



STATE OF WASHINGTON
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Michael Freedhoff, Ph.D.
Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Ariel Rios East Building
1201 Constitution Avenue, NW
Washington, DC 20460

Re: Request for Stakeholder Input on the Proposed Design of Assistance Agreements for a National Farmworker Training and Education Program (Docket EPA-HQ-OPP-2023-0643)

Dear Dr. Freedhoff,

The Washington State Department of Health (DOH) values the chance to contribute to the discussion on the National Farmworker Training and Education Program (NFTEP). As stewards of the state's Sentinel Event Notification System for Occupational Risk program and contributors to Washington State's Pesticide Application Safety Committee, DOH is committed to ensuring the well-being of agricultural workers. In partnership with Washington State Department of Labor and Industries (LNI) and Washington State Department of Agriculture (WSDA), DOH strives for a holistic approach to pesticide safety, emphasizing both education and regulation.

DOH proposes that the NFTEP focus on localized training, customized for the specific needs of different crops and regions, leveraging extensive knowledge of Washington's agricultural landscape. This approach promises to significantly improve the efficacy of safety programs and safeguard the health of farmworkers. Additional responses to the questions in the RFI are outlined below.

- 1. How can EPA support meaningful, consistent involvement of farmworker communities in the design and implementation of these programs, understanding that they face many barriers to involvement?**

DOH recommends EPA facilitate direct engagement with farmworker communities through partnerships with local organizations and advocacy groups that already have trust and communication channels established within these communities. Providing accessible, multilingual information and feedback channels, and offering flexible engagement opportunities that accommodate the unique schedules and challenges faced by farmworkers are also essential. Additionally, the EPA could implement targeted outreach programs that focus on education and awareness to reduce barriers to involvement, ensuring that farmworker voices are heard and considered in program development and implementation. These efforts should prioritize inclusivity, accessibility, and responsiveness to the needs and concerns of farmworker communities.

It's crucial to not only facilitate engagement through partnerships with local organizations and provide multilingual information but also to ensure that community members are compensated for their contributions. Recognizing the value of their input by offering compensation can further reduce barriers to involvement and foster a more equitable and respectful exchange. This approach underlines the importance of their participation and acknowledges the unique insights and experiences they bring to the table.

2. Are there others who could be considered part of farmworker communities who are not captured in the “Definitions” section of the RFI?

Farmworkers who may not be captured in the existing definitions are those serving as Promotoras de Salud (Community Health Workers) and those involved in care work (childcare, elderly care, housework) in addition to occasional farm labor. We suggest broadening the definitions to include all those affected by pesticide use, not only those directly involved in farmwork. This should encompass local healthcare providers, educators, environmental and public health advocates, and residents near agricultural sites. Expanding these definitions will allow the National Farmworker Training and Education Program (NFTEP) to address the wider implications of pesticide exposure and ensure comprehensive training materials that cater to the entire community's needs, ultimately fostering a safer environment for all.

3. What are the barriers to applying for and successfully managing these agreements, for the organizations described in the “Eligibility” section of the RFI?

One of the barriers we have experienced at DOH in contracting with community-based organizations is the need for a fiscal sponsor or 501.c.3 status, many community-based organizations struggle in this area and must learn how to incorporate or seek a fiscal sponsor who may charge an overhead fee apart from engaging in the work outlined by the grant. Having technical assistance for small community-based organizations on these matters has helped DOH expand its reach into vulnerable populations. Another obstacle that DOH experienced was the delay in payment or requiring the community-based organization to front the work before billing, many small community-based organizations are able to complete the work easier if they receive funding upfront.

Simplifying application processes and offering clear guidance can lower barriers for organizations. Additionally, increasing awareness about the availability of grants through targeted outreach and offering workshops or webinars on application preparation could encourage broader participation. To address concerns of high competition, the EPA might consider allocating funds based on geographic and crop-specific needs, ensuring a diverse range of organizations can benefit. Partnering with established local and state agencies could also streamline efforts and leverage existing networks for broader impact. Opening the eligibility to farmworker serving community health centers and local health jurisdictions who have Promotoras de Salud (community health workers) on staff will likely increase the EPA's ability to complete trainings within the existing limitations. DOH recommends working with associations such as the North West Regional Practitioners and Clinicians Association and others across the United States that are affiliated with the National Farmworker Health Center to make sure that their members will apply to the EPA program.

4. What specific Languages (besides Spanish) should these agreements prioritize for training, materials development, and translations?

To enhance the effectiveness of training, materials development, and translations for the NFTEP, it is crucial to prioritize a diverse range of languages beyond Spanish. Special attention should be taken with common Meso-American Indigenous languages such as Mixteco, Zapoteco, Triqui, and Mam. The COVID-19 Farmworker Study that DOH coordinated in 2020 specifically identified mono-lingual speakers of Mam as a growing community in Washington State. Community engagement efforts with these populations found that it was important to have videos and audio in language, as opposed to paper translation, and that having visual aids was crucial in fostering understanding. Washington State is also host to many refugee and immigrant communities that often find themselves doing agricultural labor, specifically those who speak Haitian Creole, Hmong, and Burmese. Including these languages will help reflect the linguistic diversity within the United States' farmworker populations. DOH has utilized data from the Sentinel Event Notification System for Occupational Risk Washington's Office of the Superintendent of Public Instruction, Behavioral Risk Factor Surveillance System, Comprehensive Hospital Abstract Reporting System, the Washington Disease Reporting System through the Washington Tracking Network to identify and prioritize the needs of vulnerable populations in Washington State. Similarly, the EPA has the opportunity to tailor NFTEP efforts to the language needs in specific regions to ensure that pesticide safety information is accessible and effectively communicated to all farmworkers.

5. How can EPA support translations that are both technically accurate and appropriate to farmworker communities' literacy levels and cultural context?

Collaborating with community organizations and language experts can enhance the cultural and linguistic appropriateness of translations. This approach involves creating materials that are straightforward, integrating visual aids, and ensuring translations are culturally and linguistically appropriate. Including farmworkers in the translation process for accuracy checks and leveraging visuals like illustrations and infographics can significantly improve comprehension

and ensure the materials are both accessible and engaging, thereby meeting the diverse needs of farmworker communities effectively.

6. What training is needed to reinforce and supplement the required annual WPS pesticide safety training for workers and handlers?

In addition to the essential annual WPS pesticide safety training, the integration of Integrated Pest Management training is crucial. This approach educates workers and handlers on safer, alternative pest control methods. Moreover, enhancing this foundation with specific training for supervisors and team leads is vital, leveraging models like Washington State's Agricultural Leadership Program. This comprehensive program equips leaders with crucial skills in emotional intelligence, communication, and conflict resolution, contributing significantly to a safer and more effectively managed work environment. This multifaceted approach to training ensures comprehensive safety education, from ground-level handlers to leadership, fostering a culture of safety and sustainability across all levels of farm operations.

7. What educational gaps exist for pesticide handlers (see the “Definitions” section), specifically, who may be considered part of farmworker communities but have additional responsibilities under the WPS?

To address the educational gaps for pesticide handlers under the WPS, it's essential to enhance training in several key areas. These include emphasizing the importance of reporting illnesses with assurances of anonymity and protection from retaliation, understanding the roles of various regulatory agencies, and proper use of pesticide labels and Safety Data Sheets. Training should also cover the correct procedures for donning and doffing PPE, recognizing symptoms of acute pesticide illness, understanding healthcare rights, application techniques to minimize exposure, awareness of heat-related illnesses, the WPS non-retaliation clause, the benefits of on-farm training over classroom instruction, and effective management of pesticide spills. Incorporating these focus areas into training programs ensures comprehensive safety education for those with additional responsibilities under the WPS, enhancing overall workplace safety for farmworkers.

Incorporating elements from the Washington State Agricultural Leadership Program can significantly address the educational gaps identified for pesticide handlers under the WPS. By integrating leadership training designed for farm supervisors and managers, such as that offered by the Agricultural Leadership Program, pesticide handlers can acquire essential skills in emotional intelligence, communication, delegation, conflict resolution, and more. This approach not only addresses technical and safety aspects of pesticide handling but also fosters a holistic understanding of workplace dynamics, leadership, and the importance of effective management practices in promoting safety and reducing pesticide exposure risks among farmworker communities. This comprehensive training model, emphasizing both technical expertise and soft skills, can significantly enhance the overall effectiveness and applicability of WPS training.

8. What are examples of successful outreach and delivery strategies to ensure that farm worker communities receive pesticide safety information and trainings?

To effectively enhance outreach and delivery strategies for farmworker communities regarding pesticide safety information and training, the following strategies are recommended:

1. Offer bilingual training opportunities to overcome language barriers and ensure comprehensibility of safety protocols for all workers.
2. Increase accessibility to training by utilizing various media channels, including radio and television programming, to reach workers in remote locations.
3. Engage trainers who possess both agricultural and safety expertise, enabling them to address complex topics such as proper PPE usage, safety reporting, and respond to trainees' questions effectively.

These strategies are designed to make safety training more accessible, relevant, and practical, meeting the specific challenges faced by farmworker communities.

9. Should awards be selected based on geographic areas and crop use sites?

The selection of awards based on geographic areas and crop use sites is advantageous. It acknowledges the varied methods of pesticide application across different crops and regions, thereby enhancing the relevance and effectiveness of Worker Protection Standard (WPS) training. This approach can lead to more targeted and efficient training programs, better resource allocation, and ultimately, reduced pesticide exposure among farmworker communities. Tailoring safety information to specific agricultural practices ensures that training is directly applicable, increasing its impact on farmworker safety.

Thank you for the opportunity to contribute to this request for information. If you have any questions, please contact DOH's Federal and Regulatory Affairs Director, Michael Ellsworth at Michael.Ellsworth@doh.wa.gov or the Director of Governor Inslee's, Washington D.C. office, Morgan Wilson, Morgan.Wilson@gov.wa.gov.

Sincerely,



Lauren Jenks
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