeps on external doors and sealing holes under sinks), and their responsibilities as outlined in Section V. A.

#### **D. Training for Grounds Staff**

The head of grounds staff (or designee) will train grounds staff at least once per year. Each year before the training, the head of grounds staff will meet with the IPM Plan Coordinator to review the annual report of pesticide applications and plan training for all grounds staff. The annual training will review this IPM Plan (especially grounds department responsibilities outlined in Section V.A.) and data from the annual report related to pesticide applications by grounds crew. It will also review the OSU turf management publications (available free online at <http://extension.oregonstate.edu/catalog/>).

Grounds Staff will also be trained in basic monitoring for common pests on grounds.

#### **E. Training for Kitchen Staff**

The IPM Plan Coordinator (or a designee of the Coordinator) will train kitchen staff at least once per year on the basic principles of IPM and their responsibilities as outlined in Section V. A.

#### **F. Training for Faculty and Principal**

The IPM Plan Coordinator (or a designee of the Coordinator) will train faculty and principals at least once per year on the basic principles of IPM and their responsibilities as outlined in Section V. A. These short (15 – 20 minutes) training are arranged by the Coordinator with individual principals when openings in their school Faculty Meeting schedules permit.

#### **G. Other Training**

Basic training on the principals of IPM and the main points of this IPM Plan should also be provided to school nurses, administrative staff, superintendents, and students. Coaches who use athletic fields should be given an overview of basic monitoring and IPM practices for turf so they understand key pest problems to look out for and when to report them.

### **VII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING**

Any pesticide application (this includes weed control products, ant baits, and all professional and over-the-counter products) on school property must be made by a licensed commercial or public pesticide applicator. At the beginning of each school year, all faculty, administrators, staff, adult students and parents will be given a list of potential pesticide products that could be used in the event that other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies.

#### **A. Notification and Posting for Non-emergencies**

When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. *Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator.*

No non-emergency pesticide applications may occur in or around a school before 8:00 am while school is in session unless the IPM Plan Coordinator authorizes an exception. If the labeling of a pesticide product specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of that reentry time. If the labeling does not specify a reentry time, a pesticide may not be applied to an area of a campus where the school expects students to be present before

expiration of a reentry time that the IPM Plan Coordinator determines to be appropriate based on the times at which students would normally be expected to be in the area, area ventilation and whether the area will be cleaned before students are present.

The IPM Plan Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application via email to the lead custodian and posting at least 24 hours before the application occurs.

The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator (or a designee of the Coordinator) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Plan Coordinator).

## **B. Notification and Posting for Emergencies**

Important Notes:

- 1) *The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration.*
- 2) *If a pesticide is applied at a campus due to a pest emergency, the Plan Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a written report of such School Board.*
- 3) *The School Board shall review and take formal action on any recommendations in the report.*

The declaration of the existence of a pest emergency is the only time a non low-impact pesticide may be applied.

If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.

The IPM Plan Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs.

Note: ORS 634.700 also allows the application of a non-low-impact pesticide "by, or at the direction or order of, a public health official". If this occurs, every effort must be made to comply with notification and posting requirements above.

### **C. Record Keeping of Pesticide Applications**

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file at the IPM Plan Coordinators office:

- A copy of the label
- A copy of the MSDS
- The brand name and USEPA registration number of the product
- The approximate amount and concentration of product applied
- The location of the application
- The pest condition that prompted the application
- The type of application and whether the application proved effective
- The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide
- The name(s) of the person(s) applying the pesticide
- The dates on which notices of the application were given
- The dates and times for the placement and removal of warning signs
- Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices

The above records must be kept on file at the IPM Plan Coordinator for at least four years following the application date.

### **D. Annual Report of Pesticide Applications**

In January of each year, the IPM Plan Coordinator will provide the School Board an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

- The brand name and USEPA registration number of the product applied
- The approximate amount and concentration of product applied
- The location of the application
- The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application
- The type of application and whether the application proved effective

## **VII. APPROVED LIST OF LOW-IMPACT PESTICIDES**

Note: All pesticides used must be used in strict accordance with label instructions.

According to ORS 634.705 (5), the governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest management plan. The governing body may include any product on the list except products that:

- a) Contain a pesticide product or active ingredient that has the signal words "warning" or "danger" on the label;
- b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
- c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of

Pesticide Programs (OPP) classifies pesticide active ingredients (a.i.) with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center (<http://npic.orst.edu/>) can be contacted at 1.800.858.7378 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu) for assistance in determining a pesticide a.i. cancer classification.

The most current list of approved low-impact pesticides is available the OSU website at [http://blogs.oregonstate.edu/schoolipm/files/Low\\_Impact\\_Pesticide\\_List.pdf](http://blogs.oregonstate.edu/schoolipm/files/Low_Impact_Pesticide_List.pdf)

## 8. Carbon Monoxide:

Springfield School District certifies that all buildings subject to the Healthy and Safe Schools Plan comply with the carbon monoxide detection standards in the state building code that was in effect when the building was originally constructed or as required by building code due to addition, upgrade, or remodel.

## 9. Testing Results:

Springfield School District is complying with the requirement to provide access to test results, as defined by OAR 581-022-2223 within 10 business days as defined by ORS 332.334. Test results can be found on the District website. Additionally, copies of all test results will be available at Springfield School District's administration office. Springfield School District will use current district email lists or communications programs to provide final test results to staff, students, parents of minor students, and other members of the community. This includes providing actual final test results or providing direct access to final test results through links in the communications. Please contact the District's Community Engagement Officer (541-726-3213) to be added to current district email lists and programs.

**I certify that the above information is true and accurate to the best of my knowledge.**

<i>Brett M. Yancey</i>	Chief Operations Officer	10/14/2019
<b>Signature of authorized representative</b>	<b>Title</b>	<b>Date</b>

