

Youth Farm Safety and Education Certification (YFSEC)
Stakeholders' Written Comments
December 2012

Cowley County FB - Denise Noonan-Middleton

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#3 - No

#6 - Local farm/ranch organizations, Extension, FFA and State YF&R and producers.

Also, this should not be a "mandatory" certification. Any increased safety instruction is welcome as there are now more and more people moving to the country that have no prior knowledge or experience of farm safety to share with their children, friends, etc....,

To: Farm Safety Comments
From: W.E. Field, Ed.D., Professor
R.L. Tormoehlen, PhD, Professor
R. French, PhD., Professor (Washington State University)

Date: December 26, 2012

RE: Input regarding the Youth Farm Safety Education and Certification Competitive Grants Program

We are pleased to provide input to the effort to enhance the Youth Farm Safety Education and Certification program (YFSEC) as authorized under Extension Activities, Smith-Lever 3(d) Programs. In addition to the following written comments, a summary of our comments were provided by Dr. W. Field during the listening session on 12/12/12.

Purdue University's Agricultural Safety and Health Program and the Department of 4-H and Youth Development have been engaged in developing, testing, and implementing educational resources and strategies that address the problem of youth injuries in agriculture for over two decades. During that time we have conducted local training that meets the requirements of the Agricultural Hazardous Occupation Order (AgHOs), conducted needs assessments of eligible instructors and program leaders, developed and tested new curriculum material that meets and exceeds the current AgHOs' requirements, conducted train-the-trainer programs involving approximately 500 eligible instructors nationwide, distributed curriculum material to over 8000 eligible AgHOs instructors nationwide and published research findings in over 10 peer review journal articles. In addition, with support from USDA-NIFA we developed a "one-stop" web site (www.agsafety4youth.info) that contains many of the resources needed to successfully conduct and document a youth safety program that meets AgHOs' certification requirements. This site has been widely promoted through direct mailings to all agricultural educators and county Extension offices in the US, along with media releases that have targeted farm families through the farm media. We believe this commitment to the safety of youth working in

agriculture places us in a unique position to address the questions included in the Federal Register, Volume 77, No. 227 published November 26, 2012.

Responses

#1 - Current educational gaps

The historical gap for up-to-date agricultural safety and health education and curriculum resources has been largely filled by the USDA-NIFA-funded resources developed by Purdue University and Pennsylvania State University that were designed to not only meet the current AGHOs' certification training requirements, but also reflect recent changes in agricultural production practices and current youth injury data. These efforts were largely in response to the priorities of the Youth Farm Safety Education and Certification Program (FSEC).

Questions have been raised about the need for additional emphasis on livestock safety, operation of ATVs and skid steer loaders and heat exposure. All of these topics are addressed in the current curriculum in general proportion to the level of risk. For example, there is greater emphasis placed on tractor rollovers because the current data indicates tractor operation results in more fatalities and serious injuries.

The most significant education and training gap that currently exists relates to the language of the AgHOs, now over 40 years old, and actual agricultural production practices now in use. For example, the AgHOs identifies specific curriculum topics that are no longer as relevant and fail to address new production practices that didn't appear as important at the time the AgHOs were drafted and implemented. For example the AgHOs fail to clearly address the risks of agricultural confined spaces, including grain bins, and does not recognize the hazards associated with skid steer loaders and ATVs. It is our judgment that the recently developed curriculum material from Purdue University and Pennsylvania State University not only full meets the original minimum training requirements of the AgHOs, but exceeds them by addressing more recently identified hazards. We see no need to embark on new curriculum development efforts, but rather a need to place a greater emphasis on broader dissemination and utilization of the current resources, and additional surveillance of the student knowledge gains. Ongoing assessments are needed to demonstrate that competency-based instructions can have an impact on reducing the frequency and severity of youth injuries associated with agriculture.

#2 – Critical components of a coordinated approach to Agricultural Safety and Health Education

With respect to the critical components of an effective agricultural safety and health education program that meets the minimum requirements of the AGHOs and contributes to developing the minimum core competencies of youth employed in agricultural production, the following should be considered:

- 2(a) Recognition that not all youth are physically, emotionally, or intellectually prepared to be exposed to the typical hazards found in agricultural production workplaces. Programs or certification processes that fail to recognize this fact do no service to the youth participating in them. Failure to successfully complete a certification course should be seen in some cases as a success of the program.
- 2(b) Certification and youth safety training programs need to utilize an evidence-based curriculum that has been designed and tested to meet and exceed the minimum requirements of the current AgHOs and reflect current knowledge of youth-related injuries in agriculture. The evidence is clear that a wide variety of programs are currently being offered across the country that do not meet the minimum requirements of the AgHOs and have not been shown to address the most critical hazards facing youth who are employed in agriculture.

- 2(c) Agricultural safety and health education, to be effective, must be offered or supervised by competent instructors who are adequately trained to know the required training provisions of the AgHOs and general agricultural safety and health work practices, and demonstrated ability to communicate with the target population. Currently there are no competency-based standards for instructors/educators who conduct or supervise AgHOs' certification training.
- 2(d) Curriculum support services are needed to assist eligible AgHOs certification training instructors with issues related to program conduct including curriculum selection, instructional methods, and student assessment. This has been one of the roles of the www.agsafety4youth.info developed at Purdue University along with a supporting toll-free line. These services are now only partially available due to a lack of funding.
- 2(e) There is a need to establish and sustain a federally-recognized instructor certification process that establishes a certain level of accountability for those who conduct agricultural safety and health education designed to meet the minimum requirements of the AgHOs.
- 2(f) Parental involvement is critical. Program content should address both the role of the youth engaged in agricultural production activities and the parent who is generally the key decision-maker in determining the tasks to be performed. The overwhelming majority of fatal injuries to youth in agriculture occur on family farms where the parent is the primary supervisor and the farm is exempt to both the AgHOs and the OSHA workplace safety and health standards. Programs should target both youth and parents.

#3 – Need for a one-stop-shop for educational resources

Currently, there are two online sites that specifically address agricultural safety and health education for youth (Purdue and Pennsylvania State University). The site at Purdue (www.agsafety4youth.info) was supported by USDA-NIFA and includes both the Purdue and Pennsylvania State University resources. Funding to maintain and promote www.agsafety4youth.info ended 9/31/12, but Purdue has been committed to keeping the site active and respond to inquiries, which continue to come in. These efforts should not be duplicated, but rather sustained due to the time it takes from implementation to adoption. In addition, resources are needed to continue to update current sites and to promote their use.

Consideration should be given to:

- 3(a) Recent investments by USDA-NIFA and internal sources on existing sites.
- 3(b) Different training needs of eligible instructors (agricultural educators vs. Extension educators).
- 3(c) High turnover of eligible instructors estimated to be as high as 20-25% per year. The need for ongoing, online instruction (webinars) is substantial.
- 3(d) Low density of both eligible instructors and target youth population.
- 3(e) Short duration that youth are in the target population (14-15 for AgHOs) (12-17 from risk perspective)
- 3(f) Linking existing sites with other relevant sites, such as the National FFA Curriculum site and extension.
- 3(g) There are few examples where just one site or organization has been effective at addressing a broad rural issue without sustained support. One model to consider is www.agrability.org that has been in operation for over 15 years and has become widely recognized as a primary resource on issues related to farming with a disability.

#4 – Educational standards

As part of the development of the Purdue University's Gearing Up 4-Safety curriculum, educational standards for both youth participants and eligible instructors have been identified and validated using recognized educational testing methods. The results were peer-reviewed and published. These standards for minimum core competencies should be given careful consideration and adopted as a base for conducting agricultural safety and health education for youth.

#5 – Improve outreach to vulnerable populations

The Purdue University Gearing Up 4 Safety curriculum was tested with two vulnerable under-served populations of youth – those with limited English-speaking skills and Black youth in the south. Difficulties were found reaching both groups, but test scores indicated that significant knowledge gains occurred with both. The most significant barriers were not related to the curriculum, but rather identifying instructors committed to conducting the training who recognized the unique learning needs that each group had. USDA-NIFA-sponsored initiatives at Purdue to reach these populations proved problematic due to the lack of youth involvement in organized educational programs, such as 4-H, FFA, and vocational agriculture, low population density of interested youth and high mobility of target population. It is also believed that reaching these populations will prove to be very costly and difficult using electronic means.

#6 – Beneficial partners for curriculum development

As noted above, we believe the educational resources currently exist for conducting effective agricultural safety and health education. There is a need for complementary resources that address specific topics or relate to regional differences. These resources could be in print, online, or video formats and be made available electronically.

Partnerships are needed to develop these resources and meet the quality expectation of youth. Partners could include agricultural equipment manufacturers, commodity groups, farm organizations and the NIOSH-funded Agricultural Safety and Health Centers.

More significant "buy-in" is also needed from the following:

- 6(a) US Department of Labor to enforce the current AgHOs and update them to reflect current agricultural work practices based upon actual fatality and injury data and with consideration given to current experiential learning opportunities through 4-H and FFA. The issue of certification authorization needs to be solved and supported.
- 6(b) USDA-NIFA to expand resources through Smith-Lever 3(d) Programs to ensure a greater Land Grant involvement in conducting AgHOs certification training and to allow for greater accountability. Funding needs to be specifically earmarked for agricultural safety and health education that meets the provisions of the AgHOs
- 6(c) 1862 and 1890 Land Grant Institutions to recognize their responsibility to address the AgHOs' certification training and youth safety needs at the same level as afforded the Pesticide Applicator Certification Training conducted nationally by Land Grant Institution staff and largely supported by fees charged to participants.
- 6(d) Vocational Agriculture and FFA to fully recognize that a young person being prepared to pursue a career in agriculture without adequate knowledge and training on compliance with safe and healthy work practices is ill-prepared to work in an increasingly regulatory-compliant environment.
- 6(e) Teacher/educators of agricultural education. A recent Purdue University survey of key university programs preparing teachers of agricultural education found little attention to agricultural safety and health, including both issues related to production agriculture

and laboratory safety. We believe most graduates leaving these programs are ill-prepared to effectively incorporate agricultural safety and health into their secondary agriculture programs.

- 6(f) As noted above, parents are a critical component to enhancing the effectiveness of agricultural safety and health education. More “buy-in” is needed from parents, especially those with children exempt from AgHOs compliance.

#7 – Educational approaches

There is no evidence to show that any one educational strategy is most effective at meeting both the educational/knowledge and skills requirements of youth to work safely in agriculture. Developing the necessary knowledge, skill, behaviors, and attitudes require a complex approach involving early parental guidance and supervision, career orientation, skills training and ongoing supervision, reinforcement, correction, and rewards.

Online educational opportunities such as those offered by Purdue University and Pennsylvania State University provide important efficiencies, but cannot be expected to replace the need for skill development under the supervision of a skilled parent, instructor, or employer who is committed to the well-being of the young learner. In fact, the “non-observational” approach suggested by the online process does not meet the current minimum provisions of the AgHOs.

It appears to us that the greatest number of youth can be reached under the existing umbrellas of secondary agricultural education programs, complemented with FFA support (over 500,000 enrolled) and 4-H programs offered in nearly every county in the U.S. Outreach to underserved and vulnerable populations of youth will need to be customized to meet their unique needs and be supported by new sources of funding.

The impact of national credentialing of youth to work in agriculture, including a component on safety, should also be considered.

Thank you for the opportunity to provide this input.

Adam Davis

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Response to Q1:

- Where do youth go for current farm safety education? In NY State, there are almost no programs that teach youth to be safe on the farm. Starting at legal employment age is way too late. Youth are driving tractors and operating farm equipment way before they are old enough to become employed.
- Standardized Tractor Safety Course - structured the same for every county in the state Farm Animal Handling tractors, animals, electrical, weather, equipment, chronic diseases and hearing.
- Money is tight. Associations or schools who are implementing a safety program need to have access to funds to help sustain these programs. Many CCE associations across NYS don't provide

such a training--how can these gaps be addressed because there certainly is a need for the course.

Response to Q2:

- Starting with the youngest children. Farm kids are working from the day they can walk. Teaching kids to be safe around machinery, farm equipment, animals etc. will have an impact that lasts for generations.
- Standardization!!!
- Series with different focus for each and time to collect a certificate.
- Having a variety of instructors who are educationally sound in specific areas. Such as: Ag teacher, dairy farm tour, crop farm tour (to address pesticides, hay storage, other hazards), equipment dealership to discuss newly updated farm equipment, BOCES center to provide hands-on learning/practice with live equipment.

Response to Q3:

- NO! One stop approaches can never address specific needs. Many factors affect the specific needs including the type and size of farms, geography, culture and others. One size never fits all and usually fits noone.
- Yes.
- This always makes it easier to find and follow up.
- Yes.

Response to Q4:

- Best practices that are both realistic and research based.
- Emphasis on the practical.

Response to Q5:

- Include farm safety in migrant educational programming.
- Money, grants to help associations coordinate such a program.

Response to Q6:

- Equipment manufacturers and dealers, insurance companies, cooperative extension and FFA, farm supply companies, including retailers, feed and fertilizer manufacturers and dealers, vets, equipment dealers, parents, CCE, community colleges with ag curriculum, BOCES, schools, equipment dealerships, farms, police and fire safety personnel.

Response to Q7:

- Youth should be involved in development of any social media campaigns that target other youth.
 - Use as many as you can.
 - I think resources could be posted on social media, as well as the advertisement of classes-- however, you still need hands-on experiences/opportunities for youth.
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Dear Sir or Madam:

On behalf of the Pennsylvania Farm Bureau (PFB) and nearly 56,000 farm and rural family members, we appreciate the opportunity to offer the following comments in response to the above-titled matter. PFB supports farm safety education and training of youth living on and those actively working on farms.

Pennsylvania agriculture represents over 58,000 farms and remains the state's largest industry with an economic impact of more than \$5.5 billion annually. More than 99 percent of our farms are family-operated businesses.

PFB generally supports the established criteria and the curricula developed through the YFSEC program; however, we believe that the creation of a mandate for all programs to follow curriculum or guidelines would be detrimental to many of the local programs already in place. Local programs address unique and specific needs and differences in the types, sizes and scope of farming business and the people working and living on farms.

We believe agricultural diversity and regional differences among farms within states and across the nation make standardizing of educational programs as one size fits all to be problematic, and may be less effective than many local farm safety initiatives that recognizes those unique needs, like farm sizes, commodities produced, and local knowledge of needed outcomes and how to best influence the local safety culture.

As an example Pennsylvania and several other states have large "plain-sect" or Amish and Mennonite farms and farming communities. The farms represented within those communities have their own unique needs, and are often not socially connected outside of their immediate circle of religious or community contacts. They do not use most modern communications and technology, and run their own schools following religious principles that differ from public school teaching and programs.

The Penn State Cooperative Extension has developed programs and established relationships with these communities within Pennsylvania that have crossed barriers, allowing outreach and acceptance of farm safety education among their schools and children. Extension's outreach programs are having an increased impact in these communities, even in areas of CPR, first aid training and important inroads to many aspects of workplace safety.

Adaptability of programs of qualified state and local organizations, such as Penn State Extension's, to respond more directly to local needs and demographics of farmers will, in our opinion, provide a higher level of acceptance and active implementation of safety measures on farms than a single nationally driven or mandated program. Additionally, we concur with the comments provided by the American Farm Bureau Federation.

We are providing answers to several questions specifically posed by the NIFA Information Request:

Question 1:

What are the current educational gaps in agricultural safety and health education that could be addressed through this program?

Many of the farms in Pennsylvania are as outlined above, owned and operated by plain-sect religious families that are not socially connected and do not utilize computers, or the Internet. Increased efforts by USDA to facilitate programs that more tailored to the needs and customs of local farming communities have greater potential to improve the safety of farm children and farm families. The children in these communities have strong parental involvement. Programs that focus on these strong family relationships will more likely instill implementation of safety activities that the entire family will participate and reinforce among family members.

Tractors remain the primary source of injury and death on farms. Pennsylvania and other Northeastern states have a large number of older tractors in use that were manufactured before many of the modern safety equipment became included on a new tractor. This poses an important area of concentrated effort to educate both the farm owner and the operators of tractors for all ages about the importance of installing, using and maintaining safety add-ons (Roll Over Protection Structures known as ROPS, and seat belts) on equipment where needed.

USDA could incorporate some of the information and resources available through NYCAM, Penn State Extension, and state Farm Bureaus, to expand the knowledge base of the instructors and students about these and other safety resources.

Question 3:

Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?

There is already an effort to create a one-stop-shop through Land Grant Universities. Pennsylvania Farm Bureau does not have specific policy in this area but generally support initiatives such as those by Pennsylvania State University to improve access to and quality of farm safety materials and information. We do have concerns that any “one-stop” effort not overshadow or replace locally based and developed education and training programs. We strongly believe these programs are working, and address local issues and unique differences in farms and farm operations as described above.

Question 5:

What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?

PFB supports the development and use of multi-language training materials. Some current programs are not yet available in languages other than English. Programs should be prioritized according to importance and incidents of accident or injury exposure, for translation and reproduction.

Train the trainer materials could also become more available at the farm level for farm owner use as on farm training aids when new employees are initially hired or start a new farm task.

Question 6:

What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?

We reiterate American Farm Bureau’s statement of support of utilizing farm organization and educational associations that have direct experience with youth workers on the farm. This direct, first-hand experience is critical for developing objectives and curriculum that understands the unique nature of agriculture.

Question 7:

What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?

Advanced technologies can provide young farm family members and hired workers an additional resource to receive messages about safety. Social media and its connection with younger students could be utilized as a powerful tool using a culturally accepted method of communication and message delivery to change the safety culture of young farm workers.

USDA must also recognize the gaps in service for high speed Internet in many rural areas, which continues to be a hurdle for delivery of these types of educational materials and training efforts. Using existing programs like Quiz Bowl's and county fair activities that deliver programs to large numbers of youth and improving them using new technologies at those events along with training and educating the local networks that operate these efforts in their use outside these events could also go a long way toward expanding farm safety efforts.

Thank you for the opportunity to comment. Please feel free to contact us if you have any questions or need additional information on any of the discussion above.

Sincerely,
Carl T. Shaffer
President

Joshua Bledsoe, State Agricultural Education Leader

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1. *What are the current educational gaps in agricultural safety and health education that could be addressed through this program?*

Safety: As farms have increased in overall size so too has the size of equipment while its operational functions have intensified.

Training on the needs created by this change might be one area of focus. Another training area that could benefit would be regarding safety procedures for any and all agricultural education related projects. Perhaps this program could support the development of curriculum to include such safety procedures.

Student safety training can be a part of the curriculum instructional component for students' supervised agricultural experience projects. Summer workshops would provide a good opportunity to provide instruction for teacher development and student safety.

Health: Farm families often overlook the importance of healthy diet and regular exercise. Farmers often believe that because of the physical nature of their work that they don't need regular daily exercise. During busy periods such as planting or harvest it is also easy to neglect the importance of a proper diet.

2. *What are the critical components of a coordinated approach to Agricultural Safety and Health Education?*

A coordinated approach to Agricultural Safety and Health Education starts when potential agricultural education students and extension agent are in their undergraduate studies. Education is vital at all levels. However this program needs to compliment the current structure and system for high school agricultural education students. Finding ways to fit into the current model (agricultural education courses and the National FFA Organization) and not trying to work outside of existing the agricultural education delivery system will be critical. Utilizing partner resources will also prove beneficial to make the program successful and create buy-in from multiple agencies and organizations.

3. *Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?*

There are some sources that provide different materials on a variety of safety and health related topics; however, others are more specific to that company or organization's product or service and geographic area. A one-stop-shop is a good concept as long as it allows flexibility for individuals at the local level to have the ability needed to handle specific issues native to that area.

4. *What educational standards should be considered in development of the curriculum?*

Educational standards should be designed in a manner by which educators can incorporate them into their required curriculum. It should be easily integrated for learning by direct application.

5. *What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?*

Provide training and information available in the language of the intended audience whether it is verbal or written communication.

6. *What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?*

Agricultural Education Teachers/FFA Advisors, 4-H Leaders, Cooperative Extension Agents, agricultural college faculty, and agribusinesses specifically farm machinery companies.

7. *What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?*

Approaches that involve hands-on activities for learning by application and use of technology such as authentic computer games and simulations are needed approaches for young workers. Complimenting that message through the use of an online delivery model coupled with social media would be a positive approach as well.

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To Whom it May Concern:

The California Farm Bureau Federation (CFBF) appreciates the opportunity to comment on the above-titled matter, the agency's notice to gather stakeholder input on the Youth Farm Safety Education and Certification (YFSEC) program focus and priorities for agricultural safety and health education.

CFBF supports the education and training of youth actively working on agricultural operations. We want to ensure that this does not become a mandated curricula and that a Certificate of Completion is not required to work on a farm or ranch or to participate in youth activities, specifically working with and showing animals through involvement in 4-H and FFA. Other training programs developed by qualified private organizations should also be recognized and used. California state agencies and CFBF have successfully developed and distributed a number of voluntary safety training programs throughout the state. We suggest specific nondiscriminatory language providing that an employer shall not discriminate against an applicant due to the lack of certification. Having the next generation safely work on the farm is an important part of passing down the farming tradition.

Questions posed by the NIFA Information Request:

1. What are the current educational gaps in agricultural safety and health education that could be addressed through this program?

CFBF has no comment on this question.

2. What are the critical components of a coordinated approach to Agricultural Safety and Health Education?

To make the training effective it's important to identify the issues we want to address. These should be identified by looking at what specific types of on-farm incidences we want to reduce from occurring. Materials can then be developed that both speak to the issue, audience, demographic and learning style. If the audience is youth there may be other ways of reaching them other than through agricultural employers but through schools, social media, advertising, etc. Programs should be targeted to those regions where there may be a greater number of incidences. In California, the California Occupational Safety and Hazard Agency developed "99calor - water, rest, shade" (<http://www.99calor.org>) to build awareness on heat illness. It has been targeted to those areas where the temperatures can get high in the state.

3. Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?

Once the areas of the biggest concern have been identified, a set of program materials can be developed and accessible through one central point. California Occupational Safety and Hazard Agency has developed a number of programs including training of employers, supervisors and foremen that are utilized by many organizations. Program materials can be further refined, if necessary, to speak to the targeted demographic and/or regional and commodity differences.

4. What educational standards should be considered in development of the curriculum?
CFBF yields to those more involved in the educational process for answers to this question.

5. What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?
We support the development of educational program in those languages that are predominately spoken in the state or region. Currently, several programs have been developed in Spanish and other languages, including visual training aids and posters which can be very effective. This outreach needs to expand to ensure all youth have access to the training materials.

6. What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?
We support utilizing farm organization and educational associations that have direct experience with youth workers on the farm. This direct, first-hand experience is critical for developing objectives and curriculum that understands the unique nature of agriculture.

7. What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?
It is critical to use available technological advances, especially social media, to reach this target audience. Young workers are constantly connected through social media and by advertising on those outlets we will have access to highest population. However, it is important that the messaging is accurate and from reliable sources. Additionally, local opportunities, such as a schools and county fairs, allow access to a targeted audience.

Thank you for the opportunity to comment.
California Farm Bureau Federation

The following comments represent the views and opinions of the members of Illinois Agriculture Education. The comments were received from the leadership organizations and individuals representing 29,000 students, 312 secondary agricultural education teachers, teacher Educators from 4 universities and 10 State Agricultural Education Staff members.

Submitted by

James Craft

Executive Secretary - Illinois Association FFA

Executive Director – Illinois Association of Vocational Agriculture Teachers

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The Agricultural Education Community in Illinois is pleased to submit the following thoughts and proposals in response to the *“Solicitation of Input From Stakeholders Regarding the Youth Farm Safety Education and Certification Competitive Grants Program.”*

Agricultural educators across Illinois are deeply committed to preparing students for careers in the agriculture industry through rigorous classroom instruction and experiential activities outside the classroom. Many of those experiential activities include entrepreneurial, placement and research activities that allow a student to explore and or become established in an agricultural career.

While we have business agreements and emphasize safety in all of those experiential activities, we wholly support initiatives and programs that would assist our teachers in better serving their students. The possibility of establishing a certification program that demonstrates to an employer that a student has met a specific level of expertise that will better insure their safety would be well received by Illinois Agricultural Educators.

In the solicitation for input, seven specific questions were asked. After consulting with educators in industry, secondary and post-secondary education and with partners in the state agencies we would submit the following as an Illinois perspective:

Question 1: What are the current educational gaps in agricultural safety and health education that could be addressed through this program?

Answer 1: Safety has a strong emphasis within many of our agricultural literacy efforts that are focused on elementary students. Safety has a strong emphasis in the secondary agricultural education classroom on topics ranging from livestock handling, to equipment operations, to chemical handling, and all are important. Additionally, there are instructional units on science lab safety in agriscience courses and shop safety courses for agricultural mechanics. Prior to entering the Agriscience laboratory or Agricultural mechanics shop students are typically required to pass a safety exam. However, those safety exams are not necessarily standardized. Additionally, while safety is critical to the experiential activities outside the classroom, teachers lack a standardized test to evaluate a student's understanding of safe practices. A series of standardized tests along with a curriculum to assist the teacher in preparing lessons would be of value to many teachers, as it would insure the information being taught meets current industry practices and would reduce the duplication of effort when teachers at different schools spend time developing similar test, over similar information and for a similar purpose.

Question 2: What are the critical components of a coordinated approach to Agricultural Safety and Health Education?

Answer 2: In order to establish a coordinated approach to Agricultural Safety and Health Education there are three critical components: human resources, educational resources, and competency testing. Creating a safety consciousness among teachers, employers, parents and students is a critical first step. Secondly, providing resources to prepare, present, and test students on agricultural safety competencies would be very valuable. Thirdly, the resources should apply to and test student knowledge in relation school-based laboratory instruction and work-based learning scenarios.

Question 3: Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?

Answer 3: Yes. A centralized source for educational materials would be very helpful. In some areas there is a lack of easily accessible materials to provide training on and promotion of agricultural safety and health. A centralized source that reviewed the instructional materials and then provided a central site for teachers, employers, parents and students to access training materials on safety and health would have several advantages. A) Materials could receive an endorsement, similar to an Underwriters Laboratories label on electrical equipment. B) Trainers would have access to materials touching on all facets of agricultural safety without any doubt as to the accuracy of the materials. C)

Warehousing the materials at a central site...whether at a physical location or a web site....makes a lot of sense.

There are several partners that could assist in marketing and/or promote the materials if found at a central site. Those partners could include for-profit curriculum vendors, not-for-profit organizations, educational and governmental agencies.

If implemented the materials should include materials that address the potential school-based or work-based safety concerns encountered by secondary agriculture students.

Question 4: What educational standards should be considered in development of the curriculum?

Answer 4: Standards exist in the “National Agriculture, Food and Natural Resources (AFNR) Career Cluster Content Standards” and in the “National Quality Program Standards for Secondary (Grades 9-12) Agricultural Education” that were developed through the National Council for Agricultural Education, Common Core Academic Standards. They should be reviewed and expanded as necessary to encompass standards from E.P.A. (worker protection standards), as well as Occupational Safety & Health Administration and Hazardous Occupations Order for Agriculture regulations that have not been included in the standards developed by the National Council.

Question 5: What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?

Answer 5: While some extension and Agricultural Education programs serve ESL students that service meets with mixed results. Children whose parents are part of a migrant workforce tend to be less served by the transient nature of the workforce. While the children may be enrolled in the public school the fact they change schools during the middle of a school year interrupts their education. It may be possible for schools for schools to provide safety programs for the parents of the students who may also be working in the Agriculture industry. Developing a connection to the migrant workforce requires a collaborative effort between state and federal departments of labor and the state and federal departments of educations. That collaborative effort must include a partnership with local schools where the migrant workforce is in residence. Sharing of information must become more open if the lack of service is to be resolved.

Question 6: What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?

Answer 6: The list of potential partners is far too lengthy to completely identify in this comment. Those that readily come to mind include:

- National FFA Organization (including students)
- National Association of Agriculture Educators
- National 4-H (including students)
- National Association of Extension 4-H Agents
- American Farm Bureau
- National Safety Council
- Representatives from the Insurance industry
- Representatives from Occupational Safety and Health related institutes

Question 7: What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?

Answer 7: There are numerous approaches that could be used to get this message out more effectively and to a wider audience. Some things that come to mind first are to model existing programs such as an ATV Safety or Safe Hunting Training courses. This would be a certification program consisting of a virtual safety simulator*, a certification test, and an in person driving course of some sort to ensure that youth have a knowledge of the dangers and how to be safe when working with equipment. In addition to this course, a series of refresher courses (yearly or semi-annually) would be used to require students to stay up-to-date on safety practices and to regularly reinforce the importance of safety.

Other things that may be able to be used are phone apps or FaceBook® pages. These methods would help by keeping new information in front of people as a constant reminder to be safe when working with equipment or other dangerous jobs in the agriculture industry.

**It was suggested that the online gaming used by the U.S. Army be used as a model to develop a student skills in safety.*

These comments are presented on behalf of the Illinois Agriculture Education community and are a synopsis of the input received from the representatives of agricultural education students, secondary agriculture education teachers, university staff, and state education staff.

Thank you for the opportunity to present our thoughts. We are supportive of this approach to insure the safety of our youth. Illinois Agriculture Education will be a willing partner in the development, professional development activities and distribution of materials that arise from the project under discussion.

Respectfully submitted,
James Craft

Kent Schescke, Director of Strategic Partnerships, National FFA
1410 King Street, Suite 400
Alexandria, VA 22314
(703) 838-5883

A written copy of the comments presented at the stakeholder input session.

Thank you for the opportunity to provide comments. In my role as Director of Strategic Partnerships, I work closely with USDA and other government agencies. I appreciate the opportunity to provide comments on behalf of school-based agricultural education programs (of which FFA is an integral part) across the country. Today there approximately 800,000 students grades 7-12 enrolled in agricultural education program.

A critical component of our agricultural education programs is the opportunity for students to learn through hands-on work experience in an agricultural setting. We often refer to this program as Supervised Agriculture Experience (SAE). Many of our students especially those in the first two year (and often under the age of 16) receive their experiential learning experience through placement in

agricultural production. The onsite work supervision of these students is provided by the employer and periodic supervision and visits by the Agricultural Education instructor.

The primary purpose of SAE is to provide the student the opportunity to put to practice the knowledge and skills they are learning in the classroom and laboratory. SAE provides the real world application of that knowledge and skills and helps reinforce the education gained by the students. An important part of this knowledge and skill development is ensuring the safety of the student worker. Our teachers care deeply about their students and want to make sure they have the proper preparation including workplace safety education.

We applaud efforts of Secretary Vilsack and the work being done by USDA and specifically NIFA increase the quality, effectiveness and utilization of safety education resource for Youth working agriculture.

1. What are the current educational gaps in agricultural safety and health education that could be addressed through this program?

One of the major gaps that exist is that while there are a number of resources available related to machinery and grain bin safety there is very little available that addresses other safety areas such as livestock, and other areas of agricultural production. While the discussion this past year has focused primarily about Youth working in farm safety we see the need to broaden these resources to include other agriculturally related career pathways. Many of these pathways would include on farm placement and we would like to see them organized so that our students and teachers can fully appreciate the importance and relevance to them. These pathways include Agribusiness Systems, Biotechnology Systems, Environmental Services Systems, Food Production and Processing Systems, Natural Resources Systems, Plant Systems, Power, Structural, and Technical Systems.

Having this broad approach provides the opportunity to work with all students regardless of their SAE type to ensure that Youth Safety education is an integral part of their educational experience.

2. What are the critical components of a coordinated approach to Agricultural Safety and Health Education?

- 1. Quality Instructional Resources-available both in synchronous and asynchronous formats for adaptation to many educational settings*
- 2. Reliable Assessment Tools-correlated to the instructional resources and help assess the students' knowledge, skills and readiness to perform work in these areas*
- 3. Student Credential and or Certification Opportunity-This is an important part that will help with the adoption and utilization. If the credential can be connected with an assessment which includes both written and authentic assessment of the students' knowledge, skills and ability.*
- 4. Program Evaluation-there needs to be an evaluation of the effectiveness and usage of these resources. This should also allow for periodic review and updates as needed.*
- 5. Professional Development Support-to ensure the proper use of these resources by teachers, youth extension agents and volunteers there needs to be tools that help train the teachers so that they are administered in a consistent and reliable form.*
- 6. Voluntary-We would like to see this program voluntary and not mandatory.*
- 7.*

3. Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?

It would be very beneficial to have all of these resources centrally located so that teachers, students, parents and employers can find and use. This would also allow for the aggregation of supplementary resources that may be useful to teaching. This would help insure that all of the materials, resources and tools are consistent in their format and design. We would also like to see this develop into a clearing house for safety related resources that would utilize key word search and other tools to help guide users to what they are looking for or needing.

4. What educational standards should be considered in development of the curriculum?

The educational standards that these resources should connect to are

- A. *The Agriculture, Food and Natural Resources Curriculum Content Standards developed by the National Council for Agricultural Education. These standards are used by individual states to develop their state specific content standards for agricultural education*
- B. *The Common Career Technical Core Standards. These standards are being developed by the National Association of State Director of Career and Technical Education consortium*
- C. *The Common Core State Standards-being developed by the National Governors Association and Council of Chief State School Officers. These standards have adopted by 40+ states across the country.*

5. What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?

These resources need to be developed and delivered in multiple language formats, especially Spanish, to provide better access to vulnerable populations. These materials should be available in both electronic and hard copy to ensure even in remote areas that they are accessible.

6. What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?

We believe this is a great opportunity to engage farm organizations, producer organizations and the agribusiness community to stimulate the usage and adoption of the materials at the local level. All of these groups have a common interest in the development of the next generation of agricultural producers and workers. By engaging these organizations at the national, state and local level we have the opportunity to involve them in a coordinated way with grassroots implementation and support.

7. What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?

As I stated earlier these resources need to be made available online and formatted for use in a classroom setting as well as for an individual student learner outside the classroom setting. Even in our programs given the diversity of student' interests and SAE, the utilization of these materials would in many cases be done as an individual learning activity.

Social media, web and other electronic means could be utilized to make students, teachers, parents and employers more aware of their existence and intended use. This also provides an opportunity to magnify the message and outreach through the partner organizations described in question #6.

Thank you for the opportunity to provide input into the grant development process. We look forward to continued cooperation and involvement in this development process. Please feel free to contact me if you have questions or need clarification to any of the comments I have shared.

Cristina De La Rosa
cristinad@fb.org

To Whom it May Concern:

The American Farm Bureau Federation (AFBF) appreciates the opportunity to comment on the above-titled matter, the agency's notice to gather stakeholder input on the Youth Farm Safety Education and Certification (YFSEC) program focus and priorities for agricultural safety and health education.

AFBF supports the education and training of youth actively working on agricultural operations. We generally support the established criteria and the curricula developed through the YFSEC program; however, we want to ensure that this does not become the mandated curricula and that other training programs developed by qualified private organizations are also available.

Additionally, we want to ensure this remains a voluntary program and that a Certificate of Completion be not required to work on a farm or ranch or to participate in youth activities, specifically working with and showing animals through involvement in 4-H and FFA. Moreover, we suggest specific non-discriminatory language providing that an employer shall not discriminate against an applicant due to the lack of certification.

Questions posed by the NIFA Information Request:

1. What are the current educational gaps in agricultural safety and health education that could be addressed through this program?

AFBF has no comment on this question.

2. What are the critical components of a coordinated approach to Agricultural Safety and Health Education?

One critical component of a coordinated approach to agricultural safety and health education is knowledge of pedagogy and andragogy in order to develop material that meet the learning styles and age level of the learners. It would be helpful to have an agreed-upon list of learning objectives similar to the scope and sequence developed for social studies curricula.

3. Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?

While we believe it may be beneficial to have central access to information, we do not believe a one-stop-shop is necessary, nor beneficial to create the education and program materials. It is in the best

interest of the youth receiving the training to have locally based training programs and materials catering to region and industry specifics. Agriculture is extremely diverse with very distinct commodity and regional differences. A national one-stop-shop creating universal materials will not be able to provide the level of detail necessary to make the training effective.

4. What educational standards should be considered in development of the curriculum?

AFBF yields to those more involved in the educational process for answers to this question.

5. What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?

We support the development of educational program in multiple languages. Currently, several programs have been developed in Spanish and would encourage development of curriculum in other languages as well, including visual training aids and posters. This outreach needs to expand to ensure all youth have access to the training materials.

6. What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?

We support utilizing farm organization and educational associations that have direct experience with youth workers on the farm. This direct, first-hand experience is critical for developing objectives and curriculum that understands the unique nature of agriculture.

7. What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?

It is critical to use available technological advances, especially social media, to reach this target audience. Young workers are constantly connected through social media and by advertising on those outlets we will have access to highest population. However, it is important that the messaging is accurate and from reliable sources. Additionally, local opportunities, such as a school setting or during county fairs, allow for easy access to participation.

Thank you for the opportunity to comment.

American Farm Bureau Federation

Barbara Lee, PhD

National Children's Center for Rural and Ag. Health and Safety

lee.barbara@mcrf.mfldclin.edu

Ph: 1.800.662.6900 or 715.387.9182 (w)

New Cell Ph: 715.223.7893

Thank you for the opportunity to comment on the Youth Farm Safety Education and Certification (YFSEC) competitive grants program. We commend USDA for its willingness to seek stakeholder input prior to renewing its competitive grants program. As support for our statements, let us provide a little background:

- Since 1997, our Center has been funded by the National Institute for Occupational Safety and Health (NIOSH) to conduct research, to evaluate interventions and to offer technical assistance to individuals and organizations addressing safety for children living, working on, and visiting our nation's 2 million farms.
- Our Center led the development of the first National Action Plan for Protecting Children in Agriculture, issued in 1996, and then updated that plan in 2001. This past April, we released the *Blueprint for Protecting Children in Agriculture: The 2012 National Action Plan* which acknowledges successes and remaining challenges.
- Our Center led the consensus-driven development of the North American Guidelines for Children's Agricultural Tasks known as NAGCAT. Research has shown that, when used by farm parents, the NAGCAT guidelines reduce childhood injuries on family farms by 50%. Subsequently, we led the development of safety guidelines for hired adolescent farm workers that included labor regulations.
- Our Center does not provide direct educational programming to the farming community. Rather, we generate and test guidelines and strategies to be adopted by others, such as Cooperative Extension specialists, agriculture educators, child safety advocates, and clinical providers.
- Our work and the strategies we promote consistently rely on principles of child-development, behavioral theory, public health approaches, and risk management.

Your Federal Register notice posed seven questions for us to address. Rather than respond to each question, we will share several observations then state three specific recommendations. Facts and principles to be considered include:

- Nonfatal childhood injuries from nearly all causes are declining, while work-related deaths on farms remain high.
- 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 childhood farm safety programs are squarely aimed at and for youth.
- Children and youth are rarely empowered to institute basic safety steps such as purchasing personal protective equipment (e.g. steel-toed shoes), installing rollover protection (ROPS) on tractors, or repairing machinery and structures associated with the most horrendous injuries.
- For youth, the focus must be on eliminating their participation in hazardous work, not on training them so they can do hazardous work at younger ages.
- Over the past two decades there have been hundreds of farm safety programs developed and delivered to children. It is unlikely we need to develop any new curricula from scratch, unless it will be directed toward parents, farm owners, and employers responsible for protecting young workers.
- Some farm safety programs are based on the premise that young workers' behaviors and judgment can be altered with training, however, child development is hard to accelerate. Agricultural work must be matched to a child's physical, cognitive, social and emotional development in order for it to be a safe and positive experience.

- Any type of certification training must be grounded with basic agricultural safety principles, such as requirements for tractors with ROPS and seatbelts, valid drivers license for operating on public roads, and machinery guarding.

Given the experience of our NIOSH-National Children's Center as well as developments in the public and private sectors, there are experiences that might help guide your program in the future. We propose the following recommendations:

- 1. Establish a National Coordinating Center for Youth Farm Safety Education.**
 - a. The Center should be modeled similar to the NIOSH-funded National Children's Center and the USDA's National AgrAbility Project, providing a national infrastructure base with connections across the U.S.
 - b. The spectrum of responsibilities for the Center would likely be modified over time depending on multiple factors.
- 2. Require the newly-established Center to have a multidisciplinary Advisory Committee as well as several Functional Partnerships.**
 - a. Advisors should represent major stakeholder groups in the private and public sector and representatives from behavioral science, health communication and social media disciplines.
 - b. Functional partner organizations would include: a) the NIOSH-funded Children's Center to provide guidance on evidence-based curricula and program evaluation as well as links to the regional NIOSH Agricultural Research Centers; b) the Agricultural Safety and Health Council of America (ASHCA) to provide industry input into program adoption and funding for program implementation; c) the National Association of Agriculture Educators and/or National Council for Ag Education to guide and endorse curricula; d) the National FFA to facilitate program adoption; and e) Department of Labor to inform the program regarding federal labor regulations and exemptions.
- 3. Broaden the focus of program content and expand the training to include parents/adults and employers.** Specifically, we suggest:
 - a. The focus of program content should be based upon disease/injury data, ensuring it addresses the most compelling work exposures and injury risks.
 - b. Messaging and education must have theoretical underpinnings in the behavioral sciences and health communication arenas.
 - c. Curricula must have suitable messages and delivery options for underserved (e.g. low literacy) youth workers and their parents.
 - d. Because mechanisms for reaching youth and adults have changed dramatically in recent years (e.g. social media and other technologies), the curriculum should contain blended and active learning methods that influence work behaviors.
 - e. National Advisors should develop position statements regarding those jobs that should not be endorsed for young workers, e.g. working in grain handling facilities.
 - f. Parents/adults and employers should be involved in certain training activities to emphasize the accountability of adults for eliminating hazardous activities and exposures for youth working in agriculture.

Thank you for this opportunity. We sincerely support your efforts to safeguard young agricultural workers and we offer our assistance in any way moving forward.

Sincerely,



Barbara Lee, RN, PhD

Sincerely,



Barbara Marlena, PhD

Jack Staats, Oklahoma State Supervisor of Agricultural Education

jstaa@okcareertech.org

- What are the current educational gaps in agricultural safety and health education that could be addressed through this program?
In Oklahoma our belief is there has not been an emphasis statewide or nationally to teach and implement an agricultural based safety curriculum. We are reemphasizing this curriculum in our state.
- What are the critical components of a coordinated approach to Agricultural Safety and Health Education?
In our state we have developed a curriculum and we are encouraging our teachers to implement the curriculum as part of their curriculum base. We are also in the process of having our curriculum endorsed by state industry and partnering with state industry to exemplify the need to use the curriculum. This curriculum will also have knowledge and skill outcomes and have certification.
- Is there a need for a one-stop-shop for education and program materials in agricultural safety and health?
A curriculum source or an internet source that has viable and rigorous material and has the type of material that young people relate to and with could be a huge positive for all states.
- What educational standards should be considered in development of the curriculum?
Agricultural Education already has national standards that have been addressed and implemented by Agricultural Education classrooms for years. However, the collaboration between industry and the classroom could and should be revisited. Because agricultural education enrollment is approaching a million students, the agricultural education classroom is still the major vehicle for delivery.
- What can be done to improve educational outreach to vulnerable populations, such as non-English speaking and immigrant youth, in agricultural jobs?
The curriculum and competencies that have been developed should be afforded to young people in other languages. We want people to use English, but most non-English speaking young people still continue to fully understand their language at a higher level.
- What partners would be beneficial to engage in developing a more comprehensive and effective agricultural health and safety curriculum for youth?

Any organization that deals with Agriculture should be a partner. We have left our industry partners out of the conversation and training forever. For example, the curriculum in our state already exists, we are simply reaching out to all levels of agriculture to endorse and publicize the curriculum and that they reinforce the idea that the curriculum is taught in agricultural education classrooms.

- What educational approaches, such as use of social media, could be used to get the message out, both more effectively and to a larger number of young workers?
Possibly, convert educational material in the form of an App that can be downloaded and referenced. Also, develop social media sites so as to continue to advertise our curriculum and our training and know that this training is open to all people, and that it is available in agricultural education classrooms.

Chaliff, Matt - Office of Career and Technical Education
matt.chaliff@education.ky.gov

To Whom It May Concern:

I am writing in regard to the Youth Farm Safety Education and Certification Competitive Grants Program” (YSEC). For Kentucky Agricultural Education the safety of our students involved in Supervised Agricultural Experience (SAE) programs is a top priority. We believe strongly in the educational value and benefits to students of these projects while recognizing that there are inherent dangers in many agriculture related experiences. We are committed to educating our students on agriculture safety so that they can work safely throughout their careers.

Currently, safety is integrated into a number of courses and educational experiences in Kentucky Agricultural Education. Safety receives more emphasis in some schools than others and is not a strong enough component of materials related to SAE programs. While teachers discuss safety with students our teachers are not adequately trained to assess safety risks involved with SAE programs. Further training and resources are definitely needed in this area.

We believe that a coordinated approach to Agricultural Safety and Health is the most effective way to prevent farm related injuries and deaths. Agricultural Education programs can directly teach farm health and safety concepts to students enrolled in Agricultural Education. These students are the future workforce but can also communicate this training to parents, co-workers, and siblings. Agricultural Education can also play a valuable role in disseminating this information through sponsoring safety trainings for younger students and the community. Agricultural Education programs and FFA chapters across the state are currently engaged in safety partnerships with others in the community and these have proved effective in reducing injuries and deaths in years past.

While there are currently some good resources available related to Agriculture Health and Safety these resources are not in a central location. A teacher preparing lessons on safety or preparing for a safety field day is faced with the task of searching several places to find good resources. The resources available vary in quality and functionality in relation to students. A central source for safety resources

for educators would make teaching these concepts easier for teachers and insure more uniformity in this instruction across the nation.

Educational materials that are developed should align as much as possible with the Agriculture Food and Natural Resources (AFNR) standards that were developed by the Council for Agricultural Education. As appropriate, the standards should also align with the Common Core Career and Technical Education standards. This will make it easier for teachers to integrate these concepts in their courses and will insure that the curriculum aligns with existing standards and exams.

In Kentucky, Agricultural Education struggles to meet the needs of immigrant and non-English speaking youth. The language barrier is a tremendous obstacle and unfortunately, most materials our teachers are using are not available in Spanish. We face the additional struggle of reaching these students because many are not enrolled in high schools and if they are they are not taking Agricultural Education courses. Reaching these students earlier in their lives is important for their safety but it is nearly impossible to do without resources in their language.

We believe that Teachers of Agriculture would be one of the most vital partners in developing a more comprehensive and effective curriculum related to agriculture health and safety. These men and women know what students need currently but also understand the types of materials that work effectively with students. The quality and usefulness of materials should be much higher if current middle and high school teachers are engaged in their development.

In Agricultural Education, we have a strong connection with our students. We have access to students through our Teachers of Agriculture and major events such as the State FFA Convention and the Kentucky FFA Leadership Training Center. We also have direct access to students through Facebook and Twitter (over 4000 followers currently). Both of these outlets give us the unique opportunity to connect with students on important topics such as agriculture safety and health.

Agriculture health and safety is a major concern for Agricultural Education in Kentucky. Through the efforts of numerous individuals and groups, the number of accidents and deaths among young farm workers has declined over the last several years. We realize that one injury is too many and that one death is unacceptable. Through a stronger partnership with the National Institute of Food and Agriculture and the Youth Farm Safety Education and Certification Competitive Grants Program, we believe we can achieve the goal of every student working safely every day.

Sincerely,

Matt Chaliff, Executive Secretary
Kentucky Association FFA

Matt Chaliff
Agricultural Education Consultant/ FFA Executive Secretary
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Frankfort, Kentucky 40601
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matt.chaliff@education.ky.gov

My name is Andy Getz and I'm a Career and Technical Education (CTE) Coordinator for Fort Bend ISD. For the past 11 years that I'm aware, we have been certifying our CTE students in both the general 10 hour and construction 10 hour programs. We have found over the years that it supports in the foundation of our safety program and has shown to be at times an integral factor as to the employability for several of our students. These two programs are nationally recognized and provide our students a sense of achievement and pride when they are handed their OSHA card. If I can be of further service, please contact me at andy.getz@fortbend.k12.tx.us

Thank you,

Andy Getz
Coordinator, Career & Technical Education
Fort Bend Independent School District
(281) 634-1245

Good afternoon. I am Agriscience Instructor and Career and Technology Coordinator at Lampasas ISD- Lampasas, Texas. I have used CareerSafe-an OSHA -based 10 general Safety certification program for my agriscience students- for 10 years. I wanted to ask you to please consider implementing a program related to CareerSafe for agricultural applications. Any industry certifications and experiences that can provide today's students with career training and , equip them to be safe, is a great service to our young people.

I would be happy to answer any questions you might have.

Sincerely,
Steve Forsythe, Ed.D.
- *AgriScience Instructor / FFA Advisor* -
- *C.T.E Coordinator* -

jean public
jeanpublic1@gmail.com

the stakeholder for this program are every taxpayer in this country who are being gouged by the usda for 1914 programs in 2012. usda never gives up and wants to keep going with obsolete, wasteful, antique programs into eternity just for the power they get from it. this industry is in fact a wealthy industry and should be able to give these lessons on safety entirely in house. i also note that the us dept of labor and osha work on these issues, so this is entirely a duplicate, wasteful program. thsi program appears to be a patronage pit that is not needed in this world. i ask for an investigation of the monies spent to date in this program which certainly have been wasted big time and may be spent in a corrupt manner.

THIS IS A 1914 PROGRAM THAT USDA WANTS TO GO ON INTO ETERNITY. THEIR KIDS DONT EVEN WORK ON THE FARMS ANYMORE. THESE AG PROFITEERS HIRE ILLEGAL IMMIGRANTS FROM MEXICO AND

CENTRAL AMERICA TO WORK ON THE FARMS, FULL GROWN MEN, NOT KIDS SO THIS PROGRAM IS STUPID SPENDING FOR THAT REASON AS WELL. THIS PROGRAM NEEDS TO BE SHUT DOWN AND DEFUNDED TO A ZERO BUDGET. IT IS NOT NECESSARY. THE NUMBER OF FARMS IN THE USA HAS DIMINISHED A GREAT DEAL SINCE 1914 AND WE IMPORT A LOT OF OUR FARM PRODUCTS THESE DAYS. THIS IS ANOTHER EXAMPLE OF FAT CAT BUREAUCRACY IN WASHINGTON DC THAT NEVER DIES OR GOES AWAY, IT JUST KEEPS ON TICKING INTO ETERNITY WHETHER NEEDED OR NOT. THIS IS NOT 1914. THIS IS 2012. THERE IS NO NEED FOR A ONE STOP SHOP. THIS IS AN OBSOLETE, WASTEFUL UNNECESSARY PROGRAM. SHUT IT DOWN. THIS COMMENT IS FOR THE PUBLIC RECORD. JEAN PUBLIC

Sirs,

At the present time, insufficient attention appears to be given to ergonomics hazards in agricultural work. Work-related musculoskeletal disorders, including arthritic changes in the lower extremities and spine, occur prematurely in the agricultural community and result in progressively disabling conditions for a large percentage of farmers and ranchers.

Effective ergonomics awareness training should include (as a minimum):

- manual handling risk reduction,
- postural risk reduction,
- vibration and noise risk reduction,
- behavioral risk reduction,

By understanding the mechanisms and consequences of injury, and by applying ergonomics best practice to task design, it should be possible to reduce both the incidence and prevalence of musculoskeletal disorders in the agricultural workforce.

Sincerely,

Robert W. Stuthridge Ph.D.

Ergonomist

National AgrAbility Project

Department of Agricultural and Biological Engineering

Purdue University

West Lafayette, IN 47907

END of WRITTEN COMMENTS.