



Indoor Environmental Quality Management Plan

Updated July 1, 2021

This management plan for indoor environmental quality (IEQ) in schools was prepared by Menasha Joint School District, as directed by 2009 Wisconsin Act 96 and Board of Education Policy 8405. The information contained within this document is the program that this district will follow. Each section and corresponding appendices describe how the district will address each IEQ topic. This program includes plans, processes, procedures, policies and/or activities that are already in place and/or are being developed to prevent or resolve concerns over indoor environmental quality. The goal of this program is to demonstrate compliance with the planning and implementation requirement of our Indoor Environmental Quality Plan. The following areas are addressed: mission statement, role of the IEQ coordinator, communication, reporting, addressing IEQ findings, IEQ policies, procedures for maintenance and facility operations, construction and renovation, staff responsibilities for maintaining good IEQ, and prevention of IEQ problems.

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1. Mission Statement

School buildings are kept in good repair, suitably equipped and in safe and sanitary condition to 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 Menasha Joint School District's designated officials will take appropriate steps to provide and maintain safe and healthful facilities.

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

2. Role of the IEQ Coordinator

The Menasha Joint School District has identified the District Supervisor of Facilities and Safety as the IEQ Coordinator for all buildings within the district.

The IEQ Coordinator's responsibilities will be determined as appropriate, however, shall include and are not limited to:

- Serving as the primary contact person for issues related to IEQ within each school building. The Coordinator will be responsible for:
 - collecting written IEQ concerns from appropriate staff and ensuring that the contact information is recorded for the person reporting the concern(s);
 - communicating with the administration and the school board about IEQ concerns that have been reported as necessary;
 - determining if an investigation is necessary and assigning an appropriate individual to investigate the concern;
 - communicating an anticipated timeline for completion of the investigation;
 - sharing results of the investigation with the appropriate parties among administration as necessary;
 - ensuring that proper follow-up, remediation, and clean-up is scheduled and completed in a timely matter;
 - maintaining a complete record of IEQ concerns and resolutions for a minimum of seven years;
 - advising the school administration if updates and/or changes are necessary to the district's IEQ management plan;
 - communicating with staff, parents, and other parties regarding IEQ; and
 - leading an IEQ team if the district determines a team is necessary to assist the IEQ Coordinator(s) with policy revisions, review of building concerns, communications, or other tasks as necessary

3. Communication

The Menasha Joint School District's communication plan to inform staff, students, parents, and the public of the District's indoor environmental quality (IEQ) status has been developed as deemed appropriate, however, does include the following:

- annual publication of a notice to students, staff, and the community that the district has an IEQ management plan in place, using the website, student handbook, the local newspaper, or other appropriate means;
- designation of contact persons for IEQ concerns and definition of responsibilities;
- development of policies related to IEQ of the district's buildings that will be reviewed periodically along with other district policies;
- use of the district's current procedures to provide information to the media regarding non-emergency situations;

- accommodation of the needs of students, parents, and staff to the best extent possible 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 a crisis. The person/people will be determined by the district administrator.

4. Reporting

The Menasha Joint 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 Menasha Joint School District procedures for the reporting of IEQ concerns have been developed. It is determined per this plan that all IEQ concerns will be reported and discussed with the building principal/designee. The concerned party and the Principal will thoroughly complete Appendix B of this document, Indoor Environmental Quality Concern Form. The concern will then be forwarded to and discussed as appropriate with the IEQ Coordinator. In turn, the IEQ Coordinator will then task investigation responsibilities to staff as appropriate. The IEQ Coordinator will then report back findings of the investigation and should the investigation result in an IEQ issue how that issue will be addressed and in what time frame documenting on the received Appendix B. The building principal/ designee will follow up, as needed, with the reporting concerned party and document this at the bottom of Appendix B as well.

5. Addressing IEQ Findings

The IEQ Coordinator will act as directed by the district administrator and 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. The Tools for Schools materials can be found at www.epa.gov/iaq/schools/index. Additionally, the IEQ Coordinator may refer the concern to a maintenance staff person or contractor to investigate if necessary as funding allows and will as appropriate given budget and staffing.

When formal IEQ concern investigations result in the identification of specific IEQ issues, the issues will be dealt with as appropriate while prioritizing 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 it, the IEQ Coordinator will discuss the matter with the appropriate district official(s) in order to determine whether a meeting with professionals, experts, and other outside personnel may be needed.

As described in Section 2 of this plan, 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 building's IEQ Coordinator. 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 administrator for review. New or revised policies will be added to this IEQ Management Plan.

6. IEQ Policies

The Menasha Joint School District will develop IEQ related policies as needed. The school district has developed, or will develop, formal district policies based on existing procedures and practices, and has adopted the following as its IEQ Policies:

- Non-Smoking Policy: Wisconsin Statute 101.123 (2) (a) 2 prohibits tobacco use in all educational facilities.
- Animals in the Classroom Policy
- Hazardous or Toxic Materials Policy
- Asbestos Hazard Emergency Response Act (AHERA) Management Plan
- Integrated Pest Management Program

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- Lead Policy
- Anti-Idling Policy

7. Procedures for Maintenance and Facility Operations

A. Cleaning and Chemicals:

Regular and thorough cleaning is an important means for the removal of air pollutant sources. The Menasha Joint School District will address cleaning and chemical handling issues as appropriate. However, the school district will develop written procedures for cleaning and handling of cleaning and chemical compounds.

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 Menasha Joint School District will maintain flooring as appropriate and or will develop written floor cleaning procedures.

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. 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 Menasha Joint School District will address preventive maintenance as appropriate. The school district will also provide operations manuals and maintenance records for each major piece of equipment or system to ensure routine maintenance.

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 Menasha Joint School District will manage microbials as appropriate. It is school district policy to promptly investigate signs of water intrusion and/or microbial growth. Materials contaminated with microbials will be promptly cleaned or replaced. Mold growth will be removed from non-porous surfaces with a strong brush and non-ammonia containing detergent and thorough drying. Remediation projects that cannot be handled by district staff will be contracted to appropriate professionals. Specific control and protection measures will be used as needed for large-scale remediation projects.

8. Construction and Renovation

The Menasha Joint School District will adhere to the state, federal and municipal building code guidelines and other mandates/rules/regulations when doing construction and/or renovation projects, including the Wisconsin State Building Codes that can be found at www.dsps.wi.gov/sb/SB-DivCodesListing. The Menasha Joint School District will comply with all building codes and consider IEQ when planning construction and renovation projects. The findings from walk-through inspections and building systems evaluations will be considered when planning renovations.

The Menasha Joint School District requires that should a project require project or bid specification documentation, language will be included to notify potential contractors of the district's IEQ plan and their commitment to maintaining IEQ. The language will state that the plan is available for review and that any and all IEQ concerns related to the proposed work will be the responsibility of the contracted party. To help ensure this, the district will require the use of a Contractor Liability Form and signature of the contractor prior to any work.

9. Staff Responsibilities for Maintaining Good IEQ

All Menasha Joint 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 will be provided with information and training about IEQ as appropriate through online tools and materials identified in the recommendations of the School's IEQ Coordinator.

Information and training for all staff will be provided as needed using online tools, materials, or webinars to the extent possible, with more specialized training secured for maintenance and/or buildings and grounds staff as funding permits.

- A. **Teachers** will help to maintain adequate airflow from ventilators by, for example, by refraining from stacking books or other items on ventilators, covering vents with posters or turning unit vent fans off due to noise. Teachers will remove clutter in their classrooms, properly disposing of hazardous waste, and make good faith attempts to enforce the school's various IEQ policies in their classrooms. Teachers will ensure that to the best of their ability food is not stored in the classrooms. When it is necessary to store food in the classroom, it shall be kept in airtight, sealed containers to minimize pests, odors and biological growth.
- B. **Administrators** will communicate the school's activities as deemed appropriate to the school board, staff, students, and community and ensure that the school is implementing IEQ policies appropriately by their supervision and support of the plan.
- C. **Facility Operators** will ensure that HVAC systems are operating properly. Will conduct operations and maintenance on building systems and do routine inspections of the district buildings and property.
- D. **Cleaning Staff** will follow all district policies regarding cleaning chemicals, ensure that school is regularly cleaned and maintained per district standards. They also look for signs of IEQ issues, including pest problems, and inform the appropriate parties of any issues immediately.
- E. **Health Officers** will track illnesses reported, such as asthma, which may provide an early warning of IEQ problems.
- F. **The School Board** will approve, if deemed necessary, and in general support the IEQ Management Plan of the district.
- G. **All Staff** for safety and health concerns, will not bring into Menasha Joint School District any type of fragrance products (candles, plug-ins, spray air fresheners, etc.). These products can release harsh chemicals which can cause headaches, nausea and even trigger asthma attacks. Most fragrance products are also listed as Volatile Organic Compounds (VOC's) by the Environmental Protection Agency (EPA).

10. Prevention of IEQ Problems

The Menasha Joint School District is committed to preventing IEQ problems. To reach this goal, the district will take whatever actions are appropriate and possible given availability of budget and staffing. Additional prevention efforts will include:

- keeping 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;
- evaluate building systems and conduct walk-throughs 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 #5 in this plan;
- comply with all applicable codes and operate current systems based on how they were designed to be used to ensure high quality facilities for all district functions

Appendix A
IEQ Concern Response, Reporting, and Investigation Procedure

	Number: 1
	Date: 11.19.12
	Revision:
Procedure: IEQ Concern Response, Reporting, & Investigation	Page: 1 of 3

1.0 GENERAL

- 1.1 **Purpose:** The purpose of this procedure is to provide guidance on IEQ concern response, reporting, and investigation.
- 1.2 **Scope:** This procedure applies to all employees whenever a concern occurs.
- 1.3 **Responsibility:** It is the responsibility of every employee to comply with this procedure.

2.0 REPORTING

- 2.1 **Medical Concern:** Any time there is an injury/illness/accident all employees are empowered to call 911 if deemed necessary. If it is not an emergency situation, first aid can be administered by an employee trained in first aid/CPR.
- 2.2 **Notification:** The employee must notify the IEQ Coordinator immediately after the IEQ concern is realized.
- 2.3 **Documentation:** IEQ coordinator will collect written IEQ concerns and ensuring that the contact information is recorded for the person reporting the concern(s). The concern is documented on the IEQ Concern Form located in Appendix B.

3.0 COMMUNICATION

- 3.1 IEQ Coordinator will communicate with the administration and the school board about IEQ concerns that have been reported as deemed necessary;
- 3.2 IEQ Coordinator will determine if an investigation is necessary and assigning an appropriate individual to investigate the concern and will communicate this step;
- 3.3 IEQ Coordinator will communicate an anticipated timeline for completion of the investigation;
- 3.4 IEQ Coordinator will share results of the investigation with the concerned person, administration and school board;

4.0 PROCESS

- 4.1 IEQ Coordinator will ensure that proper follow-up, remediation, and clean-up is scheduled and completed in a timely matter;
- 4.2 IEQ Coordinator will maintain a complete record of IEQ concerns and resolutions for a minimum of seven years;
- 4.3 IEQ Coordinator will advise the school board if updates and/or changes are necessary to the district's IEQ management plan;
- 4.4 IEQ Coordinator will communicate with staff, parents, and other parties regarding IEQ;
- 4.5 IEQ Coordinator will lead 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.

5.0 LEAVING / RETURNING TO WORK

- 5.1 **Leaving Work:** If an employee leaves work in order to seek medical attention he or she must:
 - 5.1.1 Give information to the IEQ Coordinator as necessary to complete the IEQ concern form.
 - 5.1.2 Get approval from the supervisor. The supervisor can assign the person to modified duty for the remainder of the shift if they choose to seek medical attention after their shift or not at all.
 - 5.1.3 An employee cannot leave before the end of their shift following an injury/issue without reporting the injury and obtaining the supervisor's permission.
- 5.2 **Seeking Medical Attention After Shift End:** If an employee seeks medical attention after the end of their shift it is their responsibility to bring the documentation from the attending medical professional with them to work, and submit it to the supervisor before the start of their next scheduled shift.
- 5.3 **Returning With Restrictions:** Any employee returning to work after seeking medical attention must be cleared by the supervisor. Upon returning to work the employee must report to the supervisor and present the documentation supplied by the attending medical professional.
- 5.4 **Returning To Work After Medical Transport:** Any employee returning to work after medical transport should report directly to their supervisor on their first day back. The employee must present the documentation supplied by the attending medical professional to the supervisor. At that time the supervisor will determine if the employee may return to their original job or if modified duty is necessary.

6.0 COMPLETING THE IEQ INVESTIGATION

- 6.1 The IEQ Coordinator/supervisor is available as a resource for all steps in the IEQ concern response, reporting, and investigation process and will review all completed IEQ concern investigations.
- 6.2 The IEQ Coordinator/supervisor is responsible for completing the employee statement and determines the root cause. A copy of the signed employee statement must be turned into the IEQ Coordinator. It is also the IEQ Coordinator's responsibility to complete the Corrective Action Plan portion of the IEQ Concern Form, which is located in Appendix B. The Corrective Action Plan should address the root cause, determined by the safety report, and could include maintenance requests, retraining, procedural change, etc. It is then the IEQ coordinator's responsibility to meet with their supervisor to discuss the Corrective Action Plan. Once both of the supervisors agree on the corrective action the plan should be sent to the district administrator.
- 6.3 The district administrator will review all completed IEQ Concern Investigations and will track completion of all follow-up to ensure timely completion.

**Appendix B
Indoor Environmental Quality (IEQ) Concern Form**

General Information			Date:
Name:		Email Address:	
Address:			Phone:
Staff	Student	Parent	Other
Simple Issue	Moderate Concern	Urgent Concern	Immediate Concern
Building of Concern:		Type of Concern:	
Describe IEQ Concern – Attach any supporting documentation			
IEQ Coordinator's Use Only Attach all other pertinent documentation			
Date Recorded:		Person assigned to investigate:	
Date Investigation Began:		Date Investigation Complete:	
Result of Investigation			
Clean up, Remediation, or Other Work Necessary: _____ No _____ Yes		Person Assigned:	
Date Work Began:		Date Work Complete:	
Follow Up Contact Made: _____ No _____ Yes, Date of follow up:			

Appendix C Lead Safe School Policy

Administrative Policy

The District is committed to making all facilities lead safe. The safety of students, staff and visitors is of the highest priority. The District recognizes that the threat posed to children by lead poisoning and recognizes its responsibility to have our facilities free of the dangers of lead poisoning. Therefore, the administration declares that all of its school buildings must be lead safe. The administration supports strict enforcement of all local, state and federal laws designed to prevent lead poisoning throughout facilities of the district.

Procedure

To ensure lead safety in the District facilities the following will be followed in regards to lead;

1. Ensure district staff adheres to regulations regarding the use and maintenance of lead bearing products. Education and training will be provided for district staff as required to maintain safe lead practices.
2. Be able to provide community and building users of the risks of lead exposure, the effects and visible symptoms of lead exposure should the information be requested.
3. Provide annual inspection reports regarding visual lead paint inspections, remediation and resulting communication. This will include contractor notification forms.
4. Develop and implement clearly defined avenues for district staff, parents, community members and other users of the district facilities to report school environments that are suspect of being lead hazardous
5. Commit to safe lead renovation and removal when appropriate giving budget and staffing.

Appendix D Pest Management

Pest Management Policy Statement

When a pesticide must be used to meet important management goals, the least hazardous material adequate to control the pest should be chosen and label directions should be followed exactly. The application of pesticides may be subject to school district policies and procedures, the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code 136 et seq.), EPA regulations in 40 Code of Federal Regulations, OSHA regulations, and state and local regulations.

Pests

Pests are unwanted populations of living organisms (animals, plants, or microorganisms). Strategies for managing pest populations will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

Pest Management

Approved pest management plans should be developed for the site and should include proposed pest management measures to:

- Reduce any potential human health hazard or to protect against a significant threat to public safety.
- Prevent loss of or damage to school structures or property.
- Prevent pests from spreading into the community or to plant and animal populations beyond the site.
- Enhance the quality of life to students, staff, and others.

Integrated Pest Management Procedures

Integrated pest management (IPM) procedures will be used to determine when to control pests and whether to use mechanical, physical, chemical, or biological means. IPM practitioners depend on current, comprehensive information about the pest and its environment, and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage by the most economical means and with the least possible hazard to people, property, and the environment.

The decision to use a pesticide will be based on a review of all other available options and a determination that these options are not acceptable or are not feasible. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents, and selected non-chemical pest management methods will be implemented whenever possible to provide the desired control. It is the policy of this school district to utilize IPM principles to manage pest populations adequately. The full range of alternatives, including no action, will be considered.

Education

Staff, students, pest managers, and the public will be educated about potential school pest problems and the IPM policies and procedures that will be implemented.

Record Keeping

Records of pesticide use shall be maintained onsite to meet the requirements of the state regulatory agency and school board. Records must be current and accurate for IPM to be effective. In addition, pest surveillance data sheets that record the number of pests or other indicators of pest populations should be maintained to verify the need for treatments.

Notification

Menasha Joint School District will be responsible for notifying school staff and parents in advance of any pesticide applications, if deemed necessary. Menasha Joint School District will ensure that all laws are followed in regards to notification and posting following application of any pesticides.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized by the Supervisor of Buildings, Grounds, and safety for use during the year. Pesticides will be stored and disposed of in accordance with the EPA-

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registered label directions and state regulations. Pesticides must be stored in an area inaccessible to students or unauthorized personnel.

Pesticide Applicators

Pesticide applicators must have a working knowledge of the principles and practices of IPM and use only pesticides approved by this school district. They must follow regulations and label precautions. Applicators must comply with this school district IPM policy and pest management plan.

Pests and pesticides can pose significant problems and risks to people, property, and the environment. It is, therefore, the policy of Menasha Joint School District to incorporate IPM procedures for control of structural and landscape pests. This policy will minimize the amount and toxicity of pesticides used in the school.