HOOAs Certification Training Program Assessment Tool (PAT)

What is the Purpose of the Assessment Tool?

The purpose of the Agricultural Hazardous Occupations Order (HOOAs) Training Program Assessment Tool (PAT) is to provide educators and curriculum designers a standardized method of uniformly assessing curriculums or training programs to ensure that they meet the minimum safety and health training requirements prescribed under Subpart E-1 of Part 1500 of Title 29 of the Code of Federal Regulations or better known as the HOOAs. This federal regulation, part of the 1938 Fair Labor Standards Act, was enacted to provide protection to workers, including children and youth, working in agricultural production. The Fair Labor Standards Act is enforced in all states and identifies certain tasks in agricultural workplaces considered to be particularly hazardous and disallowed for youth and children under the age of 16. The Act contains provisions that allow certain 14 and 15 year olds to perform very specific tasks for hire if certain training requirements are met. Many states have established training programs in order to allow qualified youth to meet the HOOAs training requirements. The PAT is intended to enhance the quality and consistency of instruction being provided nationwide by these local or statewide programs, which will potentially lead to a reduction in the frequency and severity of injuries to youth working in agricultural production.

Why is a Standard Assessment Tool Needed?

Since its adoption in 1963, the HOOAs training requirements have provided the impetus for providing safety training for tens of thousands of youth seeking employment in agricultural production. In addition, an even greater number of youth have also received valuable safety training who were exempt from the HOOAs requirements due to their being part of a farm1 family and limiting their work to their family farm, but who completed the HOOAs training anyway. Over time a wide variety of programs and curricula have been developed across the U.S. to meet the prescribed HOOAs training requirements resulting in programs with different content, format, duration, and outcome expectations. Research has found that current training programs have evolved into diverse instructional activities that generally have good content, but in some cases, no longer meet the minimum requirements of the HOOAs or do not have clearly defined or measurable outcomes. To address this issue a project was undertaken by Purdue University with support from the United States Department of Agriculture, to identify the minimum instructional components and the minimum core content that should be included in all training programs intending to meet the HOOAs training requirements. These minimum standards were utilized to develop criteria that could be incorporated into an easy to use on-line or print format assessment tool that can be applied to any current training program to ensure compliance with the fundamental intentions of the HOOAs.

How Was the Assessment Tool Developed?

The minimum standards, or expectations, addressed by the PAT reflect the input of a team of curriculum specialists, safety professionals, and, current and past HOOAs training program instructors who worked together to interpret and clarify the published HOOAs training requirements and supporting documentation. This included review of past interpretations provided by the U.S. Department of Labor in response to specific questions related to the HOOAs. The standards developed by the team are not legal opinions, but reflect the best effort to date to identify what the HOOAs require with respect to training and the most appropriate means of meeting the intended expectations of the regulations. In addition, the team recognized that new hazards have developed as the result of changing agricultural practices and the introduc-

¹ A farm is defined here as any place where agricultural production takes place including a farm, ranch, orchard, vineyard, nursery, or tree farm.

farmsafety.org

tion of new technology. Therefore, it was determined that the minimum core content should address the most significant of these new hazards even though they are not specifically addressed by the HOOAs.

The minimum standards identified in the PAT are not intended to prohibit or restrict the addition of any supplemental instructional activities or content intending to address unique cultural, geographical, or agricultural practices that present special risks to youth enrolled in a particular program. The minimum standards address those components that should be identifiable in every program to fully comply with the HOOAs requirements. In some cases, current instructional content will have to be modified to accommodate differences in student work experiences, their background (farm vs. non-farm), and the type of work they will be employed to perform. It may also be influenced by the amount of on-the-job training that potential employers might provide.

All regulations are subject to change. Consequently, the PAT was designed such that it can be readily modified to reflect future changes to the Fair Labor Standards Act and the HOOAs, as well as other applicable federal regulations.

How is the Assessment Tool Designed?

The PAT is organized into ten primary components; each addressing specific requirements identified within the HOOAs or believed by the design team to be implied by the regulations or reflected by current practice. These components are:

- 1. Program Outcomes
- 2. Program Oversight
- 3. Instructor Qualifications
- 4. Student Prerequisites
- 5. Duration of Instruction
- 6. Minimum Content Areas
- 7. Testing Requirements
- 8. Remedial Testing Opportunities
- 9. Documentation of Meeting Certification Requirements
- 10. Record Keeping Requirements

The PAT is designed as a series of "Yes" or "No" questions that can be used to review existing training programs and document whether or not the various components of a specific program meet the current HOOAs requirements. A comment section is provided to identify specific areas that need further attention with recommendations for how the needs or weaknesses should be addressed. The PAT does not require that the user or assessment team estimate how well the program meets HOOAs requirements; just whether it does or not.

The findings from using the PAT are not legal conclusions nor are program facilitators required by any current state or federal law to use the PAT or report its findings. Facilitators are encouraged, however, to use the PAT to identify areas that may need enhancement or corrections. The PAT is intended for program improvement and to help program leaders and facilitators to ensure that the training they are offering to youth meets the minimum requirements of the HOOAs.

Some of the language used in the PAT is based upon the original language of the HOOAs drafted in the 1960s. To clarify terms no longer widely used, more current or widely used forms of the original terminology are used in the text with

farmsafety.org

the original term included in brackets. For example, "vocational agriculture" has been replaced with the more currently acceptable term "agricultural science and business."

Another potential use of the PAT is to provide a guide in the design and implementation of new training programs intending to meet the HOOAs training requirements.

How is the Assessment Tool Administered?

The following steps provide a recommended strategy for utilizing the PAT with a currently used training program. (The PAT can be completed either in its online format or it can be printed off and used in printed form.)

- 1. Set a time and place for all individuals involved in planning and conducting the training program to meet and work through the PAT as a group. If you are the only person involved with the program, this process might provide a good opportunity to organize a small advisory committee to assist with the assessment and, hopefully, become more involved with the program. The group might involve Extension educators, parents of participants, agricultural employers, local implement dealers, law enforcement, and agricultural educators. The group should be small enough to allow input from everyone. A good size group includes 5 to 8 people.
- 2. Assemble all of the curriculum resources currently being used to provide the HOOA training. This would include printed and audio visual material, course outlines, and lesson plans. If you are using the GEARNG UP FOR SAFETY curriculum, it has been designed to meet, and in most cases exceed, the curriculum requirements. Avoid assessing components of the program that are informally done or cannot be documented. Focus on what is a regular part of the program.
- 3. Using the PAT as a guide, have each member of the assessment team independently respond to each of the questions. Then go over the responses as a group looking for areas of consensus with respect to both strengths and weaknesses. Do not be surprised that areas will be identified that will need attention to meet the minimum requirements. Many training programs over the years have evolved around specific individuals, curriculum material, and traditions that have allowed certain required components to be dropped or de-emphasized.
 - Have the team members then collectively answer each question "Yes" or "No". If there is consensus and the question can be confidently answered "Yes", move on. If the answer is "No", briefly describe what needs attention. For example, if the current training program no longer receives direct oversight by an Extension educator/agent or agricultural science and business educator, this is a need that should be addressed. Record the needs in the space provided on the PAT.
- 4. If the assessment process is being conducted as a group, summarize the responses and attempt to come to a consensus on each item. For example, if three members of the team believe the program meets the required hours of instruction and two do not, attempt to resolve the difference. The PAT contains information on specific requirements that should be helpful to clarify and/or resolve some of the issues raised.
- 5. Attempt to prioritize the list of needs or weaknesses identified that should be addressed in order to bring the training program into compliance. The goal here is to attempt to identify shortfalls that need immediate attention since with limited time and resources not everything can typically be corrected at one time.
- 6. For each need or weakness identified, develop a feasible response for addressing the shortfall. For example, if the current program does not meet the minimum required hours of instruction, describe how this requirement might be met. In some cases the correction will require little additional effort. However, if the need is substantial, such as a program that provides only 10 hours of actual instructional time when 24 hours are required, it may necessitate substantial modifications to the program in order to meet the minimum standards.

farmsafety.org

7. Using the PAT as a baseline, conduct regular, or at least annual, follow-up assessments to determine whether or not needs are being addressed. Document steps toward meeting the minimum requirements.

If all the training material is readily available, it should not take longer than two hours to complete the PAT and much less if all the instructors and coordinators are present.

Remember, completing the PAT is not required by any local, state, or federal agency. There are no penalties for identifying areas that need attention. Completed PATs are for program improvement purposes and are not required to be submitted to anyone. Completion of an assessment is encouraged as a process to assist local program leaders in enhancing the HOOAs required training and ensuring that the training meets all of its minimum requirements. It is, however, important to point out to youth participating in the program and their parents, as well as potential employers, whether or not the training being provided meets the HOOAs requirements.

Need Help?

With support from USDA, the GEARING UP FOR SAFETY Steering Committee has agreed to provide technical support to anyone needing assistance to enhance their HOOAs training program or ensure that their training meets the current training requirements. If you need such assistance please make contact via the Web at www.agsafety4youth.info.

The National Project staff are open to any suggestions that would help make the PAT more effective or user friendly.

Your comments and suggestions are welcome.

Hazardous Occupations Order for Agriculture Certification Training Program Assessment Tool (PAT)

	Yes	No	Areas Needing Attention	How Needs Will Be Met
1. Program Outcomes Does the program have clearly defined outcomes that are understood by everyone involved (parents, youth, instructors, leaders)? ¹	O Yes	O No		
2. Program Oversight Is the program under the direct supervision of one or both of the following:				
2.1 Extension Educator/Agent of the CooperativeExtension Service?	O Yes	O No		
2.2 Agricultural Science and Business Teacher (Agricultural Educator or Vo-Ag Instructor)	O Yes	O No		
3. Instructor Qualifications ²				
3.1 Do all instructors meet current organizational requirements for participating as a youth volunteer or worker including established code of conduct and completion of criminal background checks if required?	O Yes	O No		
3.2 Are all instructors involved with the training familiar with basic agricultural workplace hazards (i.e. growing up on a farm, working on a farm, employed in a farm-related occupation)?	O Yes	O No		

¹A suggested statement of desired student outcomes might be as follows:

The primary outcome of the HOOAs training program will be youth who are 14 and 15 years of age who have objectively demonstrated the appropriate physical, emotional, and cognitive characteristics and competencies recognized as essential prerequisites for employment to safely operate agricultural tractors and machinery as well as perform other allowable general farm and ranch tasks considered especially hazardous for youth by current federal regulations. Regardless of the precise language, your program should have a mission statement or goal that describes desired outcomes.

²Current HOOAs regulations provide no specific guidance concerning the selection or qualifications of instructors other than that the training has to be under the supervision of either a Cooperative Extension educator/agent or an agriculture science and business teacher. In some cases there may be more qualified and/or experienced individuals available to provide instruction other than the two designated professionals, however, they still must be under the guidance of at least one of the two designated professionals.

	Yes	No	Areas Needing Attention	How Needs Will Be Met
3.3 Have all instructors been provided with information on the HOOAs and are they knowledgeable of the specific training requirements contained in the regulations?	O Yes	O No		
3.4 Are all instructors familiar with the educational resources available to provide instruction that meets HOOAs certification requirements?	O Yes	O No		
4. Student Prerequisites ³				
4.1 Student Learners classification – Are youth participating under a Student Learners or Supervised Agricultural Experience (SAE) Program exemption. They must:				
4.1.1 be enrolled in a secondary agricultural science and business education (vocational education) training program?	O Yes	O No		
4.1.2 have a written agreement in place that specifies the following conditions?	O Yes	O No		
• the work of the student-learner is incidental to his/her training;				
• work shall be intermittent, for short periods;				
 safety instruction shall be given by the school and complimented by the employee with on the job training; 				
 a schedule of organized and progressive work procedures to be performed on this job has been prepared (specific tasks to be performed are identified) 				
4.2 Cooperative Extension Service classificationAre youth participating under the 4-H program exemption. They should be:				
4.2.1 officially enrolled as a 4-H member?	O Yes	O No		

³ There are three categories of students/youth who are eligible to participate in certification under the provisions of the HOOAs. Any student/youth, however, can participate in the training.

		Yes	No	Areas Needing Attention	How Needs Will Be Met
4.2.2	at least 14 years of age, or older? 4	O Yes	O No		
4.2.3	familiar with the normal working hazards in agriculture?	O Yes	O No		
4.3	Agricultural science and business (vocational agriculture) training classification – Are youth participating under the agricultural science and business (vocational agriculture) education exemption. They must be:				
4.3.1	enrolled in a secondary agricultural science and business (vocational agriculture) class? (This is assumed under HOOA.)	O Yes	O No		
4.3.2	at least 14 years of age, or older?	O Yes	O No		
4.3.3	familiar with normal working hazards in agriculture?	O Yes	O No		
5.	Duration of Instruction Does the program or curriculum meet the following minimum instructional contact time requirements of the HOOAs based upon program host? (Based upon who is supervising the training.)				
5.1	Cooperation Extension Service Training Program Option:				
5.1.1	for just tractor operation training program, are 10 hours of training provided?	O Yes	O No		

⁴ Youth younger than 14 have traditionally been allowed to enroll and participate in the HOOAs certification training program. However, they must be at least 14 years of age before receiving their certification and be eligible for employment. Enrollment may depend on when the course is ofered and when the youth turns 14. There is good justification to enroll the youth early if they become of age shortly after the training.

		Yes	No	Areas Needing Attention	How Needs Will Be Met
5.1.2	for combined tractor and machinery operation training program are 20 hours of training provided?	O Yes	O No		
5.1.3	for tractor and machinery operation program for non-4-H members are 24 hours including a 4-hour orientation emphasizing the normal working hazards of agriculture provided?	O Yes	O No		
5.2	Agricultural Science and Business Program (vocational agriculture) Option:	O Yes	O No		
5.2.1	for just tractor operation training program are 15 hours of training provided?	O Yes	O No		
5.2.2	for machinery operation training program are 10 hours of training provided?	O Yes	O No		
5.2.3	for combined tractor and machinery operation training program are 25 hours of training provided?	O Yes	O No		
6.	Minimum Content Areas ⁵ Does the program or curriculum include coverage of the following minimum core content areas? (The total number of contact hours does not allow comprehensive coverage of any specific topic, however, the topics listed should be included in the curriculum outline and addressed, if even briefly.)				
6.1	General Agricultural Workplace Safety				
6.1.1	Applicable state and federal regulations (OSHA, USDOL, WPS, FLSA, EPA, DOT)	O Yes	O No		

⁵ The current HOOAs regulations do not clearly identify all potential hazards that youth may encounter while engaged in farm-related work. The list of minimum core content areas covers those topics specifically mentioned in the regulations and several that reflect current agricultural-related youth injury data and agricultural work practices.

	Yes	No	Areas Needing Attention	How Needs Will Be Met
6.1.2 Characteristics of safe farm and ranch workers (dress, behavior, health, attitudes, developmentally/physically appropriate)	O Yes	O No		
6.1.3 Mechanical hazards (pull-in, pinch, wrap, crush, flying objects, cut and shear points)	O Yes	O No		
6.1.4 Personal protective equipment (eye, hand, hearing, respiratory, skin)	O Yes	O No		
6.1.5 Operator manuals/instructions (warnings, universal symbols, specifications)	O Yes	O No		
6.1.6 Chemical hazards (certification requirements, Material Safety Data Sheets (MSDS), pesticide restrictions, field reentry times, fertilizers, cleaners, solvents, pharmaceuticals, sanitizers, symptoms of pesticide poisoning)	O Yes	O No		
6.1.7 Electrical hazards (Ground Fault Current Interrupter (GFCI), overhead powerlines, proper grounding, underground power lines, double insulated tools, location of power disconnects)	O Yes	O No		
6.1.8 Livestock hazards (working prohibitions, zoonotic diseases, animal behavior, breeding livestock)	O Yes	O No		
6.1.9 Structural hazards (working prohibitions, height limitations, falls, confined spaces, silos, bins, manure pits, chemical storage)	O Yes	O No		
6.1.10 Demonstrate and interpret frequently used universal hand signals (stop engine, come here, raise, lower)	O Yes	O No		

		Yes	No	Areas Needing Attention	How Needs Will Be Met
6.1.11	Environmental hazards (sun, noise, darkness, heat, cold, dust/fumes, mold, insects, snakes, tetanus)	O Yes	O No		
6.1.12	ATVs and utility vehicles ⁶	O Yes	O No		
6.1.13 7	Emergency response (what constitutes an emergency, treatment of minor injuries, utilizing 911, fires, blood loss, entrapment, unconsciousness)	O Yes	O No		
6.2	Agricultural Tractors and Self Propelled Equipment	O Yes	O No		
6.2.1	Controls, instruments and gauges (color coding, standardization of movement)	O Yes	O No		
6.2.2	Operational systems (fuel, electrical, engine, cooling transmission, hitching, traction, hydraulic)	O Yes	O No		
6.2.3	Safety systems/components (seat belts, ROPS, shielding, safety systems including interlocks, enclosed cabs, steps and hand holds, marking and lighting)	O Yes	O No		
6.2.4 O	perating procedures (starting, stopping, moving, mounting, dismounting)	O Yes	O No		

⁶ Even though ATVs are not specifically mentioned by the HOOAs regulations, they are, however, a cause of injuries for youth engaged in agricultural work or while participating in recreational activities on farms and ranches. Instructors are encouraged to cover the basic hazards of operating ATVs and/or encourage participants to complete an ATV safety training class, if available.

⁷The HOOA certification training requirements do not include basic first aid or CPR training. The intent here is not to suggest that participants become certified in any area of first aid, but rather ensure that they are provided basic instructions on how to recognize an emergency and how to appropriately respond.

	Yes	No	Areas Needing Attention	How Needs Will Be Met
6.2.5 Operational hazards (stability, rollovers, runovers, slips and falls, extra riders, proper use of instructional seats, obstacles,	O Yes	O No		
PTO, fires) 6.2.6 Public road use (operator age requirements, lighting and marking requirements, weight, width and length restrictions, transport position, hitch pins, safety chains)	O Yes	O No		
 6.3 Agricultural Implements and Equipment 6.3.1 Identification of specific types of agricultural equipment and implements that cannot be operated under the provisions of the HOOAs. (trencher, earth moving equipment, forklift, potato combine, power driven circular, band or chainsaw) 	O Yes	O No		
6.3.2 Specialized instructions (operator safety signs and safety messages)	O Yes	O No		
6.3.3 Power transfer (PTO drivelines, hydraulics, electrical, belts and chains, gears and shafts, and stored energy)	O Yes	O No		
6.3.4 Implement hitching (3-point, front mounted, mid- and rear-mounted PTO, hydraulics, drawbar, frame mounted, header attachments)	O Yes	O No		
6.3.5 Pre-inspection of implements (leaks, tires, lighting, SMV emblems, hydraulics, shielding, damaged or missing components)	O Yes	O No		
6.3.6 Allowable agricultural implement and equipment operating hazards (corn pickers, cotton pickers, grain combines, mowers, forage harvesters, windrowers, hay balers, potato diggers, mobile pea viners, feed grinders, crop dryers, forage blowers, self-unloading wagons, post hole diggers, post drivers, and non-walking rotary tillers)	O Yes	O No		

		Yes	No	Areas Needing Attention	How Needs Will Be Met
6.3.7	Material handling equipment (portable auger, conveyors, front-end loaders, hay elevators, handling large round and square bales, flowing grain hazards, safe lifting)	O Yes	O No		
6.3.8	Farmstead/ranch maintenance equipment (hand tools, power tools, lifting equipment, compressed air, welding/cutting equipment)	O Yes	O No		
7.	Testing Requirements ⁸ Does the program or curriculum require objective student testing that utilizes each of the three following evaluation methods administered in the order presented:				
7.1	A minimum passing score of 70 on a comprehensive written exam over general knowledge relevant to the safe operation of agricultural tractors and machinery, and general safe work practices in agricultural production?	O Yes	O No		
7.2	Demonstration of pre-operation-inspection skills required to safely operate agricultural tractors and machinery? (See Testing Methods and Tools for specific skills to be tested.)	O Yes	O No		
7.3	Demonstration of safe tractor operation skills over a standard driving course? (See Testing Methods and Tools for specific skills to be tested.)	O Yes	O No		
8.	Remedial Testing Opportunities ⁹				
8.1	Is it anticipated that some students/youth participating in the training will be unable to meet the minimum requirements for the safe operation of agricultural tractors and machinery during their initial attempt?	O Yes	O No		

⁸ Under the current HOOAs regulations, the methods used to assess student outcomes are vague and leave considerable room for local and instructor interpretation. Meeting the standards identified under the Testing Methods and Tools section of the LEADER'S GUIDE meet and may exceed the HOOA requirements.

⁹ The purpose of the certification process is to ensure that participants meet a set of minimum standards prior to employment at work considered especially hazardous. If the standards are so low that everyone meets them, the need for a certification process is doubtful. Even though notcurrently required by the HOOAs, providing a remedial or second opportunity for meeting the testing requirements is not specifically prohibited.

		Yes	No	Areas Needing Attention	How Needs Will Be Met
8.2	Does the training program or curriculum provide an avenue for students/youth to receive remedial instruction and reattempt the testing process?	O Yes	O No		
8.3	Are the results of the testing, if a student/ youth is unsuccessful, reviewed with the parent/guardian and remedial steps or other alternatives considered?	O Yes	O No		
9. D	ocumentation of Meeting Certification Requirements				
9.1	Does each student/youth completing the certification process receive printed documentation of completion that provides the following:	O Yes	O No		
	• date of completion,				
	 signature of individual supervising the training, 				
	 description of work that the youth is allowed to and prohibited from performing under the provisions of the HOOAs? 				
9.2	Are the student/youth completing the certification process and the parents or guardians aware that the certificate does not wimply or guarantee safe work performance, but rather participation in and successful completion of a safety training program?	O Yes	O No		
10.	Record Keeping Requirements ¹⁰				
10.1	Is a record or copy of the certificate of training maintained by the individual supervising the training in a secure location?	O Yes	O No		
10.2	Have the student/youth receiving the certificate of training been informed that they need to provide a copy of the certificate to their employer for his/her files?	O Yes	O No		

¹⁰ It is recommended that documentation of completion of the HOOAs training be maintained for three years or until the student/youth reaches the age of 16.