

## **Youth Farm Safety Education and Certification (YFSEC) Competitive Grants Program**

### **Stakeholder Listening Session Transcript (COMMENTS ONLY)**

**Barbara Lee**

**Director**

**National Children's Center for Rural and Agricultural Health and Safety**

**Marshfield, WI**

I want to thank you for the opportunity to comment on the Youth Farm Safety Education & Certification program. We commend USDA for its willingness to seek stakeholder input prior to renewing its competitive grants program. As support for my oral statement, which will be followed up next week with written comments, let me provide a little background.

I am a nurse and a behavioral scientist by training, but, more importantly, I am a mother, now a grandmother. On a weekly basis I receive news updates on agricultural-related fatalities and serious injuries affecting children. This issue of protecting children from farm injuries is something I take very seriously. Since 1997 I have served as the Director of NIOSH's [National Institute of Occupational Safety and Health, at CDC] Children's Center for Rural and Ag Health & Safety [in Wisconsin] and we have received federal support to conduct research to evaluate, interventions and offer technical assistance to individuals and organizations addressing safety for children living on, working on and visiting on our nation's 2 million farms.

Our center developed the first national action plan for protecting children and agriculture, which was issued in 1986, and we updated the plan in 2001 and, again, this year. Also, our Center led to the consensus driven development of North American guidelines for children's agricultural tasks, and research has shown that when used by farms or parents the guidelines reduce childhood injuries on family farms by 58%.

The Federal Register Notice posed seven questions for us to address but rather than respond to each question, I would like to share several observations and state five specific recommendations from our center.

First, nonfatal injuries of nearly all causes among children are declining while work-related deaths on farms remain high. As child safety advocates, we believe the burden of knowing how and when to safeguard children younger than 18 years is primarily the responsibility of adults, not the children themselves. Yet, most of the child farm safety programs are squarely aimed at and for youth. We must keep in mind that children and youth are rarely empowered to institute basic safety steps, such as purchasing personal protective equipment, like steel toed shoes, or installing rollover protective structures on tractors, or repairing machinery and structures associated with the most horrendous injuries.

Over the past two decades, there have been hundreds of Farm Safety programs developed and delivered to children. We know these are good programs and it is unlikely that we need to develop any new curricula from scratch, unless it will be directed toward parents, farm owners

and employers responsible for protecting your workers. I wish there were a few simple strategies that could clearly guide your program in the future, but unfortunately, that is not the case. However, I will share five recommendations proposed by our National Children's Center's staff.

First, convene a national advisory group, representing all regions of the country, to provide oversight and continued guidance for the program. Second, develop and expand the program based on health and injury data to ensure that the program is evidence-based and focuses on the areas of greatest need. Third, evaluate the impact of the safety education program on observed behavior change and prevention of injuries, not merely a passing standardized, knowledge-gained test. Fourth, we should broaden the focus of youth for Ag safety education and training to include parent, adult and those employers who make safety decisions on the farm. And fifth, we should partner with organizations and groups that have the potential to influence social and cultural norms regarding safety, such as tractor and implement dealers, farm organizations and rural insurance companies.

So, I thank you for this opportunity and we sincerely support your efforts to safeguard youth working in agriculture and we offer our assistance in any way, moving forward.

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**Mary Fleming**  
**Research Associate**  
**Center for Injury Research and Policy**  
**Nationwide Children's Hospital**  
**Ohio**

I am an agricultural health nurse. I have worked in this for 21 years in nursing and as the mother who lived on a farm and was raised on a farm I also share much of the concern that Barbara Lee has shared with us today. I further want to say I appreciate and thank the folks who have been responsible for obtaining the federal funding and the attention to this research because it has made some difference already. We still need to see further improvements and I would like to address a few suggestions for that at this time.

Some of the areas which I feel need some additional efforts are areas such as cancer prevention. It is a long-term health risk that we face as children and adults who live on farms. I think there needs to be continued effort towards respiratory protection and reducing the risk of chronic disease in the respiratory system. I think, when it comes to muscular skeletal injuries and prevention, these are additional injuries -- additional areas that need additional research and education for people in the farm sector.

I know there are a lot of youth involved in agricultural production activities and many strategies used in other industries don't apply easily to the tasks in an agricultural setting. I further support the increased use and application of the NAGCAT guidelines. One suggestion I would make is that we develop some curriculum for adults to focus on decision-making skills as parents and their ability to use risk management strategies for protecting children on the farm. I believe the

Farm Bureau program might be one way in which to disseminate that information in an effective manner.

I also feel that much of the youth farm safety curriculum has been designed for production activities without maybe a focus on educational information about preventing safety risks and, even more so, health risks as well.

I think a one-stop shop is not the best approach, I think having a couple of places where the information is available and some cost reference would be useful. There are times where due to natural disasters or electronic failures a particular site may not be available so, therefore, I believe a couple of sites would be in the best interest of making the information available.

When it comes to some of the partners we need to involve, I think a partnership with the health educators and the public schools, they are a large percentage of our population in rural communities where the health educators would be able to present some of the information about preventing farm injuries and farm fatalities and reducing the risk of chronic health conditions from the agricultural worksite.

Furthermore I think there is a continued need to emphasize ways to educate those non- farmers who happen to come to the agricultural operation, or come out to visit the family during the fall season, and I think social media is a great way to attract information and some of the information for those folks. One of the key ideas there is to identify youth leaders who are opinion leaders as young people who can really maximize that type of dissemination.

So, finally, efforts need to continue to actually identify best of the dissemination strategies for educational material and efforts need to be continued to, as Barbara suggested, identify ways in which parents, adults who are responsible, and employers can actually make a difference to impact the number of youth hurt through -- or are exposed -- to dangerous work settings and hazards associated with agriculture.

Thank you so much for taking the time to give this opportunity for feedback.

Additional comments:

Just a couple more comments about some additional partnerships within the health community. Primary care physicians are expected to provide counseling to families and patients on a regular basis about health and safety issues. I think there has not been nearly enough effort to engage them in some of these efforts with Farm Safety, particularly those who are in heavily rural areas.

I also would like to give a shout out to the [Indiscernible] program and the opportunity to work with nurses who work in private practice or work in rural communities as well. As key people who may be able to have an impact because they are highly regarded. The national Gallup poll for the last so many years has repeatedly said nurses are some of the most highly respected individuals when it comes to giving information.

One of the things we heard earlier, that we need a conference of approach to injury prevention while some of that is beyond the scope of the educational component we certainly do need to

have appropriate personal protective equipment, especially if young people approach adulthood and take on tasks with more hours in different exposure it will be important to have providers that have the expertise to do the training on using personal protective equipment and application about from a health perspective. Again the value of having accompanied the team and a collaborative team involving all the different stakeholders including health care providers is important.

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**Mary Miller**  
**Child Labor/Young Worker Specialist**  
**Employment Standards Program**  
**WA Department of Labor and Industries**  
**Washington**

Hi, thank you. My name is Mary Miller. I am an occupational health nurse and a Child Labor/Young Worker specialist at the Washington State Department of Labor and Industries. I want to thank you for this opportunity to provide a few brief remarks on this important program. My comments are an overview of key principles to consider. In addition, I will submit in writing a more detailed summary of recommendations for the specific items you listed in the Federal Register.

Over many years, there has been a great deal of work and emphasis on worker health and safety training programs by OSHA [Occupational Safety and Health Administration] and NIOSH, and much has been written about effective training programs and principles. It must be incorporated in these programs to provide the intended information and reach the target audience. Specifically for you, many recipients of the OSHA Susan Harwood Brown to focus on reaching young workers and their employers.

Also, NIOSH has a long-standing relationship developing health and safety curricula along with youth advocates use around the country. Several states including, Washington and California, have developed health and safety curricula for youth working in agriculture. Other programs have developed materials to reach the young workers -- supervisors of young workers, as well, so there are many resources and experts to draw upon during the season.

However it's important to stress health and safety training is an essential job skill needed to empower workers of any age, to take action where hazards are present in order to protect themselves. In any workplace setting where hazards exist, and agricultural being one of the most hazardous industry sectors, health and safety training does not remove the hazard. Health and safety training programs are intended to be one component of a more comprehensive program needed to create a safe and healthy work environment. In the hierarchy, control is optimal but that the hazards be removed or controlled by engineering methods so that the worker can be removed from the hazardous activity or setting. Health and safety training is intended to bring knowledge of work processes to those engaged in work in order to recognize the presence of

hazards and understand the steps it takes to minimize exposure and risk for injury including the refusal to perform work considered to be too dangerous.

Training must address literacy, language and cultural issues, and must be participatory and interactive and, where possible, peer-led and delivery using a variety of methods aimed at different learning styles with the intended audience.

In addition to how to safely perform a specific task or operate a piece of machinery, training curricula must include information about the OSHA health and safety standards, existing child labor relations, best practices where standards do not exist, basic proposals of hazard recognition using one's voice to speak up and take action. Since the existing regulatory structure under child labor regulations have not kept pace with the realities of agricultural work environment, efforts must be made to create guidance as to what is considered to be age appropriate for youth when assigning tasks. Being permitted to perform dangerous work and operate dangerous machinery does not correspond with these same activities being appropriate for youth to perform.

Supervision and mentoring should be incorporated in any site where youth are employed. Like the use of graduated driver's licensing has been demonstrated to reduce adolescent motor vehicle crashes, new and young workers should be assigned tasks with gradually increasing difficulty in order to have time to learn the task and adjust to the work environment.

Training, as a component of injury prevention and risk management, must include other key components, such as, worker participation, management commitment, supervisory support, allocation of resources, and a culture that promotes [indiscernible] and open communication. You are in a more vulnerable position for a number of reasons in part as a new and inexperienced worker and due to physical and cognitive developmental level but as non-adults they often have less power in an adult oriented environment to speak up or act on their own behalf. Training is not a substitute for reducing and removing hazards in the workplace and must not be considered to be the key intervention in reducing injuries and death. Efforts that only focus on changing worker behavior or performance about using the full range of other elements of the competence of injury and illness prevention program will not be sufficient in protecting your workers.

So, I thank you for this opportunity and I look forward to further discussion and dialogue and would like to participate in any further activities in developing these programs. Thank you very much.

Additional comments:

This is Mary Miller in Washington state. I just wanted to add in terms of collaborators, I did not hear any mention of a farm worker organizations, and also that we do have these Ag centers around the country, still, and hopefully for some time to come, that should be enlisted to participate and assist in this endeavor as well.

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**Kent Schescke**  
**Director of Strategic Partnerships**

**National FFA  
VA**

Thank you. This is Kent Schescke with the national FFA organization. I am the Director of Strategic Partnerships. I work closely with USDA and other government agencies.

I appreciate the opportunity to provide the comments I may have of our 7500 school-based agricultural education program of which FFA is an integral part across the country. Today, we have about 800,000 students, grade seven-12, enrolled in agricultural education programs. A critical component of our educational programs is the opportunity to learn through hands-on experience in an agricultural setting. We often refer to this as the Supervised Agricultural Experience program, SAE. Many of our students, especially those in the first years, often under the age of 16, receive their experiential Job learning through placement in an agricultural production setting. The on-site supervision of the students is provided by the employer, periodic supervision and visits by the agricultural education instructor. The primary purpose is to give students the opportunity to put to practice the knowledge and skills they learned in the classroom and laboratory. SAE provides real-world application of that knowledge and skills and helps reinforce the education the students are gaining. An important part of that knowledge and skills element is ensuring the safety of the student worker; teachers care deeply about their students and want to make sure they have the proper preparation, including workplace safety education. We applaud the efforts of the Secretary and USDA specifically in working to increasing the quality, effectiveness and utilization of safety education and resources for youth working in safety in agriculture.

As I put my responses together, they are around the seven questions.

Where are some of the current gaps? One of the gaps that exist - while there are a number of educational resources related to machinery and tractor safety, very little addresses areas such as livestock and other areas of agriculture production. Now, while much of the discussion the past year has been the primary focus around youth working and farm safety, we would like to see it broadened to a more general agricultural-related career pathways. And there is an interagency working group between the Department of Ed, the working model and some of these pathways would include looking at areas like agribusiness systems, biotechnology systems, environmental services, food production, processing systems and natural resources, plant systems, power structural technical systems. If we have this broad approach, it provides the opportunity for all young people who work in an agricultural setting, especially our students as it relates to SAE, to ensure they are receiving the appropriate youth safety instruction, that ties into the kind of work and experience that they are having.

The second question, the critical component, for this agricultural [safety program]. I think I have made six listed here. Number one - we need quality instructional resources. They need to be available both in print and non-print formats so they can be adopted in many educational settings. Second, we need reliable assessment tools, correlated to the instruction resources and helping students assess the students' knowledge, skills and readiness to perform work in these areas. We would like to see some type of student credentialing certification opportunity. It is an important part that will encourage and incentivize teachers to adopt and utilize these materials as

there is a great focus on industry recognized credentials within career and technical education in many of our programs. And we need not only a written assessment but also the tools to provide an authentic assessment, the hands-on part to assess the students' knowledge, skills and their abilities to perform.

Program evaluation, I would second the comment made I think by Barbara, earlier comments, there really needs to be a rigorous evaluation of whatever is developed and then measure the effectiveness and utilization. I would agree to behavior change that comes as part of these things it needs periodic, review and update as possible. We need professional development support to ensure that the professional -- proper use of these by our teachers, youth agents, volunteers, and parents have the tools and know-how to use the tools in a proper and consistent and reliable format. And the sixth one is we want to make sure the program is voluntary and not mandatory.

Question three about the one-stop education, it would be beneficial to have all of these resources centrally located and accessible so the students, teachers, parents, and employers can find them and use them. I think there's a lot of confusion under the system where you go, where to get the stuff, what relates to what and what doesn't. Does it allow for the aggregation of supplemental resources that would also be useful to teaching, but also ensure that the materials, resources and tools are consistent in their format and design? And we would like to see this develop possibly into a clearinghouse for other safety related resources that would be tied to some kind of word search or help others find what they are looking for, and need in a particular situation.

Q4 -- Back to the educational standards that should be considered and from our perspective there is three we would like to see included in this. The first one is a set of standards called the agriculture food and natural resource curriculum standards developed by the National Council of Ag Education to provide an overview correlated to a lot of the agricultural education programs we are using. The second one is a set of standards called the common group technical core standards adopted by the National Association of State Directors and career and technical education and really form a linkage then to the third set of standards, common core standards developed by the National Governors Association and the Council of State School Officers. The standards are adopted in 40 plus states across the country and if we design materials that we would like to use in school settings whether they be in agriculture, education or other areas of school I think that these are some of the things that will need to be in those to gain acceptance by the educators.

Question five about the outreach to the vulnerable populations we would like to see these resources developed in multiple languages, especially Spanish to provide better access. They need to be available in electronic and hard copy because in some remote areas, just delivering them online may not be sufficient.

Question six about partners, we believe this is a great opportunity to engage farm organizations, health organizations, health advocacy groups and the agribusiness community to stimulate the adoption and usage of materials. These groups have a common interest in helping develop the next generation. We can engage these organizations at all levels and the benefit will be we will have more support and folks at the grassroots level to help with implementation and support.

The use of social media, I think social media would be effective way to get resources out, but I think as we think about social media, that the partners going back to the previous question about how do we engage some of these partners can be effective and some of there's been advocates of this. We have discussions with some of our agribusiness partners. Many of them have expressed interest in being involved and supportive of this, and a lot of the support, I think, there'd be once we have materials to help provide resources and support of the local level for it, the local youths and adoption.

Thanks for the additional time and all of these comments will be expanded and submitted by the 26th. Thank you.

Additional comments:

This is Kent Schescke. I would like to add an additional comment related to second some of the comments that have been made in the last few minutes about -- it is to be a holistic approach and that one aspect of this is the instruction that we provide to young people. I would concur with Bill's statement about the need for -- I talked about personal development. I think his approach as well as how we are preparing and training the people through our preparatory programs to go out and be prepared to teach this -- that is important and also the approach talked about earlier in the testimony that really needs to focus on family and also the people who employ young people so they understand their role and responsibility in this as well. So, I think the whole idea that this is a holistic approach and if we do that, I think the idea, the deployment of this at a community level, creating more of a community focus, community safety mentality around agriculture is a way -- that way there is a role in all of this -- in this for all of the people whether they be employers, parents, young people, agribusiness, healthcare professionals, everybody sees a role in it and ideally, I think that is what is going to make it successful and we get as many people in the community focused and engaged around this decision -- around this issue.

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**William Field**  
**Professor**  
**Department of Agricultural & Biological Engineering**  
**Purdue University**  
**IN**

Thank you. This is Bill Field, Purdue University, representing the team involved with this effort with respect to the act of forwarded includes Doctor Brian French, Doctor Roger Tormoehlen, and a number of graduate students [who have] worked on this project. [Our] comments are going to be expanded in a written form and we will have those in.

Just to summarize, briefly, our first comment is that we hope we don't reinvent the wheel. There has been a substantial amount of investments made into developing new and consistent curriculum that is evidence-based and has been tested in the field with literally thousands of students. And, we believe we need to build on those efforts and not try to recreate those efforts.

Secondly, future efforts should be based on evidence-based and tested [methods]. I think that's an ongoing issue is that we continually reproduce what has been used for many decades without considering whether or not it is having an impact that we desire.

Number three, the target population should not be solely towards children and youth, it needs to be focused for the whole family. Children are at risk of the most horrible for injury but yet they have the least amount of power and decision-making power to make the necessary infrastructure changes to improve the safe work conditions that they have to deal with and so we need to especially involve parents in the full process and educate them as to the role the children should play in work settings.

Number four is the need to provide training for the individuals who are currently authorized to conduct the Ag HO training and that includes extension education educators and vocational articles and teachers across the country and, I would again agree with Kent, there is a need for uniformity and delivery of those systems. Each of those groups are different. They work with different formats, so we are going to have to explore how to best reach those two sets of instructors eligible to provide the certification that currently exist under the age provisions.

Number five - the need to explore impact that student credentialing has on this program. There are credential curricula that have been developed, credential opportunities for certification, but it hasn't generated an awful lot of interest from students. Until we get the systems in which students are engaged in such as the SAE program, or the 4-H program which actually receive a certificate of some kind that adds value to their employment opportunity, I don't think we are going to see much of an increase in participation in these programs.

Finally, it is our position that there is currently a comprehensive and effective Ag health and safety curriculum components other than can be used and provide a variety of supplemental resources. There is a need for gaps to be filled but again we don't think that needs to be reinvented but we believe what is lacking is a comprehensive, sufficiently funded and accessible delivery system that is reasonably accessible to the majority of the target population nationwide. There is currently lacking a national leadership for this field. We're not quite sure who is really responsible for mandating this program. Or, there is lacking of a legislative mandate to ensure accountability, continuity of these programs, quality control, a bill that provided structure. If you don't believe that there will come about much of a change with one or two short term funded products -- projects and [curricula?] -- there has to be a structural change in how we look at this program.

There is clearly a need to get buy-in from the following, including US Department of Labor, who actually is responsible for carrying out the enforcement of the Ag HO and workplace issues also US Department of Agriculture which is seemingly taking a leadership role and developing the educational components. Also, the land-grant system needs to recognize this as a whole. They should be involved at the highest level so that as part of their work plan, but of what they see as their core objectives, and also the agricultural education instructors across the country, FFA, not just that but they but the whole system of agricultural educators need to recognize that this is an important part. As we have observed throughout the country, many of agricultural education curricula are removing safety from their instructional components.

And, as we have done in a recent survey, the very few agricultural education preparation programs require safety instruction and preparation of teachers. This is a tremendous bullet that needs to be addressed.

I think I will stop there, other than pointing back one additional comment is that you need to really engage the parents in this process, and whenever we do [also] involve a group of decision-makers. Thank you.

Additional comments:

This is Bill Field again. I would like to clarify - I used the term vocational agriculture and I think Kent knows what I am talking about, that in the original language of Ag HO that referred to secondary teachers of agriculture, and that term is no longer generally used. I still like it personally, but there needs to be some point where that is clear. My references are basically to the original Ag HO's it is understood that applies to agricultural educators at the secondary level are engaged with teaching any agricultural courses that currently exist.

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**David White**  
**4-H Youth Development Specialist at Oregon State Univ.**  
**Director of the Oregon ATV Safety Program**  
**OR**

Good morning from the West Coast. I appreciate the opportunity to make comments, and my comments will be very brief summary of what my written statement will be.

I am a 4-H Youth Development Specialist at Oregon State University. I am also the director of the Oregon ATV Safety Youth Rider Endorsement program. My comments focus on work that is currently being done in Oregon to protect the health and safety of youth and adult and the process we have in Oregon is capable of being duplicated in other states. But, an Oregon State law requires all of youth under the age of 16 to have hands-on training or endorsement of their ATV riding skills, and to date the 4-H program through 31 4-H volunteers, temporary employees of the Sheriff's office, employees have gone with more than 1400 youth riding ATVs on public land. That has taken us to a point where we are in conversations with Oregon OSHA to reduce farm related ATV use, [introduce] hands-on training curriculum and we are in the process of bringing the curriculum now.

I think one of the challenges that Oregon faces, and many of the other states may face, in terms of putting together these types of programs is a source of funding that will make it possible for them to produce and/or training in the program. So this is a very short summary of what my comments will be but I do appreciate that opportunity, I certainly welcome the opportunity to talk to other people that may be interested in duplicating and ATV safety program in the state.

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**(Not sure of the speaker's name)**

I am a retired Ag teacher, but also am familiar with extension and here in New York we have a wonderful opportunity to work with these folks because everything is free of cost and where we specialize in working with agriculture students. We go on the farm, we work with 4-H groups, or schools that have active programs and in particular any of the formal mentioned programs or problems I have heard so far as far as teaching specifically animal safety to children, and of course the actual tractors and machinery we spend a lot of time with PTO's and rollovers and these things are out there, very much available to all of the ag programs and 4-H kids here in the state of New York.

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### **Kathy Fagan from OSHA**

This is Kathy Fagan from OSHA. I just wanted to let you guys know that there are five of us from the Department of Labor here, OSHA and also EPA and we have been very much enjoying listening, six of us, sorry, we have been very much -- taking lots of notes. Thank you.

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### **Connie Baggot Penn State University**

I am Connie Baggot Pennsylvania State University and I ditto the comments made by the national FFA director. I work with him quite a bit and his comments always are good and to the point. But, I would like to emphasize also that the high school secondary programs in high schools is a very important part of this education of students. And it is one way of educating the next generation about safety and safety concerns. I would think that in a proposal or comments would address the issue of including secondary agricultural teachers as well as extension educators as part of the entire process of educating our secondary school students, age wise. And as you know it is a formal program and this is one of the most efficient and effective ways of getting information out. And then, what these high-schoolers do is take this information back to their parents and hopefully make some changes in their farm operations to include safety. Thank you.

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### **Michael Pate**

This is Michael Pate. Thank you for allowing us the opportunity to comment on this very critical part in protecting youth, especially in agriculture. I would just like to comment that I would like to see in the RFA that a really big emphasis on multidisciplinary teams, especially those as agricultural engineers, those agriculture educators -- educators social sciences, behavioral scientist, those teams and vividly those that are connected with the land-grant university system that can reach out to extensions as well as the vocational agricultural teachers. So, I think that is

really critical to place emphasis on the multidisciplinary approach, especially those that can look at engineering as well as the social sciences and put together things that will affect the issues that have been brought forth today. Thank you.

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**Adam Davis**

Yes, I have a question regarding if this is related in any way to the proposed legislation from the Department of Health is the process, if this is a process leading to new legislation along the lines that it was proposed last year at this time?

NIFA/Aida Balsano: No. As far as I know, no.

Okay, thank you.

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