



Date: February 20, 2025
To: House Education Committee
From: Morgan Allen, COSA
Subject: House Bill 2684 - Integrated Pest Management

Chair Neron, Vice Chairs Dobson and McIntire, and Members of the House Education Committee

For the record, my name is Morgan Allen with the Coalition of Oregon School Administrators. Our membership organization represents 3,000 administrators who are school principals, central office administrators, and superintendents.

Feedback on HB 2684 Requirements

From our perspective there are three new requirements in the bill related to Integrated Pest Management that we'd like to provide comment on.

The first issue is the addition of school gardens to the grounds to be called out specifically in the Integrated Pest Management plan. While they may already be covered under the statute, that is a reasonable addition to the plan and we are willing to support that change.

The second issue is the requirement to update the IPM plan at least once every 5 years and to post it on the district website. These are not current requirements of the IPM law. We can be supportive of the 5 year review/revision period, but want to make sure we are not requiring multiple postings.

In 2017, the legislature passed Senate Bill 1062, which requires every school district, ESD , and charter school to develop a Healthy and Safe Schools Plan.

- Those plans cover such hazards as lead in water, radon testing, lead paint, asbestos, and carbon monoxide detection. Schools are also required to submit their IPM plan to ODE as part of the law, and to post it to their website.
- The HASS plans also require a working link to all of the plans, including the IPM plan, and they must list the staff member who is the designated IPM coordinator.
- Schools are required to certify annually to ODE that they are meeting all of the



requirements of the HASS plan.

Rather than require that the IPM plan also be on the district website separately, we believe that ODE should enforce the current requirements related to HASS and make sure all districts are in compliance.

The third issue is a bit more complex - the requirement that districts update and post their "low-impact" pesticide list to their website.

While not an expert on this topic, my understanding is that there is no official state agency or regulatory body that is tasked with publishing and maintaining a formal or recognized "low-impact" pesticide list. The folks that support the IPM work at the Oregon State University School IPM program have done their best to interpret the statute and publish a list that districts can refer to, but my understanding is that there is still no formal list.

Rather than tasking all 197 districts, 19 ESDs, and more than 100 charter schools with creating their own low-impact list, reviewing it for compliance regularly, requiring their governing board to adopt, and posting on their website, we suggest a better path is to direct the appropriate state regulatory agency with creating and maintaining the official low impact pesticide list, updating it regularly, making it available to schools, & requiring schools to integrate it into their IPM plan.

While we support parts of the bill, and the intent to keep students, staff, parents, and community members safe, we think the bill needs some work and we are ready to roll up our sleeves and collaborate with the proponents of the legislation to achieve that goal in the most effective and efficient way possible.