

FARM Workforce Development DRAFT Evaluation – Public Comment

Introduction

Through resources like the HR and Safety Manuals, the FARM Workforce Development (WFD) program area equips dairy owners and managers with tools to enhance their safe and thriving work environments. This new initiative has brought together stakeholders from the entire dairy value chain to create educational materials for U.S. dairy owners and managers. The suite of educational materials will help farmers who want to implement human resources and safety best practices, enabling them to increase employee engagement, reduce employee turnover, and manage liabilities from the safety risks of dairy farming.

FARM WFD is developing an on-farm, 2nd party evaluation tool that cooperatives and processors can choose to implement with their members. The goals of the 2nd party evaluation tool are to help farms:

- learn about HR and safety management best practices
- identify which best practices will be most useful to implement on their farm
- track improvement over time

Additionally, by performing on-farm evaluations, FARM Participants can provide important assurances to supply chain customers: our dairy buyers and retailers.

The 2nd party evaluation tool was developed in consultation with the [FARM WFD Task Force and Working Group](#) members, along with subject matter expert input.

Public Comment Period

FARM is seeking input on the draft 2nd party evaluation tool through this Public Comment period.

The following document contains the draft 2nd party evaluation questions for FARM Workforce Development. It has been condensed for the purpose of Public Comment. **In the full evaluation, additional context and guidance is provided for each question: explaining why the question is important, pointing to resources to help with next steps, and detailed instructions for the evaluator.** This additional context and guidance are not the focus of Public Comment, so they have been removed from this version.

FARM is also directly getting feedback from dairy producers through a pilot program that runs through the end of 2019. Nine cooperatives have volunteered to test the evaluation with a total of 50 to 60 dairy producers, who will fill out a feedback form. Public Comment is intended to complement the pilot.

Instructions

Public Comment will be open for 45 days, from December 6th 2019 through January 20th 2020. All comments will be considered.

Please download the PDF to view the draft evaluation tool. Refer to the PDF as you answer the questions. The HR portion of the evaluation tool is contained on pages 2 to 4. The safety portion of the evaluation tool is contained on pages 5 to 7.

Human Resources

Question	Question Type
<p>1. In reviewing the farm’s state and federal legal fact sheet as well as the HR Manual, to the best of the owner or manager’s knowledge, does the farm comply with the laws and regulations related to:</p> <ul style="list-style-type: none"> • Pay stubs • Wage deductions • Minimum wage • Pay day / wage rate notice • Payment for all hours worked, including for job training • Payroll recordkeeping (as a best practice, maintain records for at least 5 years is recommended) • I-9 Verification and recordkeeping (separate from personnel file) • New hire paperwork (tax withholding forms, etc.) • Rest and meal breaks • Harassment and discrimination • Forced labor (i.e. no retention of employee personal documents, etc.) • Employee housing, if applicable <p><input type="checkbox"/> YES <input type="checkbox"/> NOT SURE</p>	<p><i>Interview</i></p>
<p>2. Does the farm conduct reference checks and/or past employment verification before offering someone a position?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview.</i></p>
<p>3. Does the farm keep employment applications on file and document the selection process?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Document Review.</i></p>
<p>4. Does the farm conduct new employee orientation?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p> <p>4b. If yes, what content is covered during orientation? Check all that apply.</p> <ul style="list-style-type: none"> <input type="checkbox"/> New hire paperwork (I-9 verification; cow care agreements, etc.) <input type="checkbox"/> Policies and procedures which can be found in the Employee Handbook (e.g. break policy, working hours, animal care policy, drug use policy, disciplinary processes, safety procedures, etc.) <input type="checkbox"/> Timesheets and pay schedule <input type="checkbox"/> Benefits and related forms <input type="checkbox"/> Safety training <input type="checkbox"/> Grievance procedure (i.e. how employees can report concerns or complaints) <input type="checkbox"/> Other: _____ <p>4c. If yes, is the orientation process documented? For example, through a checklist for each new employee.</p>	<p><i>Interview; Document Review.</i></p>

<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	
5. Do owners, managers, and/or supervisors follow up with new employees during their first few months to get feedback on their job duties, the organization, training or other job-related topics? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	<i>Interview.</i>
6. If they request it, are employees provided access to copies of their onboarding materials (e.g. new hire paperwork, benefit sign-up forms, written job description, training materials, etc.)? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	<i>Interview.</i>
7. Does the farm hold regular staff meetings? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	<i>Interview.</i>
8. Does the farm have a process for employees to report complaints, concerns, or other issues? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees 8b. Are employees aware of how to report complaints, concerns, or other issues? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNKNOWN; employee not available for interview <input type="checkbox"/> N/A, no hired employees	<i>Interview; Document Review.</i>
9. Are employees trained for their jobs? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees 9b. If yes, is training documented? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees 9c. If yes, what content is covered in training? Check any topic that the farm covers in training, even if it is not offered for every employee. <input type="checkbox"/> Animal handling <input type="checkbox"/> Job-specific / technical skills <input type="checkbox"/> Management / supervisory skills <input type="checkbox"/> Safety <input type="checkbox"/> Other: _____ <input type="checkbox"/> N/A, no hired employees	<i>Interview; Document Review.</i>
10. Does the farm have an accurate, up-to-date Employee Handbook, Code of Conduct, and/or Business Ethics Policy? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	<i>Document Review.</i>
11. Does the farm document all counseling and warnings when handling performance issues, discipline, unacceptable behavior or conflict? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees	<i>Interview; Document Review.</i>

<p>12. Does the farm use a timekeeping method that allows for employees and managers to review and verify the time worked each pay period? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Observation.</i></p>
<p>13. Are work schedules made and communicated to employees in advance? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p> <p>13b. If yes, are employees able to provide input into their preferred work schedule? In other words, are they given some flexibility when possible to adjust their work schedules to meet personal needs when arranged in advance (e.g. switching shifts so they can participate in child’s school activities)? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Document Review.</i></p>
<p>14. Are rest and meal breaks documented, for example, through a break relief schedule or within the farm’s timekeeping system? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Document Review.</i></p>
<p>15. Does the farm have a written anti-harassment policy that covers harassment and discrimination in the workplace, including how to report complaints? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Document Review.</i></p>
<p>16. Does the farm maintain a personnel file for each worker? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Document Review.</i></p>
<p>17. Are payroll records accessible and auditable? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no hired employees</p>	<p><i>Interview; Observation.</i></p>
<p>18. Does the farm conduct routine inspections of farm-provided housing? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no farm-provided housing</p>	<p><i>Document Review; Interview.</i></p>
<p>19. Does the farm use a written housing agreement signed by all occupants that outlines management and worker responsibilities? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no farm-provided housing</p> <p>19a. If yes, has the written housing agreement been reviewed by an attorney? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no farm-provided housing</p>	<p><i>Document Review; Interview.</i></p>

Safety

Question	Evaluator Guidance
<p>1. In reviewing the farm’s state and federal legal fact sheet as well as the Safety Manual, to the best of the owner or manager’s knowledge, does the farm comply with state and federal safety laws and regulations related to:</p> <ul style="list-style-type: none"> • Safety standards that apply to the dairy • Safety reporting (i.e. injury / fatality reporting) • Safety recordkeeping • Worker’s compensation coverage <p><input type="checkbox"/> YES <input type="checkbox"/> NOT SURE</p>	<p><i>Interview.</i></p>
<p>2. Are legally-required safety posters displayed in a conspicuous, easily visible place?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>	<p><i>Observation.</i></p>
<p>3. Does the farm provide the following essential facilities:</p> <ul style="list-style-type: none"> • One or more restroom facilities that include toilets, sinks, and functional locks <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT REVIEWED</p> <ul style="list-style-type: none"> • A clean drinking water supply <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT REVIEWED</p> <ul style="list-style-type: none"> • Suitable, clean areas for rest and meal periods <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT REVIEWED</p>	<p><i>Observation.</i></p>
<p>4. Is a first-aid kit available?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>4a. If yes, is it regularly inspected to ensure it is fully stocked?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no first-aid kit</p>	<p><i>Observation; Interview.</i></p>
<p>5. Does the farm have a written safety plan / program?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>5a. If yes, which of the following topics are covered within the plan / program? Check all that apply.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Statement of owner and manager safety commitment <input type="checkbox"/> Expectation for employee participation in safety <input type="checkbox"/> Approach to ongoing hazard recognition (e.g. walkthroughs) and abatement <input type="checkbox"/> Approach to safety training <input type="checkbox"/> Emergency procedures <input type="checkbox"/> Policies on specific safety topics [note: written policies / procedures are required by OSHA for some of these topics. Refer to the federal and state legal fact sheets]: <ul style="list-style-type: none"> <input type="checkbox"/> worker safety during animal handling 	<p><i>Document Review.</i></p>

<ul style="list-style-type: none"> <input type="checkbox"/> chemical use and hazard communication (e.g. access to Safety Data Sheets) <input type="checkbox"/> preventing slips, trips, and falls <input type="checkbox"/> machinery with moving parts / machine guarding (e.g. guarding of PTOs, guarding of power transmission, safe equipment operation) <input type="checkbox"/> confined spaces (including manure storage) <input type="checkbox"/> silage management <input type="checkbox"/> sources of hazardous energy (e.g. electrical systems, controlling hazardous energy while performing equipment maintenance through Lockout Tagout, etc.) <input type="checkbox"/> noise <input type="checkbox"/> ergonomics / avoiding repetitive stress injuries <input type="checkbox"/> extreme temperatures 	
<p>6. Is there a way for employees to report safety concerns? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A – no hired employees</p> <p>6b. Are employees aware of how they can report safety concerns? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNKNOWN; employee not available for interview <input type="checkbox"/> N/A – no hired employees</p>	<p><i>Document Review; Interview.</i></p>
<p>7. Are safety inspections conducted on a regularly scheduled basis? For example, weekly or monthly walkthroughs. <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>7b. If yes, which of the following topics / areas are covered during regular safety inspections to check for safety concerns? Check all that apply.</p> <ul style="list-style-type: none"> <input type="checkbox"/> worker safety during animal handling <input type="checkbox"/> chemical use and hazard communication <input type="checkbox"/> preventing slips, trips, and falls <input type="checkbox"/> machinery with moving parts / machine guarding (e.g. guarding of PTOs, guarding of power transmission, equipment operation) <input type="checkbox"/> confined spaces (including manure storage) <input type="checkbox"/> silage management <input type="checkbox"/> sources of hazardous energy (e.g. electrical systems, controlling hazardous energy while performing equipment maintenance through Lockout Tagout, etc.) <input type="checkbox"/> noise <input type="checkbox"/> other: _____ 	<p><i>Interview.</i></p>
<p>8. When a hazard has been identified, does the farm work to abate it? Best practice is to use a consistent method, like the Hierarchy of Controls method. <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	<p><i>Interview.</i></p>

<p>9. Does the farm keep records of safety incidents (e.g. OSHA 300 log) and near miss events?</p> <p><input type="checkbox"/> YES, for both <input type="checkbox"/> YES, but only for safety incidents <input type="checkbox"/> NO</p>	<p><i>Interview.</i></p>
<p>10. Do all new employees, including family members, receive safety training?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>10a. If yes, please select which of the following topics are covered during initial safety training [note: training in some topics is required by OSHA. Refer to the federal and state legal fact sheets]:</p> <ul style="list-style-type: none"> <input type="checkbox"/> how to report safety concerns <input type="checkbox"/> steps for handling workplace injuries and accidents <input type="checkbox"/> CPR and/or administering first aid <input type="checkbox"/> emergency preparedness <input type="checkbox"/> worker safety during animal handling <input type="checkbox"/> chemical use and hazard communication <input type="checkbox"/> preventing slips, trips, and falls <input type="checkbox"/> machinery with moving parts / machine guarding (e.g. guarding of PTOs, guarding of power transmission, equipment operation) <input type="checkbox"/> confined spaces (including manure storage) <input type="checkbox"/> silage management <input type="checkbox"/> sources of hazardous energy (e.g. electrical systems, controlling hazardous energy while performing equipment maintenance through Lockout Tagout, etc.) <input type="checkbox"/> noise 	<p><i>Interview.</i></p>
<p>11. Is safety training documented?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>	<p><i>Document Review.</i></p>
<p>12. Do employees, including family members, receive refresher safety training? For example, through monthly safety talks.</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>	<p><i>Interview.</i></p>
<p>13. Do employees, including family members, receive refresher training following a near miss or safety incident?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>	<p><i>Interview. Optional Document Review.</i></p>
<p>14. Does the farm provide functional fire extinguishers, smoke alarms and carbon monoxide detectors in all farm-provided housing?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no farm-provided housing</p>	<p><i>Observation (ideally); Interview (when observation is not feasible).</i></p>
<p>15. Are emergency contacts and phone numbers provided for housing occupants?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A, no farm-provided housing</p>	<p><i>Observation.</i></p>