

## **Middleton-Cross Plains Area School District**

### **Administrative Policy Management Plan**

**6-25-2012 / Updated 4-23-2019**

#### **Policy**

The District is committed to providing a healthy and productive environment for all persons using the schools. In light of the risks that may be posed by certain conditions and activities in school buildings, the District has decided to implement specific policies and procedures to help control indoor air quality and improve the health and safety of all individuals using the school.

As a part of the District's policy, employees and visitors are expected to honor these policies and procedures at all district buildings and facilities. Employee complaints or concerns regarding the implementation and/or enforcement of this policy should be discussed with their supervisor or the IEQ Coordinator.

Any person violating this policy will be subject to the same disciplinary actions that accompany any infraction of District policies and procedures. For employee violations, for example, possible actions include, but are not necessarily limited to: employee counseling, oral reminder, written reminder, probation and termination from employment.

As of May 1, 2012, the State of Wisconsin is requiring school districts to implement an Indoor Environmental Quality Management Plan.

#### **Plan/Procedure**

### **Indoor Environmental Quality Management Plan**

#### **Mission Statement**

School buildings kept in good repair, suitably equipped and in safe and sanitary condition promote a positive learning environment. In accordance with the requirements identified under Wisconsin Statutes 120.12 (5) and 121.02 (1) (i) and Wisconsin Administrative Code PI 8.01 (2) (i), the Middleton-Cross Plains Area School District has taken appropriate steps to provide and maintain safe and healthful facilities.

As required in WI Stat. 118.075 (3) and (4), the Middleton-Cross Plains Area School District maintains indoor environmental quality (IEQ) in schools with measures that include quality heating, ventilation and air conditioning (HVAC) systems, moisture control, integrated pest management, cleaning and maintenance schedules, appropriate materials selection, routine building inspections by maintenance personnel, appropriate training of staff, and communication.

#### **Role of the IEQ Coordinator**

The Middleton-Cross Plains Area School District has identified the Facilities Services Manager, Dean Paskey as the IEQ Coordinator for the District's facilities.

The IEQ coordinator may be contacted at [dpaskey@mcpasd.k12.wi.us](mailto:dpaskey@mcpasd.k12.wi.us), (608)829-2341.

The IEQ Coordinator serves as the primary contact person for issues related to IEQ within the school district. The Coordinator is responsible for:

1. Collecting written IEQ concerns and ensuring that the contact information is recorded for the person(s) reporting the concern(s);
2. Communicating with the administration and the school board as needed about IEQ concerns that have been reported;
3. Determining if an investigation is necessary and assigning the appropriate individual(s) to investigate the concern as needed;
4. Communicating an anticipated timeline for completion of the investigation;
5. Sharing results of the investigation with the concerned person(s), administration and school board as appropriate;
6. Ensuring that proper follow-up, remediation, and clean-up if needed, is scheduled and completed in a timely matter;
7. Maintaining a complete record of IEQ concerns and resolutions for a minimum of seven years;
8. Advising the school board as necessary if updates and/or changes are necessary to the district's IEQ management plan;
9. Communicating with staff, parents, and other parties regarding IEQ; and
10. Leading an IEQ team if the district determines that a team is necessary to assist the IEQ Coordinator(s) with policy revisions, review of building concerns, communications, or other tasks as necessary.

## **Communication**

The Middleton-Cross Plains Area School District's communication plan to inform staff, students, parents, and the public of the district's indoor environmental quality (IEQ) status includes the following:

- A. Annual notice to students, staff, and the community that the district has an IEQ management plan in place, using the District's website, Back to School Newsletter or other appropriate means;
- B. Designation of contact persons for IEQ concerns and definition of responsibilities;
- C. Development of policies related to IEQ of the district's buildings that will be reviewed periodically along with other district policies;
- D. Use of the district's current procedures to provide information to the media regarding non-emergency situations; and
- E. Accommodation of the needs of students, parents, and staff in the event of an IEQ emergency. One or more contact persons will be identified to work with the media and update the community during an IEQ event.

## **Reporting**

The Middleton-Cross Plains Area School District encourages the prompt reporting and resolution of any and all IEQ concerns to provide a healthy and comfortable environment for students, staff, and visitors and avoid unnecessary costs related to the neglect of IEQ issues.

The Middleton-Cross Plains Area School District's procedures for the reporting of IEQ concerns are outlined under the responsibilities of the IEQ coordinator. A form will be provided for staff, students, parents or members of the public to report IEQ concerns in writing (See Appendix A). This form is electronically available to administrative staff at the school district web site and can be provided upon request.

## **Addressing IEQ Findings**

In cooperation with the districts Health and Safety Consultant, the IEQ Coordinator will use a variety of tools, such as the *Tools for Schools Problem Solving Wheel*, *Problem Solving Checklist*, and Sections 4-6 of the *Tools for Schools Indoor Air Quality (IAQ) Reference Guide* to help identify IEQ problems and provide for appropriate resolution.

When formal IEQ concern investigations result in the identification of specific IEQ issues, the issues will be prioritized from most to least critical, ensuring that urgent or simple issues are addressed promptly and issues that require continual attention are scheduled for regular review as appropriate. If the source of a problem cannot be identified or the problem persists despite the initial efforts by district staff to identify and remediate, the IEQ Coordinator will discuss the matter with the appropriate district official(s) in order to determine whether a contract with professionals, experts, and other outside personnel may be needed.

The IEQ Coordinator will ensure that results from the official IEQ concern investigation are recorded, actions taken are documented, a response is coordinated, and communication is made with all relevant parties. Copies of all documents will be kept by the IEQ Coordinator. As needed, the IEQ Coordinator will develop and recommend specific policy changes for non-urgent issues that can be addressed by district policies and present the recommendations to the District Administration for review and, where appropriate, implementation. New or revised policies may be added to this IEQ Management Plan.

## **IEQ - Policies, Plans and Guidelines**

### ***Non-Smoking Policy***

Wisconsin Statute 101.123 (2) (a) 2 prohibits tobacco use in all educational facilities.

### ***Animals in the Classroom Policy***

The educational value of animals in the school setting is recognized by the Middleton-Cross Plains Area School District. However, conditions must be maintained to insure the safety and well being of students, staff and the animals. Live animals may be brought into the classroom as part of a written curriculum, with the approval of the school principal. Animals trained to assist individuals with disabilities are allowed in schools provided the health, safety and welfare of the student, staff and animal are not compromised. Specific restrictions regarding reptiles, undomesticated animals, birds, wolf hybrids and stray animals apply. In general, animals must be handled according to the recommendations of the Wisconsin Humane Society and Wisconsin Division of Health. The specific district policy can be found on the district's web site.

### ***Hazardous Materials Plan***

Continuous efforts are made to minimize hazardous materials within the school district. Science chemical waste is neutralized and disposed of in-house by trained personnel. Where hazardous waste is generated, appropriate disposal is contracted and waste manifested to insure safe and compliant disposal. Manifesting and program records are on file at the District Operations Center.

Reportable quantities of Hazardous chemicals as defined by the Wisconsin Emergency Management are inventoried and reported annually - Tier Two reporting. The local Emergency planning committee and Fire Department also receive this inventory. Records and procedure are available from the Facilities Services Manager.

### ***Asbestos Hazard Emergency Response Act (AHERA)***

AHERA is a federal law which requires that all primary and secondary schools develop and implement a plan for managing all district building materials which may contain asbestos. As part of this plan, very specific practices are mandated including: periodic inspections, maintenance, removal practices and annual notification. New buildings are inspected and detailed inventories are maintained. Asbestos materials are also investigated prior to any renovations which may disturb suspect materials. The complete asbestos management plan is accessible on the district's Health and Safety page found on the district's web site.

### ***Integrated Pest Management Program***

In compliance with 2001 pest management regulations, the Middleton–Cross Plains School Area School District uses a non chemical approach to pest control where feasible. Where pesticides are used, only certified applicators are used and appropriate notices posted after each application. Efforts are focused on pest suppression and control while reducing human exposure to dangerous chemicals. The Integrated Pest Management Program is available from the Facilities Services Manager.

### ***Lead Plan***

The Middleton–Cross Plains Area School District's lead paint policy strictly follows the mandated Renovation, Repair and Painting Rule – DHS 163. This rule requires sampling and safe work practices where lead painted coatings are disturbed (more than 20 square feet outdoors, more than 6 square feet indoors) in pre-1978, child occupied buildings. The plan and the historical sampling results and inspection details are accessible on the district's Health and Safety page found on the District's web site.

### ***Radon Gas Plan***

Periodic radon samples are gathered in occupied areas below grade (ground level). Where conducted, testing is performed for a 90 day period, during "closed" conditions (heating season) to demonstrate worst case exposure conditions. Specific sampling results are on file at the District Operation Center.

### ***Anti-Idling Guideline***

Exposure to diesel exhaust can cause lung damage and respiratory problems. Diesel exhaust exacerbates asthma, existing allergies, and long-term exposure is thought to increase the risk of lung cancer. The Middleton–Cross Plains Area School District is committed to eliminate all unnecessary idling by school buses. School buses are directed to not idle unnecessarily on school grounds. Exceptions are made for excessive weather conditions. The general temperature and time allotments are:

|            |           |
|------------|-----------|
| Above 20°  | 5 min.    |
| -10° - 20° | 15 min.   |
| -10° below | as needed |

The Anti-Idling Guideline is available from the Transportation Services Manager.

***Additional Policies may be developed as needed.***

## **Procedures for Maintenance and Facility Operations**

The Middleton-Cross Plains Area School District has implemented procedures for maintenance and facility operation including the following:

### **A. Cleaning and Chemicals**

Regular and thorough cleaning is an important means for the removal of air pollutant sources. The Middleton-Cross Plains Area School District has developed detailed written procedures for cleaning and for the handling of cleaning and chemical compounds. Cleaning procedures are managed and maintained by the Facilities Department.

### **B. Flooring**

Regular and effective cleaning and maintenance of all floor coverings used in district buildings is essential to keep floors dry and clean. The Middleton-Cross Plains Area School District has developed written floor cleaning procedures that ensure that all carpets are cleaned at least once a year. Cleaning is not performed unless drying within 24 hours can be assured. Automatic scrubbers and wet/dry mops are used on resilient floor coverings.

### **C. Preventive Maintenance and Operations**

Preventive maintenance involves routine inspection, adjustment, and repair of building structures and systems, including the heating, ventilating, and air conditioning system (HVAC); unit ventilators; local exhaust; fresh air intakes; and flooring. Preventive maintenance plays a major role in maintaining the quality of air by assuring that the building systems are operating effectively and efficiently to maintain comfortable temperatures and humidity in occupied spaces. The Middleton-Cross Plains Area School District addresses preventive maintenance by maintaining and documenting equipment and system maintenance according to manufacturer's recommendations and best practice. Specific written procedures are available upon request.

### **D. Microbial Management**

Microbials such as mold, bacteria, and viruses, are a significant cause of illness, health symptoms, and discomfort for building occupants. Moisture control is the most effective

way to control microbial growth. The Middleton-Cross Plains Area School District manages microbial concerns by promptly investigating signs of water intrusion and/or microbial growth. Materials contaminated with microbials will be promptly and appropriately cleaned or replaced following current guidance document recommendations. Mold growth will be properly removed from non-porous surfaces by trained staff or contracted service personnel using appropriate methods and equipment. Remediation projects that cannot be handled by trained staff will be contracted to appropriate professionals. Specific control and protection measures are used as needed for large-scale remediation projects. Complete professional remediation is verified through third party clearance testing as necessary. Specific written procedures and project documentation are available upon request

## **Construction and Renovation**

The Middleton-Cross Plains Area School District adheres to all state, federal, and municipal building code guidelines and other mandates/rules/regulations when doing construction and/or renovation projects. These regulations include the Wisconsin State Building Codes which can be found at <http://dsps.wi.gov/sb/SB-DivCodesListing.html>.

The School District considers IEQ when planning construction and renovation projects. Walkthrough inspections and historical building system evaluations are an integral part of the planning process. Careful consideration will be given to the direct and indirect impact on IEQ as a result of construction, demolition and renovation work. Appropriate control measures will be instituted by the Construction Management Team.

## **Staff Responsibilities for Maintaining Good IEQ**

Middleton-Cross Plains Area School District staff members play an important role in maintaining and improving environmental quality. Since the actions of staff members can affect the quality of the indoor environment in school buildings, employees are provided with information and training about IEQ as appropriate.

To the extent possible and as resources allow, the district will:

- A. Train Maintenance and custodial staff annually in general concepts of IEQ including indoor air quality, integrated pest management, microbial identification and cleaning, etc. as part of the annual training process. New staff members will be informed on appropriate elements of as part of the initial hiring and training process.
- B. Instruct custodians to follow all policies regarding cleaning chemicals, ensure that the school is regularly vacuumed and swept, clean drain pans, empty trash cans, and check drain pipes regularly. They also look for signs of pest problems and inform the appropriate party of any issues.
- C. Inform general staff members as needed through e-mail communication, personal communication and/or all staff briefings.
- D. Instruct teachers to help to maintain adequate airflow from ventilators by: refraining from stacking books or other items on ventilators, refraining from covering vents with posters, refraining from turning off fans due to noise, removing clutter in their classrooms,

properly disposing of hazardous waste, and enforcing the school's various IEQ policies in their classrooms.

- E. Communicate the school's activities to the school board, staff, students, and community and ensure that the school is implementing IEQ policies appropriately.
- F. Ensure that the Facility Operators maintain HVAC systems, properly operate systems and that all buildings are maintained adequately and cleaned regularly.
- G. Ensure that Health Officers/School Nurses track illnesses, such as asthma, that may provide an early warning of IEQ problems.

### **Prevention of IEQ Problems**

The Middleton-Cross Plains Area School District is committed to preventing IEQ problems. To reach this goal, to the extent possible and as resources allow, the district will:

- A. Keep equipment and operating systems in good working condition and make every effort to best accommodate the needs and comfort of students, staff, and other users of the school building.
- B. Evaluate building systems and conduct walkthroughs of the various district buildings, schedule regular review and maintenance for those systems that require continual attention, and handle IEQ concerns identified during the walkthroughs in accordance with this plan; and
- C. Comply with all applicable codes and operate current systems according to manufacturer design to help ensure high quality facilities for all district functions.

## Appendix A

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Appendix A shall be completed by the person with the IEQ concern and then forwarded to the IEQ coordinator at [dpaskey@mcpasd.k12.wi.us](mailto:dpaskey@mcpasd.k12.wi.us) and the building's principal or designated administrator.

### Indoor Environmental Quality (IEQ) Concern Record

|   |                                  |                                 |   |
|---|----------------------------------|---------------------------------|---|
|   |                                  |                                 | Date Mo./Day/Yr.                          |
| <b>General Information</b>                |                                  |                                 |   |
| Name, First, Last                         | Email Address                    |                                 | Phone Area Code/No.                       |
| Street Address                            | City                             | State                           | Zip                                       |
| Status in Filing Concern <i>Check One</i> |                                  |                                 |   |
| <input type="checkbox"/> Staff            | <input type="checkbox"/> Student | <input type="checkbox"/> Parent | <input type="checkbox"/> Member of Public |

Symptoms of poor indoor air quality are very broad and depend on the contaminant. They can easily be mistaken for symptoms of other illnesses such as allergies, stress, colds and influenza. Common symptoms include:

- Coughing
- Sneezing
- Watery eyes
- Fatigue
- Dizziness
- Headaches
- Upper respiratory congestion

If relief from symptoms is experienced upon leaving a particular room, area or building, the cause may be an indoor air contaminant.

### **OCCUPANT COMFORT QUESTIONNAIRE**

Room Where Majority of Day is Spent? \_\_\_\_\_

Other Rooms Occupied on a Regular Basis? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How Long Have You Worked In:

This Room/Area? \_\_\_\_\_

This Building? \_\_\_\_\_



What Rooms Have You Worked In Prior To The Above Stated Location:

Buildings: \_\_\_\_\_

Rooms: \_\_\_\_\_

Describe your Indoor Air Quality concerns related to the building?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Are Problems More Evident In One Room? \_\_\_\_\_

\_\_\_\_\_

When Do You Experience Relief From These Symptoms? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

When Do These Problems Usually Occur?

Time of Day: AM\_\_\_\_\_ PM\_\_\_\_\_ Evening\_\_\_\_\_

Day of Week: M T W TH F Sat Sun

Month: J F M A M J J A S O N D

Season: Spring Summer Fall Winter

At What Time Do Symptoms Disappear, If Any? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

In Your Opinion, What Is The Cause of The Perceived Indoor Air Quality Problem?

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Comments: Please comment on factors you consider to be important concerning the quality of your work environment:

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| <b>IEQ COORDINATOR'S USE ONLY</b><br><b>Attach all other pertinent documentation</b> |   |  |                                |
|--|---|--|--------------------------------|
| Date Recorded<br>Mo./Day/Yr.   | Date Investigation<br>Begun: Mo/Day/Yr. | Date Investigation<br>Complete: Mo./Day/Yr.                          | Person Assigned to Investigate |
| Result of Investigation  |   |  |                                |
| Clean-up, Remediation or Other Work<br>Necessary<br><br>Yes      No                  |   | Person Assigned First & Last Name                                    |                                |
| Date Work Begun Mo./Day/Yr.  | Date Work Complete<br>Mo./Day/Yr.       | Follow-Up Contact Made<br>No      Yes<br><br>Date of follow up _____ |                                |