

**BOARD OF EDUCATION OF THE CITY OF LOS ANGELES  
GOVERNING BOARD OF THE LOS ANGELES UNIFIED SCHOOL DISTRICT**

**INTEGRATED PEST MANAGEMENT AD HOC COMMITTEE**

333 South Beaudry Avenue, Board Room  
Los Angeles, CA 90017  
9:00 a.m., Tuesday, August 27, 2024

**Committee Members**

Mr. Scott Schmerelson, Chairperson  
Ms. Sandra Schubert, Community Member  
Mr. Mark Cho, Deputy Director, Maintenance and Operations, LAUSD Representative

**Board Secretariat Contact**

Ms. Miriam Gonzalez  
Tel: (213) 241-7002  
Email: [m.gonzalezledesm@lausd.net](mailto:m.gonzalezledesm@lausd.net)

**Method for Accessing the Meeting and Providing Public Comment**

There are three ways members of the public may access this Committee Meeting: (1) online ([Granicus stream](#) or join the [zoom webinar](#)), (2) by telephone by calling 1-888-475-4499 (Toll Free) and entering the Meeting ID: **879 7060 8197**, or (3) in person.

The Board of Education encourages public comment on the items on this agenda and all other items related to the District. Any individual wishing to address the Board must register to speak using the Speaker Sign Up website: <https://boardmeeting.lausd.net/speakers>, and indicate whether comments will be provided over the phone or in person. Registration will open 24 hours before the meeting. A maximum of **15** speakers may sign up for general Public Comment, and each speaker will have **two** minutes to present. Each speaker will be allowed a single opportunity to provide comments to the Committee.

Speakers who do not register online to provide comments may use the following alternative methods to provide comments to Board Members:

- Email all Board Members at [boardmembers@lausd.net](mailto:boardmembers@lausd.net);
- Mail comments via US Mail to 333 S. Beaudry Ave., Los Angeles, CA 90017; and
- Leave a voicemail message at (213) 443-4472, or fax (213) 241-8953. Communications received by 5 p.m. the day before the meeting will be distributed to all Board Members.

Speakers registered to provide public comments over the phone need to follow these instructions:

1. Call 1-888-475-4499 (Toll Free) and enter Meeting ID: **879 7060 8197** at the beginning of the meeting.
2. Press #, and then # again when prompted for the Participant ID.
3. Remain on hold until it is your turn to speak.

4. Call in from the same phone number entered on the Speaker Sign Up website. If you call in from a private or blocked phone number, we will be unable to identify you.
5. When you receive the signal that your phone has been removed from hold and/or unmuted, please press \*6 (Star 6) to be brought into the meeting.

The Office of the Inspector General would like to remind you that they investigate the misuse of LAUSD funds and resources as well as retaliation for reporting any misconduct. Anyone can make a report via the OIG hotline on their website (<https://www.lausd.org/oig>), by telephone at 213-241-7778, or by emailing [inspector.general@lausd.net](mailto:inspector.general@lausd.net). Reports are confidential, and you can remain anonymous if you wish.

Please contact the Board Secretariat at 213-241-7002 if you have any questions.

## **AGENDA**

- I. Welcome and Opening Remarks** .....Mr. Scott Schmerelson  
Chairperson
- II. Nominations of Current IPM Team Members**  
for a Temporary 60-Day Term.....Committee / District Staff
- III. Status of Recommended Corrections Contained**  
in OIG Report on District IPM Operations .....Committee / District Staff
- IV. Public Comment**
- V. Adjournment**

Requests for disability-related modifications or accommodations shall be made 24 hours prior to the meeting to the Board Secretariat by calling (213) 241-7002.

Materials related to an item on this agenda distributed to the Board of Education are available for public inspection at the Security Desk on the first floor of the Administrative Headquarters, and at:  
<https://www.lausd.org/boe#calendar73805/20240827/event/72578>



## Board of Education Report

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File #: Rep-107-22/23, Version: 1

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**Integrated Pest Management Referral****November 15, 2022****Office of the Board Secretariat****Action Proposed:**

Refer the Integrated Pest Management (“IPM”) Team to an ad hoc committee to: (1) receive and consider one-time nominations of current IPM Team members for a temporary term of 60 days; (2) bring the Team and the District back into compliance with the IPM Policy; and (3) review and propose corrective actions addressing the findings contained in the June 29, 2022 Office of Inspector General (hereinafter, “OIG”) report regarding IPM.

**Background:**

The District’s Board adopted and implemented the LAUSD Integrated Pest Management Policy on March 23, 1999 (hereinafter, “*Policy*”; *see* Attachment A). The IPM Team serves to provide guidance, verification, and recommendations to support the District’s goal of Integrated Pest Management, providing for the safest and lowest risk approach to control pest problems while protecting people, property and the environment. The District operates its pest control activities within the framework of the *Policy*, which itself conforms to the standards of the Healthy Schools Act (hereinafter, “HSA”). Further, the *Policy* articulates terms and guidelines by which the Team must act and specifies how the Team is to be constituted.

On June 29, 2022, an OIG audit (*see*, Attachment B) found that the IPM Program was largely compliant with its own *Policy* and that of the HSA. However, the audit revealed procedural issues, notably: (1) A lack of an effective training program for stakeholders; (2) a need for a document review process to ensure HSA compliance; and (3) a need to realign the IPM Team appointments and recruitment with the stated IPM Policy.

Contrary to the requirements of the IPM Policy, neither the Board nor any committee has approved IPM Team members for approximately 10 years. As a result, all current members of the IPM Team have not been approved by the Board.

**Expected Outcomes:**

Referral of the IPM Team to an ad hoc committee to receive and consider one-time nominations of IPM Team members for a temporary term of 60 days. The IPM Team will continue to meet under the one-time approval for the duration of 60 days, serving their intended purpose and in conformity with the strictures of the Brown Act such that there is no further interruption to the necessary work of the IPM Team, which includes proposing corrective actions to address the findings of the June 29, 2022 OIG report.

**Board Options and Consequences:**

A “yes” vote will create an ad hoc committee which is empowered to receive and consider one-time nominations of the IPM Team members for a temporary term in order to continue the service of the IPM Team of providing guidance, verification, and recommendations to support the District’s goal of Integrated Pest Management.

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A “no” vote will cause a continued disruption to the IPM Team and fail to provide a path to remedy, among other things, the concerns raised in the OIG report.

**Policy Implications:**

This action is meant to commence the process of properly reconstituting the IPM Team, and restore compliance with the IPM Policy and law, while providing a path forward for addressing the concerns raised by the OIG report.

**Budget Impact:**

None

**Student Impact:**

District and IPM Team compliance to the IPM Policy will continue to ensure safe conditions for students, staff and school communities.

**Equity Impact:**

Not applicable.

**Attachments:**

Attachment A - “Los Angeles Unified School District Integrated Pest Management Policy”

Attachment B - “Performance Audit of Integrated Pest Management Program”

**Informatives:**

None

**Submitted:**

11/03/2022

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File #: Rep-107-22/23, Version: 1

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**APPROVED & PRESENTED BY:**



MICHAEL McLEAN  
Executive Officer of the Board

**REVIEWED BY:**



DEVORA NAVERA REED  
General Counsel

☒ Approved as to form.

## **LOS ANGELES UNIFIED SCHOOL DISTRICT INTEGRATED PEST MANAGEMENT POLICY**

### **POLICY STATEMENT**

It is the policy of the Los Angeles Unified School District (District) to practice Integrated Pest Management (IPM). All aspects of this program will be in accordance with federal and state laws and regulations, and county ordinances. All District policies must conform to this IPM policy.

Pesticides pose risks to human health and the environment, with special risks to children. It is recognized that pesticides cause adverse health effects in humans such as cancer, neurological disruption, birth defects, genetic alteration, reproductive harm, immune system dysfunction, endocrine disruption and acute poisoning. Pests will be controlled to protect the health and safety of students and staff, maintain a productive learning environment and maintain the integrity of school buildings and grounds. Pesticides will not be used to control pests for aesthetic reasons alone. The safety and health of students, staff and the environment will be paramount.

Further, it is the goal of the District to provide for the safest and lowest risk approach to control pest problems while protecting people, the environment and property. The District's IPM Policy incorporates focusing on long-term prevention and will give non-chemical methods first consideration when selecting appropriate pest control techniques. The District will strive to ultimately eliminate the use of all chemical controls.

The "Precautionary Principle" is the long-term objective of the District. The principle recognizes that:

- a) no pesticide product is free from risk or threat to human health, and
- b) industrial producers should be required to prove that their pesticide products demonstrate an absence of the risks enumerated in paragraph two (2) rather than requiring that the government or the public prove that human health is being harmed.

This policy realizes that full implementation of the Precautionary Principle is not possible at this time and may not be for decades. But the District commits itself to full implementation as soon as verifiable scientific data enabling this becomes available.

## DECISION MAKING PROCESS

A Pest Management Team will serve to provide guidance and verification regarding procedures, program implementation, and will recommend resolutions for District policies that conflict with this policy. Decisions will be made by a simple majority of all Pest Management Team members voting at meetings. A quorum of ten (10) members must be present to convene a meeting. The Pest Management Team will be appointed within forty-five (45) calendar days of adoption of this policy. The first meeting of the Pest Management Team must be attended by all members and convened within thirty (30) calendar days of the Team's appointment. The Pest Management Team will decide the frequency of subsequent meetings.

The administration of this program will be conducted by a District-appointed IPM Coordinator. The IPM Coordinator will be an existing District staff position.

The Pest Management Team will be comprised of fifteen (15) independent members: one District non-management representative from Maintenance and Operations, one District representative from Environmental Health and Safety Branch, one District representative from Food Services, the District IPM Coordinator, one IPM expert, two parents of District-enrolled students, two community members, one public health representative, two environmental representatives, one District teacher, one District principal, and one medical practitioner.

The Board of Education's School Safety and Campus Environment Committee must approve all assignments to this Pest Management Team by a simple majority of all members. Selection of the initial Pest Management Team nominees will be the responsibility of groups whose members have participated in and attended at least two (2) of the Policy Development Committee meetings. Thereafter, nominations will be submitted to the Pest Management Team by the fifteen (15) named constituencies. Nominations to a particular slot must be made by a member of that slot's constituency. Pest Management Team membership will be solicited through the *Spotlight*, recognized parent and teachers organizations, unions, and notification and outreach to other independent community groups. Nominations will be screened by the Pest Management Team, then submitted to the School Safety and Campus Environmental Committee for approval at a public meeting.

Pest Management Team members will be randomly divided into two (2) classes of seven (7) and eight (8), comprised as closely as possible of equal numbers of District staff and non-District staff Pest Management Team member constituencies. The seats of the first class shall be vacated after the expiration of the second year; of the second class, at the expiration of the third year, so that approximately one-half may be chosen every year; and if vacancies happen by resignation of otherwise, the School Safety and Campus Environmental Committee may make appointments to fill the vacated seats consistent with the fifteen (15) constituency groups. With the exception of the first term of the second class, Pest Management Team terms will be two (2) years.

## **PRODUCT AND USE APPROVAL**

Product used at the District must be first approved by the Pest Management Team following a careful review of contents, precautions, and low risk methods. In the interim between adoption of this policy and establishment of the Pest Management Team, pest management product use and approval decisions will be made by the District IPM Coordinator in consultation with the independent IPM expert.

All purchasing of pesticides to be used on District sites or property will require the approval of the IPM Coordinator. Only persons specifically authorized by the IPM Coordinator are permitted to bring or apply pesticides on District sites or property; other site employees and non-employees are not permitted to bring or apply pesticides on District property.

Products will be divided into two classifications:

- 1) Products approved by the Pest Management Team by a simple majority of all members for use at the discretion of the pest control technician within the guidelines of this IPM program. This will be called the "Approved List." The Approved List will adhere to the "Pest Management Methods and Product Selection Guidelines" (see Appendix A).
- 2) Products not on the Approved List whose use requires the written approval of the IPM Coordinator and an independent IPM expert (approved by the Pest Management Team) when reduced risk methods are unsuccessful. Use of products not on the Approved List will be reported to and reviewed by the Pest Management Team on a case-by-case basis.

## **TRAINING**

Training of personnel is critical to the success of an IPM program (see Appendix B). All District personnel and contractors, including facilities personnel, principals, teachers, parents, students, and the public, have roles and responsibilities in carrying out this IPM program. Training documentation will be reported to the Pest Management Team.

## **METHOD OF IPM CONTROL**

The following is the preferred order in which pest management will be implemented:

1. Establish area pest management objectives, e.g., kitchens, playgrounds, classrooms, etc.
2. Establish pest threshold levels.
3. Initiate behavioral modification, including improved sanitation.
4. Utilize pest prevention methods, such as structural modification, and/or employ progressive non-chemical methods and techniques, including pest monitoring and trapping.
5. Employ reduced risk progressive pesticide selection as a last resort.



## **NOTIFICATION, RECORDKEEPING, AND REPORTING**

The District will notify parents, employees and students of all pesticide applications using the following guidelines:

1. The District will provide annual notification to parents or guardians in the "Registration Packet" distributed at the beginning of each school year or upon enrollment. Notification will include:
  - a) the IPM policy statement;
  - b) the Approved List;
  - c) the availability of IPM activity records in the main office of each school;
  - d) a request that parents or guardians notify the school principal if their child's health and/or behavior would be influenced by exposure to pesticide products; and
  - e) a mechanism by which parents or guardians can request notification of all pesticide applications.
2. The Approved List will be conspicuously posted annually in the main office of each site and remain posted throughout the year.
3. Applications of products not on the Approved List will be preceded by a 72-hour notification to parents or guardians, and school staff, except for emergencies as determined by the IPM coordinator and an independent IPM expert (approved by the Pest Management Team). Notification will include:
  - a) the product name and active ingredient;
  - b) the target pest;
  - c) the date of pesticide use;
  - d) the signal word indicating the toxicity category of the pesticide;
  - e) a contact for more information; and
  - f) the availability of further information at the school's main office.
4. Signs shall be conspicuously posted around any area where pesticides not on the Approved List are to be applied in a non-emergency situation at least 72-hours before and for five (5) half-lives after any pesticide application. In the event of an emergency as determined in number three (3) above, posting will go up at the time of the application. Signs shall include the information listed in number three (3) above.

## **IPM PROCEDURES MANUAL**

An IPM procedures manual will be written to implement this policy. This manual will be presented to the Pest Management Team for review and approval within nine (9) months after adoption of this policy.

## APPENDIX A

### Pest Management Methods and Product Selection Guidelines

- I. Pest management methods and product selection will be based on the following principles:
  - a) In embracing the Precautionary Principle, the District will use only those pest management methods or products demonstrated to be the safest and lowest risk to children, and strive to use products that demonstrate an absence of the following health effects: cancer, neurological disruption, birth defects, genetic alteration, reproductive harm, immune system dysfunction, endocrine disruption and acute poisoning.
  - b) In those instances where pesticide products fall outside of these specific guidelines, the District's decisions on pest management methods or product selection will conform to the spirit and intent of this policy and these guidelines.
  - c) The District will use only those pest management products that can be applied in a manner at a time where no person will inhale or come into direct contact with them, or be exposed to volatile agents.
  - d) The Approved List and categories in Section II will be reviewed and approved annually by the Pest Management Team.
  - e) A proposed time line for phaseout of products that will not qualify for the Approved List will be presented to the Pest Management Team for review and approval at their first meeting.
- II. Only pest management products that fall within the following categories will be placed on the Approved List:
  - insecticide or rodenticide baits and traps;
  - caulking agents and crack sealants;
  - borates, silicates, and diatomaceous earth;
  - soap-based products;
  - products on the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) 25(b) list [40 CFR 152.25(g)(1)] or the California Certified Organic Farmers organic list
  - cryogenics, electronic products, heat, and lights;
  - biological controls, such as parasites and predators;
  - microbial pesticides;
  - insect growth regulators;
  - physical barriers.

## IPM TRAINING SCHEDULE AND COSTS

## APPENDIX B

Activity	Training Time	Instruction (Class/Practical)	Current Participants	Instructional Costs		Ongoing Costs	
				Initial	Ongoing	Initial	Ongoing
M&O Personnel							
Pest Control Technicians	40 hrs.	Practical	22	880	350	\$28,923	\$14,460
Gardeners	40 hrs.	Practical	45	1,800	608	\$40,751	\$20,376
M&O Crafts (Plumbers, etc.)	2 hrs.	Lecture/Practical	1,421	2,842	1,000	\$71,862	\$35,931
Custodians (SUP-TTT Only)	4 hrs. - Initial 2 hrs. - Refresher	Lecture/Practical	2,162	4,324	1,240	\$119,672	\$59,836
Plant Managers	6 hrs. - Initial 4 hrs. - Cont'd Ed.	Lecture/Practical	555	5,550	3,450	\$89,154	\$44,577
Cafeteria Staff (SUP-TTT Only)	4 hrs. - Initial 2 hrs. - Refresher	Lecture/Practical	615	3,690	1,845	\$128,800	\$64,400
Instructional							
Principals/Administrators	30 minutes	Lecture/Handout	860	430	172	\$800	\$320
Teachers	15 minutes	Lecture/Handout	65,000	16,250	6,500	\$20,000	\$8,000
Students	0	Written Informative (1 page)	750,000			\$5,000	\$2,500
Community Outreach							
Parents (PTA)	30 minutes		27 Clusters			\$8,660	\$7,794

**TOTAL COST:****\$513,622      \$258,194**

- Notes: 1. Each class is billed at 8 hours (including expenses)  
 2. Ongoing training includes 1 additional initial class with 1 hour preparation for each instructional hour  
 3. Community outreach contract cost are billed at 4 hours/meeting (including expenses)  
 4. Instructional and community outreach programs include both costs of instruction and time spent in training for LAUSD classified participants

## APPENDIX C

**MAINTENANCE & OPERATIONS BRANCH  
1998-99 INTEGRATED PEST MANAGEMENT BUDGET**

1 Pest Management Specialist	\$ 52,487
14 Pest Control Technicians	608,260
6 Power Spray Operators	<u>252,353</u>
Salaries	\$ 913,100
Benefits	259,902
Supplies	<u>87,315</u>
<u>21</u>	\$ 1,260,317

**Gardening Budget Devoted to Weed Abatement**  
(Weed abatement time is estimated at 1/6 of Gardening time)

Salaries	\$ 104,186
Benefits	33,467
Supplies/Equipment	31,250
Dumping	<u>16,708</u>
	\$ 185,611

**TOTAL      \$ 1,445,928**

## APPENDIX C (CONTINUED)

**MAINTENANCE & OPERATIONS BRANCH  
PROPOSED ADDITIONS TO SUPPORT IPM POLICY IMPLEMENTATION**

**SANITATION**

Cleanliness of kitchens is one of the keys to an effective IPM policy. The IPM expert has identified cleanliness as a function where additional effort needs to be implemented. It is proposed that this be done through supplementing two functions currently in place, the Year-Round Cleaning Crews (centrally administered) and the Area Cleaning Crews (administered in each Maintenance and Operations Area.

- A. Year-Round schools currently have their kitchens thoroughly cleaned every other year. The following new positions and overtime funding would be added to provide deep cleaning of year-round kitchens twice a year.

	Salary and Benefits
1 Plant Manager IV	\$55,165
2 Senior Wall Washers	91,113
2 Window/Wall Washers	83,247
2 Building & Grounds Workers	59,678
Supplies	5,000
<b>TOTAL FOR TWO CREWS</b>	<b>\$294,203</b>

Overtime for existing Year-Round crews for deep cleaning of kitchens two Saturdays per month

2	Senior Wall Washers \$25 per hour, 384 hours annually = \$9,600
8	Wall Washers \$22.50 per hour, 1,152 hours annually = \$25,920
	Supplies \$4,000

**TOTAL ANNUALLY** **\$39,520**

- B. Traditional Calendar Schools currently have their kitchens thoroughly cleaned during the summer months. To increase the cleanliness of the kitchens, two crews will be provided per M&O Area to clean behind and under stoves and refrigerators as well as walls and stove hoods. Work will occur two Saturdays each month.

7	Senior Wall Washers	\$25 per hour for 1,344 hours annually = \$33,600
28	Wall/Window Washers	\$22.50 per hour for 4,032 hours annually = \$90,720
	Supplies	\$14,000

**TOTAL** **\$138,320**

## APPENDIX C (CONTINUED)

**MAINTENANCE & OPERATIONS BRANCH  
PROPOSED ADDITIONS TO SUPPORT IPM POLICY IMPLEMENTATION**

- C. Eight Exclusion Crews will be utilized to close openings and make kitchens and cafeterias inaccessible to pests. There will be one exclusion crew per M&O Area as a one-time cost for one year. One crew will be assigned to the IPM group to work at the call of the IPM expert.

		Salary and	
		Benefits	
8	Carpenters	\$358,720	Salaries
8	Maintenance Workers	225,400	Salaries
		186,651	Benefits
		60,000	Supplies
<b>TOTAL FOR 8 CREWS</b>		<b>\$830,771</b>	

**WEED ABATEMENT**

Since spraying of grounds will be discontinued under the IPM policy, an hour per week at each school will be needed for nonchemical weed abatement. Although the hours will be added to gardening crews current hours, the effect is to add 15 full time equivalent gardeners for 600 sites.

15	Gardeners	\$342,450	Salaries
		134,850	Benefits
		140,000	7 Trucks
		30,000	Supplies and Equipment
<b>TOTAL</b>		<b>\$647,300</b>	



## LIST OF NAMES AND ORGANIZATIONS

FIRST NAME	LAST NAME	ORGANIZATION
JIM	BARNARD	UCLA, PROFESSOR OF PHYSIOLOGY
TOM	BOXWELL	LAUSD, EHSB
WENDY	COHEN	PARENT
JULIE	CRUM	LAUSD, M&O
BILL	CURRIE	IPM INSTITUTE
DIANE	DOI	LAUSD, FOOD SERVICES
MARTHA	DOSTER	LAUSD, CHILD DEVELOPMENT DIVISION
HELEN	FALLON	PTA, 10 <sup>TH</sup> DISTRICT
MARTIN	GALINDO	LAUSD, SOUTH OPERATIONS ADMINISTRATOR
CHRISTINA	GRAVES	PESTICIDE WATCH
LYNDON	HAWKINS	CALIFORNIA DEPARTMENT OF PESTICIDE REGULATION
RICK	HENRY	LAUSD, M&O
WILLIAM	HICKS	LAUSD, M&O
MARLENE	ISARA	LAUSD, M&O
ANNE	JACKSON	ENVIRONMENTAL HEALTH ASSOCIATION
YI HWA	KIM	LAUSD, EHSB
DAVID	LERMA	LAUSD, LOCAL 99
DON	MOTLEY	LAUSD, FOOD SERVICES
KIRK	MURPHY	UCLA MEDICAL, PHYSICIANS FOR SOCIAL RESPONSIBILITY
YVONNE	NELSON	ACTION NOW
GARY	PONS	LAUSD, EHSB
ASHLEY	POSNER	PARENT
DEBBIE	RAPHAEL	CITY OF SANTA MONICA
SANDRA	SCHUBERT	LA SAFE SCHOOLS COALITION
ROBINA	SUWOL	LA SAFE SCHOOLS COALITION
HOLLY	TILSON	PTA, 10 <sup>TH</sup> DISTRICT
GAIL	VAN GORDON	LA COUNTY HEALTH DEPARTMENT
MARIA	WALE	LAUSD, VALLEY OPERATIONS ADMINISTRATOR
ANNIE	WATERMAN	ACTION NOW
JAY	WINTERS	UTLA

## APPENDIX D

### DEFINITIONS

TERM	DEFINITION
<b>ACTIVE INGREDIENT</b>	An ingredient in a pesticide that destroys, repels, mitigates, desiccates, defoliates, or retards the growth of a target pest or plant as defined in FIFRA (7 USC 136(a)).
<b>HALF-LIVES</b>	The amount of time during which the biological activity of a pesticide product decreases by one-half of its original concentration. Five half-lives reduce the biological activity of a pesticide product to 3.125% of its original concentration. Reduced concentration is a component of reduced risk.
<b>INDEPENDENT</b>	One who does not have a direct financial stake in the traditional pest control industry.
<b>INTEGRATED PEST MANAGEMENT</b>	<p>Integrated Pest Management (IPM) is the coordinated use of pest and environmental information with available pest management methods to prevent unacceptable levels of pest damage with least possible risk to human health and the environment, while remaining economically feasible. The goal of the IPM approach is to manage pests and the environment so as to protect human health and environmental quality. IPM systems utilize a high quantity and quality of technical information on the pest and its interaction with the environment (site). Because IPM programs apply a holistic approach to pest management decision-making, they take advantage of ALL low risk management options, emphasizing natural biological methods, and the appropriate use of selective pesticides as a last resort. IPM strategies incorporate environmental considerations by emphasizing pest management measures that minimize intrusion on natural bio-diversity ecosystems. Thus, IPM is:</p> <ul style="list-style-type: none"> <li>• A system utilizing multiple methods</li> <li>• A decision-making process</li> <li>• A risk reduction system</li> <li>• Information intensive</li> <li>• Biologically based</li> <li>• Cost effective</li> <li>• Site specific</li> </ul>
<b>IPM COORDINATOR</b>	An existing District position responsible for oversight and implementation of the District's IPM policy.
<b>PEST ACTION THRESHOLD</b>	A pest action threshold is a tolerance level determined by the sensitivities of the occupants and should reflect the pest management objective for the site. The presence of a pest does not, in itself, necessarily require pesticidal action. When pest populations exceed action thresholds, action will be taken. Precise recommendations or actions to achieve specific results are an essential part of the IPM program. Specific recommendations including an explanation of the benefits should be based on the evaluation of all available data obtained through monitoring.
<b>PESTICIDE</b>	(1) Any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant [FIFRA, 7 USC 136(u)]
<b>PEST MANAGEMENT OBJECTIVE</b>	A pest management objective is a road map for pest control that defines goals to be accomplished. The pest management objective is specific to the site's needs and considers the occupants, conditions, pest problems, and resources available.



## APPENDIX D

## DEFINITIONS CONTINUED

<b>PROGRESSIVE NONCHEMICAL METHODS AND TECHNIQUES</b>	Sanitation, exclusion, reduced temperature or increased temperature changes in plant health for turf and ornamentals, and physical lethal control measures such as snap traps, and the introduction of natural parasites, predators, or disease organisms are non-chemical methods and techniques. These approaches modify the habitat to reduce pest populations and minimize the role of chemical controls in pest management.																									
<b>REDUCED RISK PROGRESSIVE PESTICIDE SELECTION</b>	Selection of reduced risk products takes into consideration toxicity, volatility, longevity of the product, mode of application, placement of the material, effectiveness, and other physical characteristics of the product. Reduced risk products are essentially non-volatile, effective, relatively low toxicity products. Progressive selection requires the use of lowest-risk products first.																									
<b>SIGNAL WORD</b>	<p>All EPA-registered pesticides have a signal word on the label that indicates its toxicity. EPA-designated signal words include: Danger, Warning, and Caution. These signal words refer to the acute hazard of the product, not to the potential for long-term effects. Signal words are defined by the EPA as:</p> <table><tr><td>Danger</td><td>Highly Toxic</td></tr><tr><td>Warning</td><td>Very to Moderately Toxic</td></tr><tr><td>Caution</td><td>Minimally Toxic</td></tr></table>	Danger	Highly Toxic	Warning	Very to Moderately Toxic	Caution	Minimally Toxic																			
Danger	Highly Toxic																									
Warning	Very to Moderately Toxic																									
Caution	Minimally Toxic																									
<b>STRUCTURAL AND BEHAVIORAL MODIFICATION</b>	Non-pesticidal methods for managing pest populations, which includes modification of structures to exclude or eliminate life support for pests. Behavioral modifications are changes in the way students, staff, and District personnel take action such as removing trash and garbage at close of business, thorough cleaning actions, and not eating in classrooms.																									
<b>TOXICITY CATEGORY</b>	<p>The EPA uses the LD<sub>50</sub>* to rank pesticides into four toxicity categories. The most acutely toxic pesticides are in Category I and the least toxic in Category IV.</p> <p><i>*To measure acute toxicity, pesticides are fed to laboratory animals to see how much it takes to kill half of the test population. The result is the LD<sub>50</sub> – the lethal dose for 50% of the test population.</i></p> <p>The following demonstrates how the signal word relates to the toxicity category:</p> <table><tr><th>EPA Toxicity</th><th>Label Word</th><th>Signal Word</th><th>Fatal Dose in Humans</th><th>Oral LD<sub>50</sub> (mg/kg)</th></tr><tr><td>Category I</td><td>Highly Toxic</td><td>Danger</td><td>A few drops</td><td>&lt;50</td></tr><tr><td>Category II</td><td>Very Toxic</td><td>Warning</td><td>Up to one ounce</td><td>50 to 500</td></tr><tr><td>Category III</td><td>Moderately Toxic</td><td>Caution</td><td>Up to one pint</td><td>500 to 5,000</td></tr><tr><td>Category IV</td><td>Least Toxic</td><td>Caution</td><td>Up to one quart</td><td>&gt;5,000</td></tr></table>	EPA Toxicity	Label Word	Signal Word	Fatal Dose in Humans	Oral LD <sub>50</sub> (mg/kg)	Category I	Highly Toxic	Danger	A few drops	<50	Category II	Very Toxic	Warning	Up to one ounce	50 to 500	Category III	Moderately Toxic	Caution	Up to one pint	500 to 5,000	Category IV	Least Toxic	Caution	Up to one quart	>5,000
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**Office of the Inspector General  
Los Angeles Unified School District**

**Performance Audit of  
Integrated Pest Management Program**

**OA 22-1350**

**June 29, 2022**



## Los Angeles Unified School District Office of the Inspector General

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**Salvatore Randazzo**  
*Interim Inspector General*

**335**

June 29, 2022

Mr. Robert Laughton, Director  
Maintenance & Operations Division  
Los Angeles Unified School District  
333 S. Beaudry Ave., 22nd floor  
Los Angeles, CA 90017

### **RE: Integrated Pest Management Program**

Dear Mr. Laughton:

This is our Performance Audit report of Integrated Pest Management Program.

The objectives of the audit were to determine: (1) whether the District's Integrated Pest Management (IPM) Program was effective and functioning in compliance with the Healthy Schools Act to provide all students and staff a healthier, safe learning and work environment; (2) whether the District's IPM Team was operating in accordance with state and federal guidelines and District policy. The audit covered the period from July 1, 2020, through June 30, 2021.

We appreciate your continued support of our services.

Sincerely,

***Austin E. Onwualu***

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Austin E. Onwualu, CPA, CIG  
Deputy Inspector General, Audits

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Salvatore Randazzo  
Interim Inspector General

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## EXECUTIVE SUMMARY

We conducted an audit of the Los Angeles Unified School District (LAUSD or District) Integrated Pest Management (IPM) program. The objectives of the audit were to determine: (1) whether the District's Integrated Pest Management (IPM) Program was effective and functioning in compliance with the Healthy Schools Act<sup>1</sup> to provide all students and staff a healthier, safe learning and work environment, and (2) whether the District's IPM Team was operating in accordance with state and federal guidelines and District policy<sup>2</sup>. The audit covered the period from July 1, 2020, through June 30, 2021.

Our audit determined that the District's Integrated Pest Management program generally complied with the requirements of the Healthy Schools Act (HSA)<sup>1</sup>. We noted that an integrated pest management plan was on file, the District had an interim IPM Coordinator (until one could be permanently hired), Pest Technicians were visiting their assigned schools monthly, and routine services and internal controls were in place for the purchase, receipt, issuance, and control of pesticides and non-toxic pest supplies.

We visited seven (7) schools selected from each of the seven school Board Member districts together with the Newman Nutritional Center. We confirmed that District Pest Technicians were licensed by the State of California, parents received annual notification of potential pesticide application, and prior year annual pesticide usage reports at LAUSD sites were provided to the state. Also, the IPM oversight team was in place to approve the use of pesticides at District schools. We reviewed the IPM Team member process to determine whether the team was operating in accordance with documented procedures and the selection/approval of IPM oversight team members.

Our audit identified a few areas where improvements were needed. We provided the Pest Management Unit with three recommendations to comply with the HSA requirements and District policy. The details of our findings and recommendations are provided in the **Results of Audit** section of this report.

We conducted a Survey (through Survey Monkey) of a select group of elementary, middle, and senior high school Pest Technicians, Principals, Plant Managers and Cafeteria Managers representing all Board member districts. The goal of the Survey was to evaluate the effectiveness of the District's IPM program in controlling pests without the use of pesticides. The Survey included questions related to their familiarity with the state IPM mandate, the District's IPM policies and procedures, the Healthy Schools Act, their roles and responsibilities under the program and their evaluation of the effectiveness of the program at their respective school sites. In addition, we also sent a separate Survey questionnaire to the IPM Team members.

The Survey was sent out to 1,058 IPM participants (Pest Technicians, Principals, Plant Managers and Cafeteria Managers) from 361 selected elementary, middle and senior high schools. The Survey results are provided in **Exhibits A - F** of this report.

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<sup>1</sup> Healthy Schools Act; [https://www.cdpr.ca.gov/docs/pestmgt/pubs/hsa\\_factsheet.pdf](https://www.cdpr.ca.gov/docs/pestmgt/pubs/hsa_factsheet.pdf)

<sup>2</sup> LAUSD IPM Policy, Rev. 05/23/02; <https://www.laschools.org/employee/mo/ipm/docs/ipmpolicyretype.pdf#:~:text=Integrated Pest Management Program>

## **INTRODUCTION**

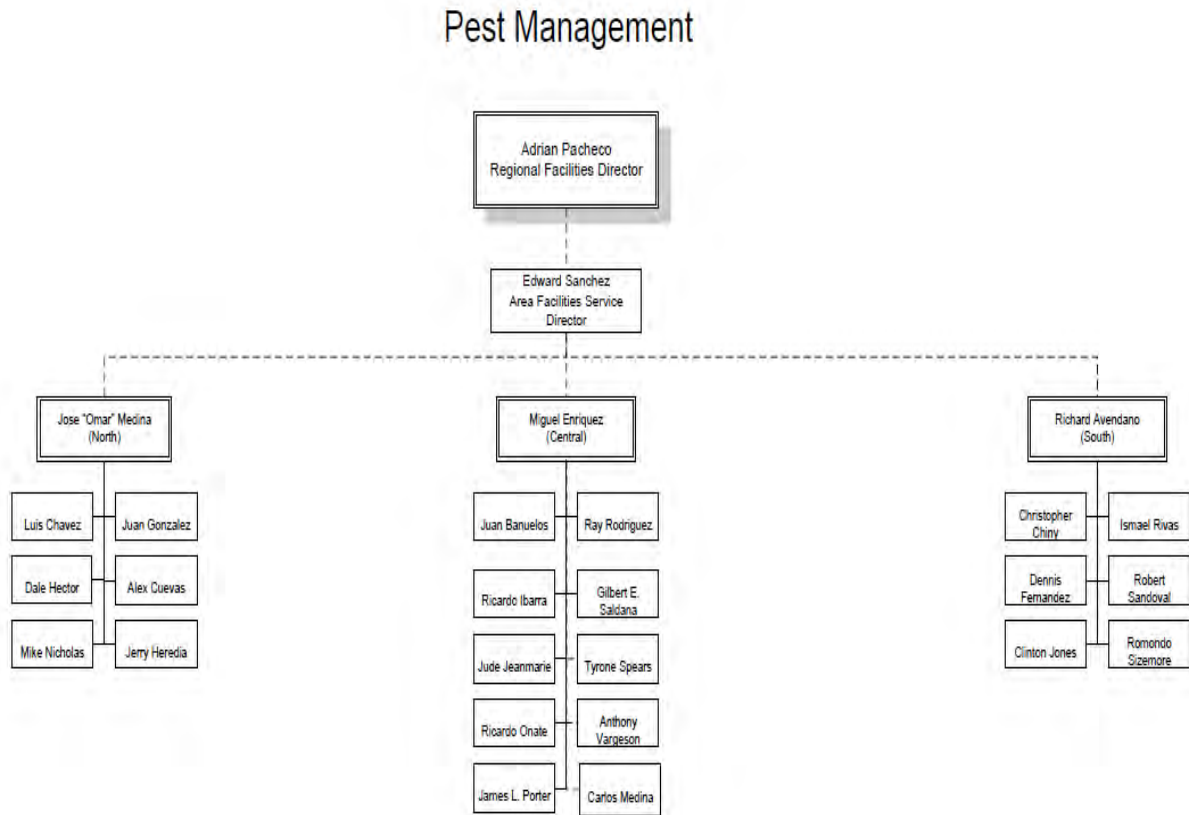
In March 1999, the Board of Education adopted a revised Integrated Pest Management (IPM) program. It is the policy of the Integrated Pest Management, (defined as the coordinated use of pest and environmental information with available pest management methods), to prevent unacceptable levels of pest damage by the most economical means and with the least possible exposure to people and the environment. The state enacted the California Healthy Schools Act (HSA) in 2000 to protect school children. The law requires public schools and childcare facilities to keep a record of pesticide use, notify parents about pesticide use and post warning signs when pesticides are applied. The law also favors safer, greener pest management techniques, known as integrated pest management over conventional pesticide-reliant treatments.

The California Healthy Schools Act has 7 requirements that all public schools and childcare facilities must adhere to: (i) select an IPM Coordinator, (ii) create an IPM Plan, (iii) provide annual HSA training to all participants, (iv) post warning signs in pesticide application areas, 24-72 hours in advance as applicable, (v) give participants an opportunity to register for notification prior to pesticide application, (vi) maintain records of pesticide applications, and (vii) submit annual pesticide use records to the State Department of Pest Regulation (DPR). The Pest Management Unit under the direction of the IPM Coordinator is responsible for ensuring that HSA requirements are met.

### **Pest Technicians**

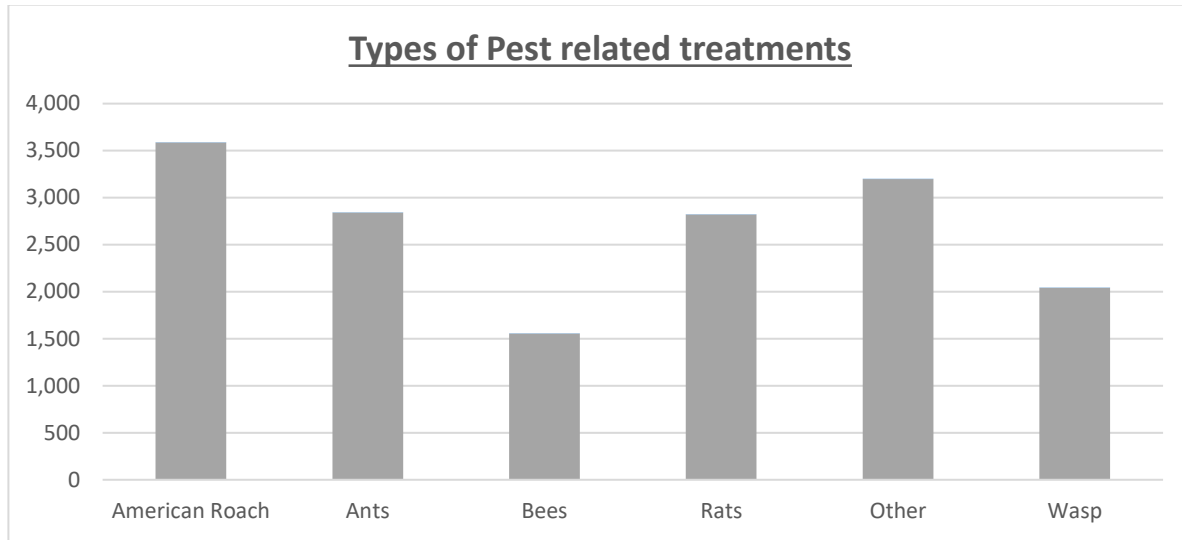
The Pest Management Unit provides pest management services to all school sites and facilities within the Los Angeles Unified School District. Pest Technicians are required to identify the various pest species within the District and to determine the necessary methods that can be used to both control the problem and conform to the guidelines of the District's IPM program.

The District's Pest Management Unit organization structure is as follows:



To further evaluate Pest Technicians' service effectiveness to the school District, we obtained and reviewed the Pest Management records from M&O for the period September 2017 through September 2021. The M&O Pest Management Unit received more than 18,000 service calls per year. Those service calls fall under the categories of: **Emergency** calls for situations that may cause immediate danger to students or staff members, **Urgent** calls for situations that may disrupt the learning environment in a classroom and **Routine** calls for situations that call for pest treatments that do not pose immediate threat to the safety of students and staff or that may cause major program disruption.

The records listed all the Pest Site Inspection Details recorded by the Pest Technicians after completing each inspection call. We noted that most of the pests treated were the American roach, ants, rats, wasp and bees. Others included mosquitos, pigeons, raccoons, fleas, mice etc. Based on the Pest Inspection Report and our school visits, we concluded that the Pest Management Unit provided satisfactory oversight of the IPM Program. The figure below shows the number of pest treatments performed from September 2017 through September 2021.



*Pest Treatments 9/2017 through 9/2021*

### **RESULTS OF AUDIT**

***Objective: To determine whether the District’s Integrated Pest Management (IPM) Plan was effective and functioning in compliance with the Healthy Schools Act to provide all students and staff a healthier, safe learning and work environment.***

We determined that the Pest Management Unit generally complied with the Healthy Schools Act requirements for Pest Control. However, our audit identified areas where improvements were needed including training for stakeholders on IPM procedures; and giving school participants the opportunity to register for advance notification of pesticide applications not included in the annual notice. Our audit noted the following:

#### **(i) Compliance with HSA Requirements**

IPM did not fully comply with the HSA requirements. Per the requirements of the Healthy Schools Act, the M&O Branch - Pest Management Unit was responsible for providing IPM program education to IPM participants. Additionally, schools were required to set-up a notification registry for all parents, guardians, and staff who required advance notice of special pesticide treatments at their school sites.

Our interviews and surveys conducted among IPM school participants, revealed the following:

- 55 School Principals (76%) stated that they did not receive lectures and brochures on IPM from M&O Pest Management Unit on a consistent basis.
- 110 Plant Managers (51%) stated that they had not received the initial 6-hour training and/or the 4-hour annual Refresher IPM Training Course.
- 122 Cafeteria Managers (53%) stated that they had not received any initial and/or an annual refresher IPM training course.



- 64 School Principals (89%) stated that the community through the PTA had not received any IPM lecture or training.
- 4 IPM Team Members (21%) stated that they had not received any training in IPM procedures with respect to their assigned roles.
- 5 Pest Technicians (26%) stated that they had not received the initial training or the annual refresher IPM training.
- All Pest Technicians surveyed were licensed by the State of California Structural Pest Control Board (SPCB) and/or the State Department of Pesticide Regulations (DPR). A review of the State websites indicated that all licenses were current and free of customer complaints

Additionally, we asked the school Principals if the schools maintained a list of individuals who wanted to be notified when pesticides were used at the school, 36 Principals (50%) who responded to the Survey answered no.

The above conditions occurred because there were no formal procedures in place for educating and training IPM participants. In addition, there was no oversight process in place by the Pest Management Team to monitor for non-compliance with IPM requirements.

As a result, all participants were not aware of their roles and responsibilities for the IPM program and may not have complied with HSA requirements. The conditions noted increased the probability that the students and staff may have been at risk of exposure to hazardous substances due to lack of advance notice of pesticide usage.

**Recommendation 1:** We recommend the following: (i) The IPM Coordinator should develop a formal training program for each stakeholder based on their roles and responsibilities, and (ii) periodically remind IPM participants of the IPM information/training opportunities that are available on the M&O website

***Maintenance and Operations Division Response:*** The Maintenance and Operations Division agreed with this recommendation and stated that appropriate and consistent trainings and reminders will be implemented and utilized by January 1, 2023.

**Recommendation 2:** We recommend that the IPM Coordinator, establish a process to review school documents to help ensure that they were complying with HSA requirements.

***Maintenance & Operations Division Response:*** The Maintenance and Operations Division agreed with this recommendation and stated that appropriate and consistent processes will be implemented and utilized across all schools by January 1, 2023

***Objective: To determine whether the District's IPM Team was operating in accordance with state and federal guidelines and District policy<sup>3</sup>.***

**(ii) Documentation to Support IPM Policy Changes**

The District's revised ***IPM Policy, dated 05/23/2002*** and ***IPM Procedures Manual<sup>3</sup>, dated October 2000*** state the following: (i) the Board of Education's School Safety and Campus Environment Committee must approve all assignments to the District's Pest Management Team; (ii) IPM Team members must immediately fill team vacancies; (iii) the term limit for IPM team members is 2 years; and (iv) the IPM policy procedures manual would be updated and approved within 9 months after the 05/23/2002 date of the revised policy.

The IPM Procedures Manual also states that: *"the Pest Management Team (IPM Team) will provide guidance regarding procedures, program implementation, and will recommend resolutions when the IPM policy conflicts with other District policies...a quorum of ten members is required to convene a meeting...the Board of Education's Facilities Committee must approve all assignments to the Team...the Team term is two years."*

To assess the level of participation of the individual IPM Team members, we obtained various records from their regular meetings such as sign-in sheets, minutes of meetings, and other available documents. In addition, we requested the Pest Management Unit to provide copies of the confirmation of the IPM Team members by the Board of Education. One of the primary duties of the team was to approve products for routine use by the District. Product approvals require a quorum vote of 10 members.

As a result of our assessment, we noted the following conditions:

- No documentation was on file to support the assignment and approval of the current elected IPM Team members.
- The team does not have a permanent IPM Coordinator due to the retirement of the prior Coordinator. An interim Coordinator has been assigned.
- ***Changes were made to the established IPM policies and procedures without proper documentation and approval of the Pest Management unit. One of the changes made was the extension of term limits from 2 years to unlimited.***
- ***Many of the current team members have been in their present position longer than the two-year term limit.***
- One Team member assignment (Parent) was vacant and had been vacant for over a year.
- The IPM policy manual has not been updated in accordance with the revised policy change memo dated 05/23/2002.
- The Policy and Procedures manual is not clear as to whether an IPM team member can serve in one category and then serve under another category after their term expires.

Details of IPM Team Member Survey results are shown in **Exhibit E** of this report.

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<sup>3</sup> [ipm-procedures-manual.pdf\(laschools.org\)](http://ipm-procedures-manual.pdf(laschools.org))  
Integrated Pest Management Program

**Recommendations 3:** We recommend that the IPM Procedures manual be updated and include the following:

- Current changes in federal and state IPM regulations, if applicable.
- Clarification as to whether assigned team members can serve in another team assignment after their initial term has expired.
- Term limits for team members not exceeding 3 – 5 years. Limits should be established and strictly enforced.
- Specific guidelines on how open positions will be recruited for to help ensure that vacancies are filled in a timely manner.
- Specific procedures for the selection and approval of IPM Team members. Final approval of Team members should be the responsibility of a separate committee assigned by the District or by M&O, Pest Management Unit Senior Managers.

***Maintenance & Operations Division Response:*** Maintenance and Operations Division agreed with these recommendations and will implement these recommendations by January 1, 2023.

### **Pesticide and Non-toxic Pest Supplies**

We obtained available records related to the recording and tracking of pesticide and pest management supplies inventory for the period July 1, 2020, through June 30, 2021. We also interviewed the M&O Stores Warehouse (C3) Head Stock Clerk to determine if controls were in place over the inventory process of all pest-related supplies.

We noted that:

- Adequate procedures were in place at the District for the purchasing, receiving, storage and control of pest control inventory.
- M&O had developed a flow chart that outlined the inventory process by department for the purchase and approval of inventory, the receipt of goods in the warehouse, the recording of the merchandise to the financial system and the taking of semi and annual inventory.
- Supplies on hand were monitored and recorded. The replenishment of pesticide and pest supplies was based on usage and available inventory.
- Standard procedures were in place for documenting, recording and monitoring of pest control products and supplies purchases and requisitions.

## Pictures of Stores Warehouse Pesticides and Nontoxic Pest Control Supplies & Pesticides Controlled Storage



### **School Visits and Newman Nutritional Center**

To determine the effectiveness of the Pest Technicians school site visits, record keeping, notification and compliance with the school IPM preventive maintenance guidelines, we visited seven (7) schools from each of the seven School Board Districts and the Newman Nutritional Center.

- We obtained and reviewed the IPM logbooks to ensure the Pest Technicians logged in each time they serviced the school, and the details matched the Pest Site Inspection Details
- We used the District adopted IPM School Tool Kit Checklist to interview both the Plant Managers and the Cafeteria Managers to ensure that they were aware of the District IPM program and the Pest Technicians duties in addressing pest problems at their respective schools.
- We verified that the Plant Managers and the Cafeteria Managers received the Pest Site Inspection Details describing the work performed, findings and corrective actions taken, if applicable.
- We inspected the custodial and hopper rooms to ensure proper storage of cleaning supplies and equipment, making sure that cleaning and disinfecting products were stored in secure areas inaccessible to children.
- We visited the Newman Nutritional Center and noted that the Pest Technicians placed pest traps and treated the facility more frequently. Pest traps were placed in various corners, food storage and food preparation areas.

Based on our visits to the schools and the Newman Nutritional Center, we concluded that Pest Technicians serviced the schools on a monthly basis and responded timely when needed. The school facilities were treated with non-toxic chemicals when such treatments were applicable. We noted placement of pest traps in various kitchen areas and hopper rooms. We also noted that the Newman Nutritional Center was treated more frequently, and pest traps were strategically placed in various areas of the facility. Shown below are some pictures taken during our visits:





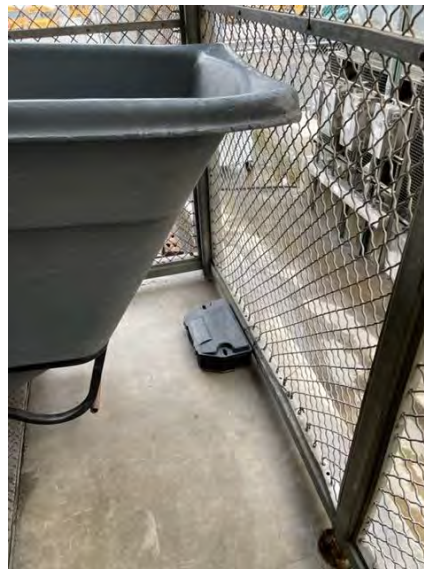
*Newman Nutrition Center*



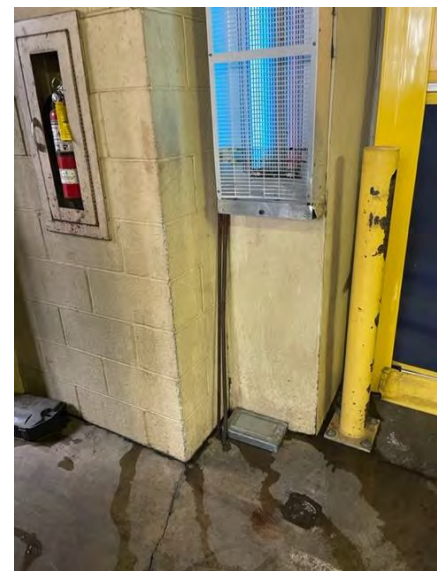
*Pest Trap @ NNC*



*Storage Room*



*Pest Trap*



*Pest Trap*



*Kitchen Storage Shelves*



*Kitchen Sink w/pipes, disposal conduits and drain fittings*

*At Huntington Park High School*



*Pest Trap located behind hot water tank in the Cafeteria Kitchen @ 135<sup>th</sup> Elementary School*



*Cafeteria Area at Annandale Elementary*





*Trash bins at Annandale Elementary*



*Kitchen storage area at Edward Roybal Learning Center*



*Outdoor eating area at Edward Roybal Learning Center*

### **AUDIT TEAM**

This audit was conducted by the Office of the Inspector General's Audit Team:

Jas Ahmed, Audit Manager  
 Silas Awujo, Principal Auditor  
 Valerie Logan, Senior Auditor



## APPENDIX A

### SCOPE AND OBJECTIVE

The objectives of the audit were to determine: (1) whether the District's Integrated Pest Management (IPM) Program was effective and functioning in compliance with the Healthy Schools Act<sup>4</sup> to provide all students and staff a healthier, safe learning and work environment, and (2) whether the District's IPM Team was operating in accordance with state and federal guidelines and District policy<sup>5</sup>. The audit covered the period from July 1, 2020, through June 30, 2021.

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards (GAGAS)*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The audit covered the period from July 1, 2020 through June 30, 2021.

### METHODOLOGY

To accomplish our audit objectives, we performed certain procedures, which included but not limited to the following:

- Reviewed federal and state laws and regulations for integrated pest management practices as well as the District's IPM policies and procedures.
- Conducted field visits to selected schools and the Newman Nutrition Center.
- Discussed the overall IPM process for schools and other facilities with the District's IPM Interim Coordinator.
- Interviewed personnel from Maintenance and operations Division, senior pest managers, pest technicians, M&O storage warehouse, head stock clerk, and school IPM participants.
- Developed and distributed internal control questionnaire to selected IPM school participants (Pest Technicians, Principals, Plant Managers and Cafeteria Managers).
- Reviewed pesticide purchases, receipts, issuance, usage, storage and inventory process controls including the annual physical inventory counts.
- Reviewed documents for compliance with DPR annual reporting requirements.
- Confirmed that Pest Technicians had current licenses issued by the State of California Structural Pest Control Board (SPCB) and/or the Department of Pesticides Regulations (DPR) and that they received appropriate pest management training.
- Sent out Survey questionnaire to School Principals, Pest Technicians, Plant Managers, Cafeteria Managers and the IPM Committee members.

<sup>4</sup> Healthy Schools Act; [https://www.cdpr.ca.gov/docs/pestmgmt/pubs/hsa\\_factsheet.pdf](https://www.cdpr.ca.gov/docs/pestmgmt/pubs/hsa_factsheet.pdf)

<sup>5</sup> LAUSD IPM Policy, Rev. 05/23/02; <https://www.laschools.org/employee/mo/ipm/docs/ipmpolicyretype.pdf#:~:text=Integrated Pest Management Program>

### EVALUATION OF INTERNAL CONTROLS

In accordance with *Government Auditing Standards*, we obtained an understanding of internal control that is significant within the context of the audit objectives. We assessed whether internal controls were properly designed and implemented. For those controls that were deemed significant, we obtained sufficient, appropriate evidence to support our assessment about the effectiveness of those controls.

We are required to report deficiencies in internal controls that are significant within the context of the audit objectives. A deficiency in internal controls exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct (i) impairments of effectiveness or efficiency of operations, (ii) misstatements in financial or performance information; or (iii) noncompliance with provisions of laws, regulations, contracts, or grant agreements on a timely basis. Based on our audit, we did not find any deficiencies in internal controls, however, certain control activities and processes could be strengthened and improved, details of which are provided in the **Results of Audit** section of this report.

**EXHIBIT A****SURVEY RESULTS – PEST TECHNICIANS***Total respondents: 19*

<b>IPM School Participants Survey Pest Technicians Survey Results</b>						
<b>Key Areas</b>	<b>Yes</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>Not Sure</b>	<b>%</b>
<i>Current State License issued by SPCB or DPR</i>	19	100	0	0	0	0
<i>Pest Technicians received an initial 40-hour training on pest management.</i>	6	32	5	26	8	42
<i>M&amp;O provided the Plant Managers a four-hour annual refresher course in IPM.</i>	6	32	10	53	3	15
<i>Performed monthly pest inspection at school Cafeterias</i>	19	100	0	0	0	0
<i>Aware of sign posting/location (48 &amp; 72 hrs.) requirements prior to pesticide treatment.</i>	15	79	2	10.5	2	10.5
<i>Monitored IPM books at schools to ensure they were up to date.</i>	15	79	4	21	0	0
<i>Able to obtain pest supplies/pesticides without Supervisor approval.</i>	1	5	17	90	1	5
<i>Had written copy of procedures issued by Pest Unit to acquire, use, and record pesticide supplies.</i>	12	63	3	16	4	21
<i>Had copy of the District's approved product list for pesticides.</i>	18	95	1	5	0	0

**Verbatim Comments from Pest Technicians**

Pest Technicians were asked to comment on specific areas that they thought the District's IPM Oversight Team and Sr. Management could improve on to better help them to control pests at District schools. Verbatim comments received were as follows:

- “Have more flexibility with materials approved. Maybe create a way to contact them directly and have them respond in a timely manner. I have been working for the District

for 6 years and have never been contacted by IPM team. It appears the IPM team is set in their ways, and it is easier to dismiss new products than to try and investigate and see if new products might meet approval.”

- “The IPM committee will withdraw effective chemical without provocation. As soon as it is found to be effective, they take it away.”
- “There doesn't seem to be a working knowledge of pest control within the governing group.”
- “Lot of new products that are safe and effective should be considered and approved.”
- “Allow us to use our already approved materials to control pest populations, such as gopher baits and environmentally safe, but EFFECTIVE rodenticides with significant efficacy! That would help! Also, our Spider protocol needs to go! Spider webs, need to be treated not just cleaned!”
- “At this time, we do not have enough manpower to implement a better pest management program.
- “Eliminate the IPM Committee. IPM is not the elimination of pesticides but the IPM committee is that way. Products we are allowed to use may not be effective.”
- “Dissolve the existing committee that has been serving for the past 20 years and create a new IPM committee with new members.”
- “They restrict us to supplies and chemicals that are the least effective. Why are we leaning on these people who are not licensed by the state, have NO pest control experience, and yet they handcuff us to what they decide or what they think is best.”
- “If we had better support from the IPM committee, IPM coordinator and Senior Pest manager in regard to having a broader approved pesticide list, which would be very helpful.”

## EXHIBIT B

**SURVEY RESULTS – SCHOOL PRINCIPALS***Total respondents: 72*

<b>IPM School Participants Survey School Principals Survey Results</b>						
<b>Key Areas</b>	<b>Yes</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>Not Sure</b>	<b>%</b>
<i>Aware of federal and state laws mandating that the schools adopt an IPM program</i>	63	87	9	13	0	0
<i>Aware of the District IPM Program</i>	55	76	17	24	0	0
<i>Aware of the roles and responsibilities as an IPM participant</i>	40	56	32	44	0	0
<i>List of Parent Notifications are maintained on file (*)</i>	36	50	36	50	0	0
<i>Maintained a list of parents who requested notification of pesticide usage at schools</i>	38	53	34	47	0	0
<i>Students are given awareness training on IPM (*)</i>	20	28	52	72	0	0
<i>Principals received from M&amp;O lectures and brochures on IPM</i>	17	24	55	76	0	0
<i>The community through the PTA are provided with awareness training on IPM (*)</i>	8	11	64	89	0	0
<i>Current "Approved Product List" on file and available at school sites</i>	68	94	4	6	0	0

**Verbatim Comments from School Principals**

School Principals were asked to comment on specific areas that they thought the District's IPM Oversight Team and Sr. Management could improve on to better help them to control pests at District schools. Verbatim comments received were as follows:

**Positive comments**

- “Overall, pest control has been very supportive.”
- “Our pest technician is amazing and always keeps the Plant Manager and I informed regarding school issues.”
- “We have an issue, make a call, same person comes, and issue goes away.”

Needed to Improve

- “We have had an ant issue for years. Pest Technician and Plant Manager both informed me that nothing can be done, but the use of baits that still does not take care of the issue. Students go home with bites.”
- “Rats still roam our campus.”
- “We have had a mosquito problem for some time—parents have complained. Three additional respondents have complained about the mosquito problem.”

## EXHIBIT C

**SURVEY RESULTS – SCHOOL PLANT MANAGERS***Total respondents: 217*

<b>Key Areas</b>	<b>Yes</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>Not Sure</b>	<b>%</b>
<b>Aware of federal and state laws for IPM Program</b>	167	77	35	16	0	0
<i>Aware of the District IPM Program</i>	189	87	13	6	0	0
<i>Aware of the roles and responsibilities as a IPM participant</i>	181	83	21	10	0	0
<i>An alternate is designated to manage pest related issues who is trained.</i>	104	48	96	44	0	0
<i>Plant Managers received an initial six-hour training on pest management.</i>	90	41	110	51	0	0
<i>M&amp;O provided the Plant Managers a four-hour annual refresher course in IPM.</i>	91	42	109	50	0	0
<i>Kept a log of pest sightings at school sites.</i>	132	61	66	30	0	0
<i>Maintained record of service calls.</i>	187	86	11	5	0	0
<i>Are school staff allowed to bring their own pesticide spray to school.</i>	1	<1	216	>99	2	1
<i>Pest Technician communicates pest problems, and recommendations on correction, if any, after each visit.</i>	146	67	9	4	0	0

NOTE: All Respondents did not reply to all questions in the Survey.

**Verbatim Comments from Plant Managers**

Plant Managers were asked to comment on specific areas that they thought the District's IPM Oversight Team and Sr. Management could improve on to better help them to control pests at District schools. Verbatim comments received are as follows:

**Positive comments**

- "I believe the district's IPM team is a great resource to have at our disposal."
- "Pest management does an excellent job in my school"

- “We have an excellent communication with the pest management team.

**Needed to Improve**

- “Provide training and overview every year of what the IPM program is and to follow it at every school site.”
- “Have big problem with cats and fleas”
- “Let technicians use safe chemicals or techniques that will get rid of pest. It is hard to win the battle with no AMMO.”

**The top 5 pests identified inside and outside of schools (as reported by Plant Managers):**

<b><u>Location</u></b>	<b><u>Pest Type</u></b>	<b><u>Survey Count</u></b>	<b><u>Percent</u></b>
<b>Inside</b>	Ants	122	56
Inside	Cockroaches	89	41
Inside	Rodents	79	36
Inside	Termites	72	33
Inside	Other*	46	21
<b>Outside</b>	Ants	96	44
Outside	Bees	74	34
Outside	Rodents	47	22
Outside	Cockroaches	46	21
Outside	Other*	52	24

\*Crickets, flies and bees



## EXHIBIT D

**SURVEY RESULTS – SCHOOL CAFETERIA MANAGERS***Total respondents: 227*

<b>Key Areas</b>	<b>Yes</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>Not Sure</b>	<b>%</b>
<b>Aware of federal and state laws for IPM Program</b>	138	61	32	14	0	0
<i>Aware of the District IPM Program</i>	130	57	40	18	0	0
<i>Aware of the roles and responsibilities as a IPM participant</i>	126	56	44	19	0	0
<i>An alternate was designated to oversee pest related issues.</i>	120	53	45	20	0	0
<i>Cafeteria Managers received an initial six-hour training on pest management.</i>	42	19	121	53	0	0
<i>M&amp;O provided the Cafeteria Managers a two-hour annual refresher course in IPM.</i>	29	13	117	52	0	0
<i>Kept a record of pest sighting logs at school sites.</i>	122	54	38	17	0	0
<i>Maintained kitchen inspection/sanitation reports completed by the Pest Technician.</i>	128	56	32	14	0	0
<i>Pest Technician communicated pest problems, and recommendations on correction, if any, after each visit.</i>	113	50	15	6	0	0

**Verbatim Comments from Cafeteria Managers**

Cafeteria Managers were asked to comment on specific areas that they thought the District’s IPM Oversight Team and Sr. Management could improve on to better help them to control pests at District schools. Verbatim comments received are as follows:

**Positive comments**

- “I believe that the district’s Pest Management team is a great resource to have at our disposal.”
- “Pest Management does an excellent job in my school”
- “The IPM Team has been very efficient with their inspections and when called upon.”

**Needed to Improve**

- “The cafeteria is kept free of evidence of pest activity, but classrooms have roaches, ants, and vermin.”
- “Quick access to monthly reports.”
- “There is only one guy who manages gophers for about 30 schools. It would be more efficient if all pest technicians did this not just one.”

**The top 5 pests identified (as reported by Cafeteria Managers):**

<b>Pest Type</b>	<b>Survey Count</b>	<b>Percent</b>
Ants	97	43
Cockroaches	50	22
Rodents	79	35
Spiders	35	15
Rodents	22	10
Other*	38	17

\*crickets, flies and bees

## EXHIBIT E

IPM Team Members Survey Results							
Key Areas	Yes	%	No	%	Not Sure	%	Total
<i>Aware of federal and state laws regarding school IPM programs.</i>	13	100	0	0	0	0	13
<i>Aware of the District IPM Program</i>	13	100	0	0	0	0	13
<i>Aware of the roles and responsibilities as a IPM participant</i>	13	100	0	0	0	0	13
<i>Served in other roles on the IPM Team in prior years.</i>	1	8	12	92	0	0	13
<i>Had regular IPM Team Meeting.</i>	13	100	0	0	0	0	13
<i>Sign-in sheet were used to record IPM Team Meeting.</i>	11	84	1	8	1	8	13
<i>IPM Team members had received training related to assigned role.</i>	9	69	4	31	0	0	13
<i>Used metrics/standards in evaluating the effectiveness of the district IPM program.</i>	9	69	4	31	0	0	13
<i>Regularly received meeting minutes after each session.</i>	10	77	3	23	0	0	13

## EXHIBIT F

**IPM Program Evaluation**

To determine whether the IMP program had improved over the last three to five years as of our audit date. We asked the Survey respondents whether they agreed with the following statements: (i) The program improved compared to 3 – 5 years ago.; (ii) The District IPM program was effective.; and (iii) The Pest Technicians serving their schools provided efficient and timely service. The results are noted below:

<b>Consolidated Response from School IPM Participants</b>							
<b>IPM School Participants</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neutral</b>	<b>Disagree</b>	<b>Strongly Disagree</b>	<b>Not Applicable</b>	<b>Total</b>
<b><i>Do you agree that <u>Pest Infestation Has Improved</u> Compared to 3 or 5 years ago?</i></b>							
Principals	12 (17%)	18 (25%)	29 (40%)	9 (13%)	4 (6%)	0 (0%)	72
Plant Managers	46 (22%)	89 (42%)	62 (30%)	8 (4%)	5 (2%)	0 (0%)	210
Cafeteria Managers	63 (41%)	54 (35%)	30 (19%)	3 (2%)	4 (3%)	0 (0%)	154
	<b>121 (27%)</b>	<b>161 (37%)</b>	<b>121 (28%)</b>	<b>20 (4%)</b>	<b>13 (3%)</b>	<b>0 (0%)</b>	<b>436</b>
<b><i>Do you agree that the District has an effective IPM Program at the school site?</i></b>							
Principals	9 (13%)	28 (39%)	23 (32%)	10 (14%)	2 (3%)	0 (0%)	72
Plant Managers	53 (25%)	98 (49%)	51 (24%)	5 (2%)	3 (1%)	0 (0%)	210
Cafeteria Managers	56 (36%)	71 (46%)	22 (14%)	3 (2%)	2 (1%)	0 (0%)	154
	<b>118 (27%)</b>	<b>197 (45%)</b>	<b>96 (22%)</b>	<b>18 (4%)</b>	<b>7 (2%)</b>	<b>0 (0%)</b>	<b>436</b>
<b><i>Do you agree that the Pest Technicians provided an efficient and timely service?</i></b>							
Principals	6 (8%)	25 (35%)	25 (35%)	4 (6%)	12 (17%)	0 (0%)	72
Plant Managers	34 (16%)	84 (40%)	33 (16%)	10 (5%)	49 (23%)	0 (0%)	210
Cafeteria Managers	15 (10%)	56 (36%)	17 (11%)	9 (6%)	57 (37%)	0 (0%)	154
	<b>55 (13%)</b>	<b>165 (38%)</b>	<b>75 (17%)</b>	<b>23 (5%)</b>	<b>118 (27%)</b>	<b>0 (0%)</b>	<b>436</b>



**LOS ANGELES UNIFIED SCHOOL DISTRICT**  
*Maintenance and Operations*

**TO:** Austin Onwualu  
 Deputy Inspector General

**DATE:** June 15, 2022

**FROM:** Robert Laughton, Director  
 Maintenance and Operations

**SUBJECT: Maintenance and Operations Responses to the Office of the Inspector General's Draft Report of Integrated Pest Management**

Please find below Maintenance and Operations responses to the Office of the Inspector General's Draft report of Integrated Pest management Program Audit Report.

**Recommendation 1:**

We recommend the following: (i) The IPM Coordinator should develop a formal training program for each stakeholder based on their roles and responsibilities, and (ii) periodically remind IPM participants of the IPM information/training opportunities that are available on the M&O website.

**Maintenance and Operations Response to Recommendation 1:**

Maintenance and Operations agrees with this recommendation. Appropriate and consistent trainings and reminders will be implemented and utilized by January 1, 2023.

**Recommendation 2:**

We recommend that the IPM Coordinator, establish a process to review school documents to help ensure that they were complying with HSA requirements.

**Maintenance and Operations Response to Recommendation 2:**

Maintenance and Operations agrees with this recommendation. Appropriate and consistent processes will be implemented and utilized across all schools January 1, 2023.

**Recommendation 3:**

We recommend that the IPM Procedures manual be updated and include the following:

- Current changes in federal and state IPM regulations, if applicable.
- Clarification as to whether assigned team members can serve in another team assignment after their initial term has expired.
- Term limits for team members not exceeding 3 – 5 years. Limits should be established and strictly enforced.
- Specific guidelines on how open positions will be recruited for to help ensure that vacancies are filled in a timely manner.



## LOS ANGELES UNIFIED SCHOOL DISTRICT

### *Maintenance and Operations*

- Specific procedures for the selection and approval of IPM Team members. Final approval of Team members should be the responsibility of a separate committee assigned by the District or by M&O, Pest Management Unit Senior Managers.

Maintenance and Operations Response to Recommendation 3:

Maintenance and Operations agrees with these recommendations and will implement these recommendations by January 1, 2023.

C: Mark Hovatter  
Krisztina Tokes  
Kathryn Butler  
India Griffin  
Ambition Padi  
Katharine Monishi  
Armando Ng  
Derek Kim

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### **Fraud, Waste and Abuse Hotline**

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