



PERC Pesticide Educational
Resources Collaborative



Building Bridges

A pesticide inspector's guide for conducting culturally sensitive Worker Protection Standard inspections

September 2024



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Disclaimer:

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"Across states, our land speaks many languages. By understanding cultural perspectives originating outside of our own country, we can bridge the gap and cultivate a more inclusive agricultural landscape. This enriches the entire food system, benefiting not just end consumers, but everyone involved in bringing our food from the field to the table."

-J. Gibbs (Author)



Photo: University of Arizona Cooperative Extension

Questions about this guide?

This guide was developed through a collaboration with the Pesticide Educational Resources Collaborative (PERC). For questions, email PERC at PERCsupport@ucdavis.edu.

Government Acronyms Used in this Guide

The following acronyms are frequently used throughout this guide and refer to government agencies. Additional glossaries for Technical Jargon, Language, and Spanglish have been provided within the guide contents.

EPA: United States Environmental Protection Agency. This agency is responsible for safeguarding U.S. air, land, and water through regulations, research, and enforcement policies.

OSHA: Occupational Safety and Health Administration. OSHA keeps America's workers safe by setting standards, offering guidance, and enforcing regulations in workplaces. Some states have state-based OSHA departments who assist or oversee WPS inspections. Although the EPA sets WPS rules, OSHA may still cite farms for general safety hazards that may be related to pesticide use.

US DOL: United States Department of Labor. The US DOL oversees labor laws, ensures fair employment practices, and does some work to promote safe working conditions. This department also plays a significant role in overseeing the H-2A visa program, which is discussed in this guide.

USDA: United States Department of Agriculture. The USDA exists to support agriculture, food safety, and rural development in the US. The USDA supports several research projects on pesticide application methods that could inform the WPS.

WPS: Worker Protection Standard. An EPA rule to protect agricultural workers and pesticide handlers from the adverse health effects linked to pesticide exposure. Advanced details about WPS can be found outside the scope of this guide.

I. Welcome to Building Bridges

A Guide to Culturally Sensitive WPS Inspections

The Environmental Protection Agency (EPA) Worker Protection Standard (WPS) [40 CFR Part 170] is a federal regulation designed to reduce the risk of pesticide poisonings and injuries among agricultural workers (workers) and pesticide handlers working on agricultural establishments (including farms, fields, orchards, greenhouses, forests, and nurseries) in the United States. The WPS offers protection to millions of agricultural workers (people involved in the production of agricultural plants) and pesticide handlers [people who work with/handle pesticides (mainly mix, load, or apply pesticides)] that work at hundreds of thousands of agricultural establishments. The WPS contains requirements for pesticide safety education, notification of pesticide applications, use of personal protective equipment, restricted-entry intervals after pesticide application, decontamination supplies, and emergency medical assistance.

WPS inspections are crucial for protecting people from harmful pesticide exposure, and navigating cultural differences can add another layer of complexity to conducting a thorough inspection. But have you ever walked onto a farm or greenhouse and felt a disconnect during WPS inspections? Like the language, customs, or even unspoken rules were just out of reach, making it hard to connect with workers and truly understand their experiences?

In 2007, a guide, titled “Breaking Barriers: A pesticide inspectors manual for interviewing Spanish speaking agricultural workers on the Worker Protection Standard” (EPA)¹, was developed to provide WPS inspectors with practical strategies on addressing language challenges and conducting effective interviews with Spanish-speaking workers and handlers. This guide included a full Spanish language section with phonetic pronunciations and tips for working with interpreters.

¹United States Environmental Protection Agency (US EPA). Breaking Barriers: A Pesticide Inspectors' Manual for Interviewing Spanish Speaking Agricultural Workers on the Worker Protection Standard. United States Environmental Protection Agency, Dec. 2007.

This guide, called “Building Bridges,” was inspired by Breaking Barriers, although this resource focuses on a broader approach to cultural sensitivity, acknowledging a broader and increasing linguistic and cultural diversity of the U.S. agricultural workforce. Over the years, individuals engaged in the U.S. agricultural industry have become more and more diverse, from migrant workers whose roots lie in Latin America and Southeast Asia to multi-generational family farms passed down through generations of African Americans and Indigenous communities. Understanding the multiple languages and cultures woven into this fabric is crucial for effective communication, cultural respect, and ensuring the well-being of all those who are vital to U.S. agriculture.

This guide was made so that it could be more broadly adapted for training programs focused on language examples and case studies relevant to specific U.S. regions. For example, trainers could research local agricultural practices and backgrounds of workers and handlers in the area. Guest speakers and additional language training (Spanish or otherwise) could then be tailored to the region’s needs. In this guide, you will find that most examples pertain to Latin America/Spanish speaking individuals, but there are other examples as well.

Guide development was driven by multiple requests from stakeholders, including WPS inspectors, pesticide safety educators, and farmworker advocates from multiple states across the U.S., who highlighted the importance of cultural sensitivity in achieving WPS compliance and in overall occupational health and safety. Additionally, this guide aligns with recommendations from the 2024 Farmworker and Pesticide Workgroup of the U.S. EPA’s National Environmental Justice Advisory Council, highlighting some of the group’s broader environmental justice efforts.² During this workgroup, there was a call for increased cultural competency training opportunities and continued education for WPS inspectors. In addition, the workgroup called for the hiring of more bilingual inspectors, but discussions centered on the need for incorporation of additional languages other than English and Spanish. Meeting attendees emphasized that both language barriers, cultural differences, and fear of retaliation can hinder communication and understanding during inspections.

This Building Bridges guide will provide you with some practical tools and insights to enhance culturally competent communication during your WPS inspections. The guide will focus on cultural competency concepts, recognizing potential communication challenges and adapting your approach for more effective interviews and interactions. The guide will provide tips on how to build rapport and trust (among employers, workers, and handlers), recognize how cultural norms can influence communication, and navigate the use of multiple different languages in U.S. agricultural production.

This guide will not make you an expert on every culture represented by the U.S. agricultural workforce. However, it will serve as a tool and motivate you on your journey to become a better inspector.

²United States Environmental Protection Agency (US EPA) National Environmental Justice Advisory Council. Public Meeting. Meeting Summary. Houston, Texas, 23 Apr. 2024.

The guide was developed in 2023-2024 based on focus groups involving 22 WPS inspectors from 16 states (Arizona, California, Colorado, Florida, Georgia, Kentucky, Idaho, Maryland, Michigan, North Carolina, Oregon, Vermont, Virginia, Washington, Wisconsin, and Wyoming), seven EPA regions, and two Native Nations. Additional focus groups were held with 27 farmworkers who had experienced or been a part of previous WPS inspections. These focus groups involved discussion of real-world experiences and best practices in the field during WPS inspections, and focused on timing and selection of interviews, language barriers, building rapport, and challenges.

Aim of this Guide

- 01** **Enhance cultural sensitivity:** Equip WPS inspectors with skills to navigate cultural differences effectively during inspections. Prepare WPS trainers and educators to provide information to help prepare workers/handlers for inspections and interviews.
- 02** **Build WPS inspector confidence:** Motivate inspectors to address cultural diversity through preparation.
- 03** **Improve worker and handler involvement:** Employees should be comfortable in giving open, honest responses during inspections.
- 04** **Build trust among everyone involved in a WPS inspection:** Trust is important to maintain clear lines of communication between inspectors, employers, and employees.
- 05** **Break down language and jargon barriers:** Use practical tools and strategies to overcome language limitations and understanding of concepts.

Who is this guide for?



- WPS inspectors
- Building Bridges (Cultural Sensitivity) trainers
- WPS educators and trainers
- Other individuals who are interested in cultural competency and overcoming the many challenges related to language barriers, cultural norms, and cultural values in agricultural health and safety

We hope that this guide will motivate you to continue to build your own bridges, increase cultural sensitivity, and improve the WPS inspection process in the field.

Why “Building Bridges”?

This guide is called building bridges because it goes beyond just trying to learn cultural facts about a working population. The “bridge” emphasizes that although two individuals may be different, they are still connected. It is a metaphor for creating a more inclusive and collaborative environment during WPS inspections.



II. Cultural Sensitivity and WPS Inspections

A. What is cultural sensitivity?

Cultural sensitivity (sometimes called ‘cultural competency’) refers to the understanding and respect for diverse cultural backgrounds, values, and belief systems. It involves having the tools and skills to effectively communicate and interact with individuals from diverse cultural backgrounds. Due to the rapid and constantly shifting demographic of the U.S. agricultural workforce, this is crucial for WPS inspectors.

Many professions in the U.S. require some form of cultural sensitivity education. These professions may include health care workers, social workers, educators (in a school environment), and law enforcement officers. For example, health care workers must understand how cultural practices impact diet, hygiene, or traditional medicine as these are all related to individual health outcomes. Elementary school teachers may be interested in tailoring their teaching methods to address cultural diversity among youth in their classrooms. Police may want to demonstrate cultural understanding to build rapport among community members so there is reduced fear and suspicion when reporting local illegal activity.



Photo: University of California Regents



Photo: University of California Regents

Typical cultural sensitivity educational programs involve:

- Becoming more aware of cultural biases (both your own and other individuals') and overcoming related challenges
- Learning about communication challenges and changing communication styles
- Building empathy by encouraging participants to learn about different cultural backgrounds and historical influence
- Developing active listening skills, such as how to engage with the person speaking and interpret their body language
- Independently building cultural knowledge and appreciation
- Preventing misunderstandings that may arise due to cultural differences
- Information on continuous learning and staying updated on cultural dynamics, since cultures evolve over time

In the field of occupational safety and health, culture is defined as a system of shared beliefs that affect how workers perceive, understand, and adapt to their safety concerns at work.

Some examples include:

- An employee and their employer understand the safety policies and who is responsible for adherence.
- Employees have clear lines of communication with superiors for appropriate reporting.
- Employees appropriately perceive worker dangers and are given tools to adapt to workplace changes.
- Employees are aware of the nature of an inspection and are prepared to discuss their language needs during the inspection.
- The employer and employees are aware of risk perception or safety belief differences if they are from different cultural backgrounds.

These examples were adapted from Flynn, M.A., Castellanos, E., Flores-Andrade, A. (2018). Safety across Cultures: Understanding the Challenges. *Professional Safety* 63(1): 28-32.

B. Cultural sensitivity and the future of work

Cultural sensitivity education for agriculture, safety, and health professionals (including WPS inspectors) will become increasingly important as the global economy grows and diversifies. WPS professionals who develop their ability to work effectively in cross-cultural settings will be better positioned to promote workers' health, safety, and well-being in the increasingly global economy.

Since the creation of the previous guide in 2007, U.S. farmworkers have continued to become more culturally diverse. Strong trends in immigration from Mexico and Central America drives the Latino/Latina surge, and Asian and Hmong workers continue to increase, too (especially in California). Florida has been a major destination for Caribbean farmworkers in recent years. Women are playing a substantial role, making up about a quarter of the active agricultural workforce. This all makes a case for WPS cultural sensitivity education as a good investment in career advancement and stability.

Understanding cultural norms and values

Understanding cultural norms and values is crucial for effective communication with individuals from different cultures, whether a language barrier exists or not. Every culture has its own set of rules about behavior which affect verbal and nonverbal communication. This guide will discuss some of these norms like when to make eye contact and when not to, how to be an active listener, the meanings of different gestures, and even the importance of greetings and appearance. Differences in cultural norms and values often lead to communication problems.



Cultural Norm

A cultural norm is an unspoken, unwritten rule of day-to-day behavior and interaction among people of a given culture. For example, in the U.S., many people greet one another with a firm handshake and then immediately engage in a brief casual conversation about the weather or recent events. An individual from El Salvador may instead prioritize hospitality and insist on offering food or drink when an initial greeting is made.

Cultural Values

Cultural values are a common set of ideas, beliefs, attitudes, opinions, and principles within a given culture. For instance, punctuality (being on time) may hold high significance or value in some professional environments. However, in some cultures, punctuality is viewed with more flexibility and a certain degree of lateness may be accepted. Someone unfamiliar with this norm may become frustrated or confused, potentially misinterpreting the delay as unprofessionalism or disrespect. Other examples of cultural norms and values will be described throughout the guide.



Discussion Question:

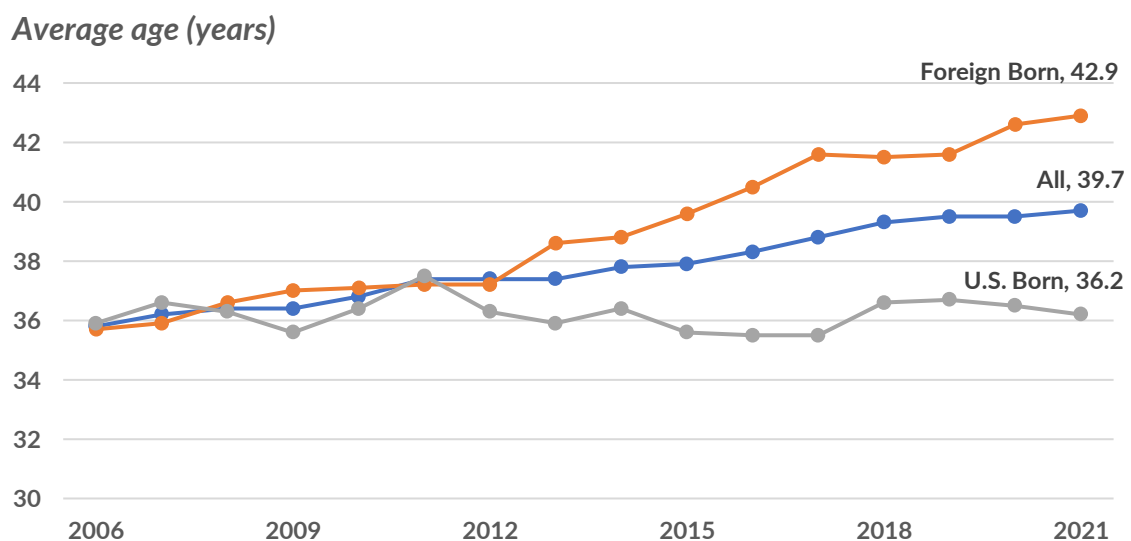
Have you ever completed a cultural competency education program or training before? If so, what topics were covered? Was it for your current or a previous role?

Notes:

C. Demographics on Agricultural Workers in the U.S.

- 70% of workers in the U.S. agricultural industry are foreign-born. As of 2020, most farmworkers (70%) were born outside the U.S., with Mexico being the primary source country (63%). (*National Center for Farmworker Health, 2022 Farmworker Data Factsheet*)
- 78% of farmworkers self-identify as Hispanic. (*Source: National Center for Farmworker Health, 2022 Farmworker Data Factsheet*)
- While historically male-dominated, there has been a shift to more female farmworkers. In 2021, the proportion of female farmworkers rose to 28.1%. (*USDA ERS, Farm Labor, 2021*)
- The average age of farmworkers in the U.S. tends to be younger than the average age of the farm owner operator. The average age of farmworkers is around 41, with 37% under 35 and 44% between 35 and 44, indicating a relatively younger workforce. (*National Center for Farmworker Health, 2022 Farmworker Data Factsheet*)
- Overall, farmworkers are getting older. Although the average age of farmworkers is younger than farm owner operators, the average age of farmworkers has been slightly on the rise since 2006.
- Since 2005, more and more H-2A workers have been hired on farms to fulfill labor shortages. H2-A workers have been increasing particularly in the states of Florida, California, Georgia, North Carolina, and Washington. More details about H-2A workers are provided in the “Know Before You Go” section of this guide.

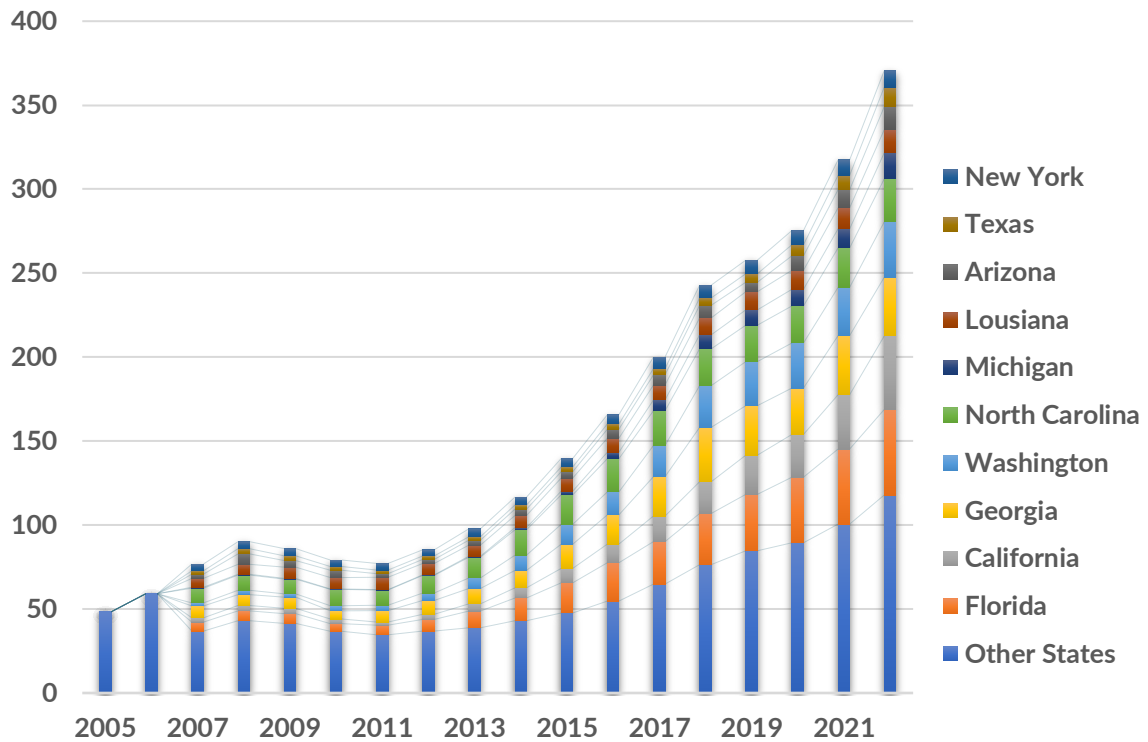
Average age of U.S. farm laborers/graders/sorters by place of birth, 2006-2021



Source: USDA, Economic Research Service using data from U.S. Department of Commerce, Bureau of the Census, annual American Community Survey.

U.S. H-2A (temporary agricultural employment of foreign workers) positions certified by State, fiscal years 2005-22

Seasonal positions certified (thousand)



Note: State—level data are not available for fiscal years 2005-06. Individual States identified in the chart were the top 10 in the number of H-2A jobs certified in fiscal 2022. About 80 percent of job certifications result in visas being issued to H-2A workers—some employers do not follow through to hire H-2A workers and some workers fill two certified jobs.

Source: USDA, Economic Research Service using data from U.S. Department of Labor, Office of Foreign Labor Certification.

You may consider doing your own research on farmworker demographics to ensure that you are tailoring your outreach and inspection strategy to address the evolving needs and vulnerabilities within this diverse workforce. Below are some examples of organizations that frequently publish data on farmworker demographics in the U.S.:

[Disclaimer: These organizations are provided as examples for informational purposes only and do not constitute an endorsement by federal agencies]

Government Sources

1. **US Department of Labor National Agricultural Workers Survey (DOL NAWS):** This is an ongoing comprehensive survey collecting detailed data on the demographics, employment conditions, and health of workers in the US crop production industry.
2. **USDA Economic Research Service (ERS):** The ERS “Farm Labor” page is a valuable resource dedicated to understanding the economic and social aspects of farm labor in the United States.
3. **Bureau of Labor Statistics (BLS):** The Bureau of Labor Statistics (BLS) publishes reports on the changing nature of farm employment. While the BLS offers valuable insights into farmworker employment, it may not be a complete source of demographic data since it may miss informal or undocumented workers. However, the BLS data provides reliable information on wages and job types.

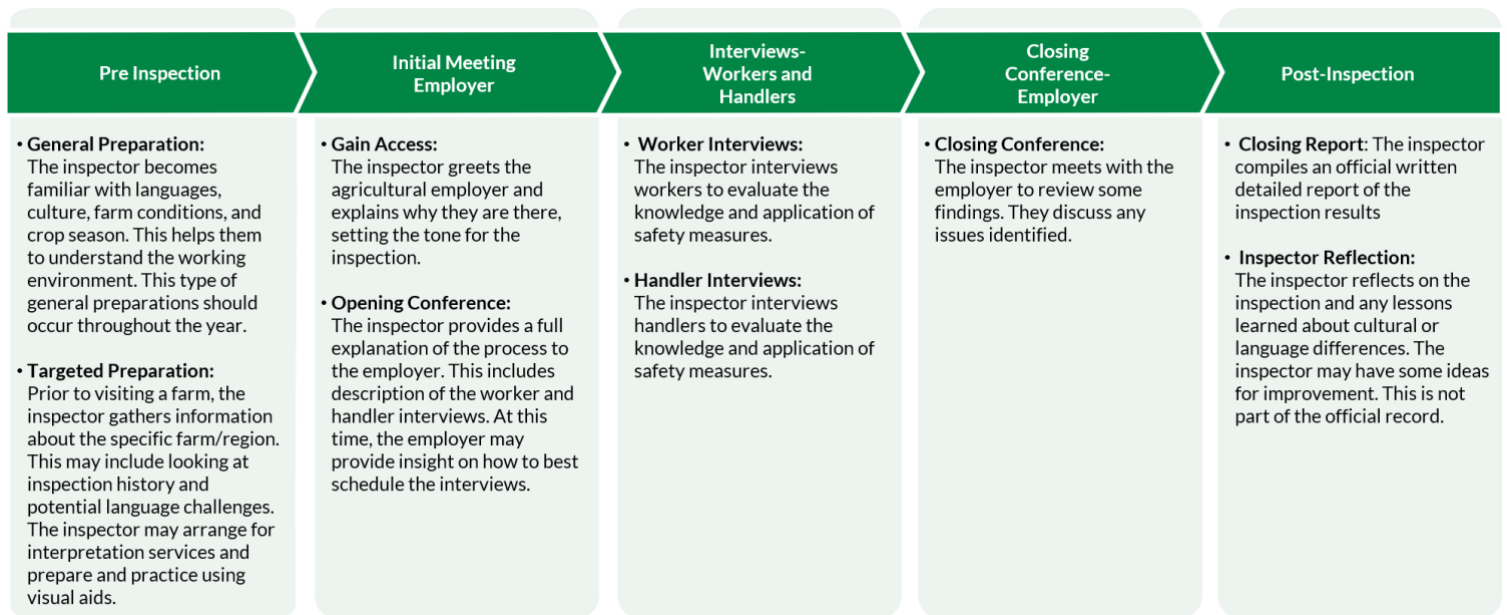
Private or Nonprofit Sources

1. **National Center for Farmworker Health (NCFH):** The NCFH creates data fact sheets about current key statistics on the demographics of agricultural workers in the U.S.
2. **Center for Migration Studies:** The Center for Migration Studies is a New York-based think tank and educational institute researching international migration, fostering understanding, and advocating for policies that respect migrant rights. Occasionally, this center will publish reports on farmworker trends in demographics.

III. Phase 1 Pre-Inspection

Know before you go

It is important to have a plan and be familiar with the farm and the community culture of the workers and applicators before you perform an inspection. In this section, we will cover some topics that you will want to become familiar with prior to performing a WPS inspection.



A. Cultural Background

Language(s) Used. As previously discussed, data from the US National Agricultural Workers Survey (NAWS) shows that over half of U.S. farmworkers feel most comfortable conversing in Spanish. It is important to identify the predominant language(s) spoken by the workers and handlers on the farm that you will be visiting. Title VI under the Civil Rights Act (1964) requires providing language assistance to individuals with limited English proficiency. Language differences may then be addressed by bilingual inspectors, resources, or using interpretation tools beforehand. It is also important to know the languages spoken by the owner/operator, the workers, and the handlers as these all may be different. For example, you may learn that the owner/operator prefers to speak English, the handlers speak mostly English (with some Spanish Slang), but then the workers speak both Spanish and Haitian Creole. You may find that some workers understand basic phrases, commands, and greetings in English from everyday interactions—but they still may perform most of their communication in their native language.

As the inspector, you will need to be prepared to encounter multiple language understanding scenarios while on the farm, since workers and handlers may be experiencing different levels of English fluency.

Literacy. Learn about the potential impact of literacy rates in the region that you are working. Data from the NAWS has indicated that farmworkers face significant challenges in the U.S., including limited access to education. This, along with advanced age, can impact literacy rates in this population. For example, a survey by NCFH has indicated that ~4% of farmworkers have not completed any schooling, and that about a third (35%) have completed grades K to 6. In addition, more than half of farmworkers surveyed stated that they could not read or understand English “at all” or only “a little.” Literacy rates among farmworkers may be difficult to determine due to language barriers and cultural differences in how literacy is defined and measured.

Since it can be difficult to measure literacy rates and know the exact literacy rates among farmworkers in your region, you may be able to learn a lot from previous WPS inspections and the farm owner/employer prior to going into worker and handler interviews. It is important to recognize that most forms of literacy are measured with standardized tests, which may not be culturally appropriate or performed in the individual’s main language.

If you have followed this guide and made a good impression during your greeting, then the worker or handler is more likely to express themselves freely and request photos, visuals, or demonstration when needed.

Remember that although literacy opens doors to information and the ability to communicate, it doesn’t define a person’s intelligence. Problem-solving, spatial reasoning, and emotional intelligence can thrive regardless of literacy levels. Addressing literacy directly during an interview with a worker or handler is not recommended, since it can lead to embarrassment and shame.

It is best to come prepared to address issues with literacy with the following tips:

- If a worker or handler demonstrates difficulty when looking at written material, shift the focus back to communication and conversation.
- Use visuals (like photos, graphics) or gestures (like pointing to the item that you are talking about) to showcase the question that you are referring to.
- Perform a demonstration. For example, you might point to the item you are talking about, show a Safety Data Sheet, or show the PPE that you are referring to.

Use of Slang. The use of slang is common on farms and will differ by region. As a new inspector, it may feel difficult to learn all the new terms, but often this gets better with experience. “Spanglish” is common because it is a fusion of Spanish and English, often used for convenience. If a farm employs workers from multiple countries or diverse backgrounds, they may also borrow words from each other’s language to describe specific tasks or tools. Acronyms and abbreviations can be made up on farms to describe complex tasks or items. The use of slang can be influenced by factors like age and gender. At the end of this guide, in Glossary B, you will learn about common Spanglish phrases used during WPS inspections. When interviewing workers, you may start to appreciate and understand some slang phrases and their use can help break down language barriers and gain a deeper understanding about culture.

Note: It can be difficult to determine if slang or a “Spanglish” term is professional or inappropriate. Stay clear of slang if it feels offensive, discriminatory, or derogatory because it may only perpetuate harmful stereotypes. Don’t use “Spanglish” unless you are confident in using the word or phrase and are familiar with its meaning.

If it is a word or phrase used on the farm, but “feels wrong” for you to say—then it probably is. It is best to do some research on the type of slang terms used, and if they are helpful or harmful, prior to visiting the farm or interacting with workers and handlers.



Discussion Questions:

Have you encountered the use of slang in your professional environment or during inspections? If so, was it appropriate or inappropriate? How did you know?

Immigration status.

Note: A person's immigration status is a sensitive and private matter and should never be discussed during WPS interviews.

Asking about immigration status can be perceived as discriminatory, especially if it's targeted towards individuals who appear to be foreign-born or who belong to certain racial or ethnic groups. Engaging in immigration-themed discussions gives a false impression that the inspector is there to deport someone. Even if well-intentioned, due to perceived authority, this can be hurtful and reinforce negative stereotypes about immigrants. If the worker or handler asks about immigration and whether you are there to ask about it (or enforce the rules), clearly indicate that you are there only for the purpose of the WPS inspection.



Photo: University of California Regents

Notes about H-2A Visa Workers

The H-2A program is important because it allows U.S. agricultural employers to bring foreign workers to the United States to perform temporary or seasonal agricultural labor. This program is overseen by the U.S. Department of Labor and the U.S. Citizenship and Immigration Services. At the time of constructing this guide, a large proportion of H-2A workers are coming to the U.S. to work from Mexico, Nicaragua, Argentina, Guatemala, Honduras, Jamaica, and Peru. This is subject to change. H-2A workers are an important labor force for agricultural employers because they assist with diverse farmwork tasks like planting, cultivating, harvesting crops, and tending to livestock. These workers are crucial for states with intensive agriculture that rely heavily on seasonal labor, with major destinations including Florida, California, Washington, North Carolina, and Georgia. As you become more familiar with WPS inspections, you may be likely interviewing H-2A workers.

Compared to more established farmworker communities in the U.S., H-2A workers often differ in their demographics. Below are some differences as found in the NCFH H-2A Guest Workers Fact Sheet (2017):

- **Younger:** They tend to be younger than the average farmworker in the U.S.
- **Predominantly male:** The majority are male, unlike the more gender-balanced composition of other farmworker communities.
- **Limited English proficiency:** Many have limited English language skills, creating additional language barriers.
- **Often receive competitive wages:** H-2A workers are paid based on the Adverse Effect Wage Rate (AEWR). Agricultural employers would like to keep these workers and tend to pay them fairly, as they would not like them to move elsewhere, and fair pay is an important aspect of employee retention. Sometimes the visa program imposes restrictions on worker mobility, limited their ability to change jobs easily until the following year. If H-2A workers are not paid well, they tend to relocate to another state or employer in future years. According to focus groups of both WPS inspectors and farmworkers, in some states this could be lower than the average wage for farmworkers in the same region.
- **Single instead of multi-family:** Differing risk perceptions: Since these workers may be in the U.S. only for a set period (and may be away from their family) they may not perceive risk from exposure to pesticides in the same way that more established and local farmworkers do. For example, an H-2A worker may be living alone or with a group of other workers, rather than with their family. Therefore, when engaging in conversations about “take home pesticides” exposure, the argument for “protecting your family” may not be as convincing.

In comparison, long term immigrant workers begin to adopt some U.S. customs and culture after spending prolonged time in the country. For example, they may have increased language (English) proficiency and use of slang (“Spanglish”) at the workplace. They may adopt some U.S. customs and mannerisms (such as a strong handshake) and have access to broader social network. If they feel supported, they

will likely be more comfortable engaging in an interview or performing the interview alone. They may be less intimidated by the inspection process. It is important to remember that long term workers may still struggle with feelings of isolation and discrimination due to their immigration status.

It's important to be fully prepared when interviewing H-2A workers. Learn more about the number of H-2A workers in your state.

Religion, Family, and Gender Roles. It is important to understand how religion, family, and gender roles can significantly enhance your interview effectiveness and cultural sensitivity. Understanding family structure and common gender roles may help you tailor your communication style and make sure that your questions and interview requests are culturally appropriate. You may encounter a farm, where one of the genders can perform the interview in English, but the other gender is still engaging in Spanish. Other farms may have younger generation employees that can perform the interview in English, but the older generation is still engaging in Spanish.

Prior knowledge helps navigate potential sensitivities and prevent unintentional offense. For example, in some cultures, if you are conducting a “private interview,” especially with members of the opposite sex, you may need specific protocols for the presence of a trusted intermediary, or the interview may have to be conducted in a small group setting rather than one-on-one. These cultures tend to be Muslim cultures (such as individuals from Afghanistan or Pakistan), or some Orthodox Jewish.

‘Machismo’ Culture

Machismo is a concept originating in Hispanic culture which emphasizes masculinity, strength, and stoicism. Traditionally, it is associated with traits in men and can manifest in suppressing emotions or feelings, physical prowess and risk taking, and head of household. The emphasis on physical strength, dominance, and willingness to take risks may lead to unsafe work practices or different perception of risk.

Family dynamics and gender roles can influence attitudes towards work, safety practices, and risk perception. Research suggests that women, on average, may tend to exhibit higher risk aversion than men at the workplace. This may be reflected even more in cultures that emphasize women’s societal role as caretakers and nurturers. This seems to be reflected in our focus groups, as many inspectors stated that women tended to remember more of their WPS safety training materials than men.

When learning about Machismo, it is important to avoid negative stereotypes. Some aspects of machismo can be positive, like providing and caring for one’s family or being resilient in tough situations. This concept is being challenged and reinterpreted by younger Hispanic generations. Remember that each worker has their own unique background, values, and motivations, regardless of their cultural heritage.



Photo: University of California Regents

Alternative Interview Strategies

Using a Chaperone: In some Muslim cultures, it might be considered disrespectful to interview a woman alone, especially on sensitive topics like workplace safety. Asking if she would prefer another female family member, friend, or trusted colleague to be present demonstrates cultural sensitivity and ensures her comfort during the interview. This could prevent misinterpretations and encourage open communication about potential safety concerns. The chaperone should not answer the questions for this individual—rather they are there to act as a witness, ensuring transparency and cultural respect. The chaperone should also be a peer (a worker or a handler) and not the employer.

Offering Off-site Interviews: You may consider offering to meet with workers or handlers at a more neutral location, like a public venue that makes them feel comfortable. Some suggested locations include community centers, worker health clinics, and public libraries.

Group Interviews: Some (not all) workers may want to organize a small group discussion (3-5 workers) in a safe space where they can answer the questions collectively, so they don't feel like the pressure is all on one individual. In WPS inspector focus groups, we learned that more outspoken individuals tend to overtake the group discussion. Therefore, this method is not preferred and should only be offered if there is no other alternative.

Work with Flexible Scheduling: If the workers really are not able to stop their work, offer an alternative scheduled time for the interview to accommodate their work schedule and minimize disruptions. This may even be later on the same day as the inspection.

Interviewing with an Interpreter: Conducting an interview with the assistance of a trained interpreter helps overcome many barriers to trust associated with difference in language, literacy, and cultural background. There are numerous options for interpretation, and these are reviewed in Section V., Translation and Interpretation.

Work Ethic. It is important to understand nuances and differences of cultural work ethic since it is crucial for successful collaboration. In addition, it will help you understand where and when to conduct WPS interviews. If a worker or handler feels like you are interfering with (not aiding) their work, then it could lead to resentment and not wanting to participate. For example, if you need to interview a worker who is quickly pruning at the height of pruning season (while being paid by the piece), you may need to wait for an appropriate break period rather than promptly interrupting them to interview. Interfering with “hard work” could be perceived as a loss of income and an implied lack of value. As an inspector, if you are familiar with the cultural norms of work ethic, you may better strategize about the best interview techniques.

Note: Focus groups with farm workers and handlers have revealed that the worker’s pay structure (salary/hourly/paid by the piece) is likely to strongly impact their willingness to participate in an WPS interview.

- Identify, in your initial meeting with the agricultural employer, the best time and place to interview workers and handlers with minimal obstruction to work.
- Inquire with the employer, if the workers and handlers will continue to be paid during the short period of the WPS interview. This is especially important if they are being paid by the piece, since more time for the interview process may be necessary.
- Show appreciation for the worker and handler’s time, and willingness to participate in the interview, even if it is a requirement.
- Be prepared with concise questions, interpretation, or visual aids so that the interview can be conducted in a short timeframe to minimize workplace disruption.



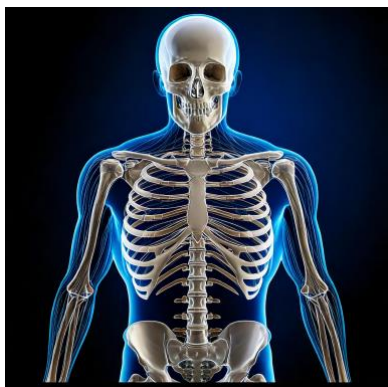
Photo: University of California Regents

For many cultures, hard work is a way to demonstrate loyalty and earn respect from superiors, as well as the agricultural employer.

Other Cultural Differences. Recognizing differences across history, food, and other cultural factors is crucial when interviewing individuals from other countries because it fosters respect. One other cultural difference likely to be encountered is the belief in “humoral medicine.” This medicinal concept is present in several cultures (e.g. Hispanic, Indian, Chinese, Islam) and teaches in maintaining a balance of bodily fluids or “humors” such as blood and phlegm for good health. Disruptions in this balance are often attributed to illnesses, rather than more direct “cause” and “effect” in Western Medicine. Many individuals could be participating in herbal remedies, dietary adjustments, and specific lifestyle practices due to this belief system.

This concept of “Humoral Medicine” may present challenges to WPS inspectors, due to:

- **Different priorities when it comes to health and safety:** Workers and handlers may prioritize humoral balance and treatments over conventional western safety practices. For example, a worker may shift the conversation to an herbal remedy or diet practice rather than following the WPS guidelines.
- **Communication challenges:** The worker may complain about symptoms in a way that you do not understand or attribute the symptoms to other causes. Keep in mind that you may still ask questions geared at collecting evidence to substantiate if an exposure occurred as the result of regulatory non-compliance. During these conversations you may find it challenging to explain complex scientific pathways (such as “exposures” and “health risks” of pesticides) due to differences in terminology.
- **Forcing adherence to Western Medicine standards:** Instead of feeling the need to “explain” these scientific concepts and their effects on the human system, it helps to focus on a common goal, such as “Pesticides are chemicals that can harm your body.”



Humoral Medicine

Photo: University of California Regents



Susto

‘Susto’ Belief in Hispanic Cultures

Susto is a folk belief prevalent in many Hispanic cultures. Susto attributes an illness or misfortune to a frightening experience causing "soul loss." Symptoms can range from anxiety and sleeplessness to physical complaints like fatigue and digestive issues. For many, Susto is a valid expression of personal stress and can even be associated with pesticide exposure. Treatments for Susto often involve more holistic and traditional healing practices, such as herbal remedies. If a worker is concerned about Susto, be ready to listen attentively and take notes without dismissing these beliefs. This is a complex topic, and it is worthwhile to seek out advice from others who have had field experience on how best to handle such beliefs. As an inspector, you may need to provide educational guidance on best practices and some practices are not likely to be followed without recognition of these belief systems.

Conceptual Cultural Norms. As previously stated, it is important to become familiar with the types of cultural biases that you may have, based on your own upbringing and experiences. These can be strongly impacted simply by your time spent living and working in the U.S. Researchers have spent a long time evaluating cultural views when it comes to interacting or discussing business at the workplace. This can be difficult, as some cultural differences are not immediately visible to the human eye. Some cultural differences are conceptual and abstract.

You may consider using an online tool, such as the Hofstede Country Comparison Tool, to learn about cultural norms and values prior to interacting with farmers and handlers of another culture. The Country Comparison Tool provides a valuable resource for anyone interested in understanding and navigating the complexities of national cultures. This tool is based on decades of research conducted by G. Hofstede with IBM employees in multiple countries. Select any combination of countries and visualize their scores on six cultural dimensions. This tool is publicly accessible, and users can freely access the tool without need for special permissions. *[Disclaimer: These tools are provided as examples for informational purposes only and do not constitute an endorsement by federal agencies.]*

Remember, any online tool that you find is a dynamic guide. Cultural differences are always shifting. These tools are not meant for you to define or stereotype a group of people—rather they help you navigate new situations that could have made you feel unprepared. The best thing you can do is seek local expertise and continue to gain personal experience.

B. Farm Conditions

Operation Size. It is important to understand the farm operation size, particularly when determining the number of workers and handlers required for the inspection and interviews. For smaller operations, immediate family exemptions also affect which WPS provision will apply (or if the operation is exempt). This information may not be required prior to the inspection, but the inspector may determine the farm size as they are approaching the farm.

Smaller farms may be viewed as “easier” since fewer individuals may be interviewed, but it can be difficult to ascertain when individuals have the strongest roles in pesticide use and compliance. Larger establishments will tend to have higher numbers of employees speaking multiple languages. These employees may have more specialized roles. This may necessitate interviewing more workers to assess overall worker safety and compliance. Large farms may have designated safety personnel or managers to assist with the interview and provide input on interview strategy. It helps to identify these individuals early in the process during the initial meeting with the agricultural employer. On smaller farms, the owner/operator may be playing dual roles (with compliance and safety management).

If you understand the size of the operation before conducting interviews, you will be able to conduct more targeted and efficient inspections and ensure adequate worker representation.

Crop Requirements. Different crops have specific planting, pesticide application, harvesting dates, and seasonal workflows. Before performing a WPS inspection, you may refer to a local crop calendar, like the ones provided by the USDA.

Crop Calendar Charts

The USDA publishes crop calendars, which are valuable resources for WPS inspectors because they provide detailed information on various aspects of crop protection throughout the year and provide region-specific information.

After several years of experience, you may become familiar with the “busy periods” of agricultural production, and it will help you navigate some of the difficulties in interviewing.

The USDA crop calendars can be found on the USDA website, with state-specific harvest calendar information.

<https://ipad.fas.usda.gov/ogamaps/cropcalendar.aspx>

Crop Requirements. To ensure that you are interviewing workers and handlers at the appropriate time, you will need to be on the farm within a 30-day time frame of pesticide application. You may find yourself on the farm during a busy season and this will present challenges for interviewing. As a WPS inspector, you are aware that different tasks within the crop cycle carry varying risks of pesticide exposure. Knowing packing, pruning, or field work schedules will allow you to observe these tasks directly and assess proper PPE use, educational needs, and adherence to exposure prevention measures. If you are familiar with the seasonality of the work being performed, you will be prepared with how “busy” the workers are in the field and any potential challenges that you may encounter when performing interviews. If workers are working by hand, they may be more able to break for an interview at request. However, you may need to be prepared for a break in operation or shut down for the interview.

Differences in worker and handler pay. Before interviewing workers and handlers, it helps to know if workers or handlers are paid based on salary, hourly, or piece rate. Explain to the employer that this will help you in understanding and being respectful of the worker or handler’s time. In most states, you will not have the authority to inquire about pay specifics (such as amounts/hourly wages). Only inquire about pay structure. A single farm may utilize a variety of pay structures due to the seasonality of the work. On the next page are some specific pay structures and how they may impact WPS interviews.



According to focus groups of both WPS inspectors and farmworkers, trained pesticide handlers are often more likely to be salaried employees as compared to workers.

Table 5: Pay structure and impact on WPS interviews

['Potential Impacts on WPS Interviews' were determined from input from focus groups of both WPS inspectors and farmworkers]

| Pay Structure | Description | Potential Impact on WPS Interviews |
|---------------|--|--|
| Salaried | Receive a fixed salary regardless of hours worked, often offering job security and benefits. These workers might be supervisors and equipment operators. Focus groups have shown that handlers are more likely to be salaried than workers. | These workers may attain higher education levels than other forms of paid workers. They will receive pay, even when being interviewed. Salaried workers typically fall into two types: A) They may feel less pressure to report concerns due to perceived job security; or B) They may be very loyal to the employer and may not want to bring up problems or issues. Due to this loyalty, they may be concerned that correcting the problem will be costly to their employer. |
| Hourly | Paid per hour worked, offering predictability but potentially inconsistent income depending on the number of hours offered. Common roles include pickers, packers, and general laborers. This is often how H-2A Visa workers are paid. | Likely to be paid during the interview process. These workers might be more hesitant to raise issues for fear of reduced hours (see 'passive forms of retaliation'). |
| Piecework | Earn based on the amount of work completed (e.g., number of fruits picked, bins filled). This incentivizes productivity but can lead to safety shortcuts and longer hours. Piecework, for example, may pressure workers to prioritize speed over safety, increasing exposure risks. Often want to work more hours. | These workers may view the WPS interview as pulling them away from their work, and their pay. You will need to consult with the agricultural employer to see how they may be paid for their participation in the WPS interview. These workers might be more hesitant to raise issues for fear of reduced work (see 'passive forms of retaliation'). |
| Part-time | Work fewer hours than full-time employees, potentially offering flexibility but often limited benefits and job security. Often want to work more hours. | Like hourly workers, these workers may be more hesitant to raise issues or concerns for fear of reduced hours. |

Previous Inspections. As part of your pre-inspection duties, you may review the agricultural establishment's inspection history to ensure that all prior violations (if applicable) have been corrected. Understanding the previous inspections can also provide context for your own interviews. You may tailor your approach based on concerns addressed in previous visits. Showing familiarity with past inspections demonstrates your professionalism and can help build trust with the employer, as well as workers and handlers who were present for the last inspection. Previous inspection reports might reveal how farmworkers responded to the questioning style or language used in the past interviews. If health and safety issues were brought up in a previous report, you may see if these issues have or have not been addressed. Prior inspection reports can help you adapt your own approach to be more culturally appropriate. For example, if a previous report mentioned reluctance to interview due to fear of job loss or passive retaliation, you may strategically plan how to better introduce yourself to reduce that fear.

Confidentiality

Remember, when accessing previous inspection reports, it is important to maintain confidentiality and privacy concerns in those reports. Avoid themes of blame or judgment based on previous inspection results. Never mention names or other personal identification cues.



Discussion Questions:

Is it possible to address cultural differences while also avoiding stereotypes? What are some of the challenges with this?

At this point, you may be wondering if it is possible to respect cultural norms without resorting to stereotypes. At the end of the day, the person that you are interviewing is an individual. Even though you have “done your research” on cultural norms, you will treat each interviewee with respect and avoid making assumptions based solely on the background knowledge that you acquired. Respectful dialogue during the interview involves a lot of active listening.

Avoid generalizing. Avoid making brash sweeping statements about an entire group of workers based on limited information. Don't use slang or inappropriate language if it feels offensive, discriminatory, or derogatory. Some slang will also perpetuate harmful stereotypes. Be aware of media portrayals, memes, and popular narratives that perpetuate harmful generalizations and never bring these up during interactions with workers.

You may notice that some workers and handlers may joke or make fun of cultural differences and language barriers during the interview. It is best to avoid these inside jokes as an outsider. Although laughing with the group may feel like you are building comradery, it is best to smile and move on to the next subject. Instead, focus on commonalities and always do your best to maintain professionalism.



Discussion Questions:

If you are in the field and someone uses or applies a harmful stereotype, how would you go about shifting the focus back to a successful interview?

Case Study 1

Maria Hernandez-Smith, a seasoned EPA WPS inspector in Washington State, stands amidst the bustling chaos during spring thinning season at one of the largest apple orchards in the region. Today's challenge will be finishing some effective interviews within all the activities on the farm. She grew up in the area and is very familiar with the season. Things have certainly changed. When Maria was younger, the workers performed all thinning with ladders and it was a long process. Nowadays, they use a moving platform to get the work done quickly.

After the initial meeting, which goes successfully, the agricultural employer indicates he is swamped with paperwork and gestures vaguely towards the workers. She spots Pedro, a Central American farmworker, who is getting ready to drive a moving platform with several workers on the back. He is wearing protective eyeglasses since he is operating the tractor through the foliage. He seems to be the "leader" of the group, telling the other workers what to do. However, she notices he is working slowly, is laughing with other workers, and does not seem to be in a hurry. She thinks that she may convince him to engage in an interview.

Approaching with warmth, Maria opens with her practiced greeting, in Spanish. But Pedro continues talking with some of the other workers on the platform. He looks apprehensive and barely acknowledges her. He offers a curt nod and mumbled responses that are barely audible. He continues boarding the tractor

and starts it up, yelling “Vamos!” at the last few workers boarding the platform.

Maria steps aside from the row and repositions herself nearby, out of the tractor’s path, patiently observing. Pedro drives the platform through the field and the workers thin trees for 10 or 15 minutes. Maria looks down at her watch and sighs. This is the only group in the field.

At the end of the row, there is a bell followed by the halt of the tractor. Pedro sighs, wipes sweat from his brow, and mutters, "Descanso" (break). His tense frame loosens as he places the tractor in park, turns it off, and hops down.

Seizing the opportunity, Maria repeats her introduction, her voice now audible. This time, Pedro listens as he is no longer preoccupied with driving the other workers. Maria asks about his break policy and if it is fine to interview currently, respecting his need to step away from the drive. Pedro agrees, informing Maria that the workers need 10 minutes or so to recover between sets of rows. Maria performs her greeting and tells Pedro about WPS and the need for interviews. He nods and she asks a few questions about pesticide application periods, safety gear, and communication protocols. Pedro understands her questions in Spanish and explains some concerns he has about malfunctioning equipment, namely some leaks in the sprayer attachment to the tractor. He regularly uses the tractor for other tasks, and complains about having to clean up the spray contamination the mornings after spray. He tells her that he would like access to the same PPE that the pesticide handlers have.

The short break ends and the conveyor roars back to life. Maria remembers to thank Pedro for his honesty and spending time with her during the short intermission.

Case Study 1 highlights the importance of cultural awareness for WPS inspectors. It is important to understand the nature of farm work and respect for workers' priorities.



Discussion Questions:

How did Maria recognize the rhythm of the work environment?

Why do you think she selected Pedro for this interview?

Case Study 2

Halima adjusts her headscarf against the desert sun as a WPS inspector named Aisha approaches during a routine inspection on a lettuce farm. Aisha smiles, walking toward Halima with her hand on her chest. "Assalamu Alaikum, Halima. My name is Aisha and I work for the state agriculture department. We are here today to talk about some of the safety protocols on this farm. . . . " Aisha finishes her greeting in detail.

Halima's eyes are apprehensive, and her body language soon shows she is uncomfortable. Right away, she can tell that Aisha is a government authority. "Wa Alaikum Assalam," she murmurs, glancing toward the shed and pulling down her headscarf. Aisha notices her hesitation, as she is familiar with the religious protocols and cultural norms of the farm working community. "Would you prefer to speak indoors, Halima?" she asks gently. Halima nods and they go indoors. As they settle, Aisha begins to get out her clipboard but notices that Halima is looking around the room and avoiding direct eye contact. She is not responding to the questions. Aisha has done her preparatory work and notices these cues. In some Arab cultures, women might feel uneasy discussing personal matters, especially with men, or without the presence of a trusted female companion. So, she adapts her approach.

"Halima," Aisha said, "I understand if you'd feel more comfortable doing this short interview speaking with someone you know. Would you like me to request your sister, who was with you in the field, or another woman close to you to be present during the interview?" Halima's shoulders relax. "Yes, my sister," she whispers, pointing to another figure in the field. Aisha excuses herself and approaches the other woman, explaining her role. The woman, Fatima, nods in understanding and joins them. With Fatima at her side, Halima can confidently complete her interview.

When the interview concludes, Aisha expresses her gratitude. "Thank you, Halima, for your time today. And Fatima, your presence made this go so well."



Discussion Questions:

Share one time when you were in the field and encountered a cultural difference that made your work more challenging. What did you do (or would you do) to address it?

IV. Phase 2 Gaining Access

Building Trust

Building trust is the most essential element of this guide because it is crucial for effective WPS inspections. The below diagram shows the typical process for conducting a WPS inspection, which involves pre-inspection preparation, an initial meeting with the agricultural employer, and worker and handler interviews. During this process, inspectors must first develop an understanding of how the farm operates and the dynamics between employers and employees. Culturally sensitive skills equip inspectors to appreciate the employers', agricultural workers', and handlers' diverse backgrounds, communication styles, and languages. For a successful inspection, both employers and workers should feel prepared to discuss potential pesticide-related hazards through their own cultural lenses. Trust fosters this open communication, preventing valuable insights from remaining hidden. Without it, an inspection could be ineffective, leaving the inspector with an incomplete picture.

For example, a worker may hesitate to give full responses if the inspector proceeds using a pesticide-related technical jargon or acronym that the worker does not understand. When faced with limited English vocabulary, the worker may feel unable to fully explain their exposures and related symptoms that they thought were related to a recent spray event. In turn, the inspector may misinterpret a worker's silence as complacency and proceed with the rest of the visit without asking further questions about the spray event. In doing so, not only does the inspector miss critical information about an exposure event—but many of the other workers (who may be aware of the reportable incident) notice very little follow up after the inspection. They may begin to feel like WPS inspections are not of value.

Remember, farms may be inspected by multiple government entities.

It's highly likely you won't be the first inspector on this farm. Multi-agency oversight means regulations from the Department of Labor, Food Safety and Inspection Services, OSHA, and state agencies, including tribal organizations, often intersect. While these inspections aim to protect workers, consumers, and the environment—previous inspections may or may not have prioritized cultural sensitivity. If the agricultural establishment is inspected by multiple entities, they may be “used to the inspection process” or be open to having workers interviewed without further explanation. It is important to emphasize open communication and cultural sensitivity from the start.

Taking the time to build trust leads to a safe and inclusive work environment where everyone feels empowered to express their concerns and perspectives. This fosters better understanding, cooperation, and ultimately, a safer workplace for all.

Below are some tips on building trust when setting up your WPS inspection.

A. Nurture a relationship with the agricultural employer.

Initial greeting. Take the time to introduce yourself and explain the purpose of your visit, and that worker interviews will be a component of the visit. As we discussed, farms are inspected by multiple government entities, and you want to clarify your reason for being there by describing the WPS procedure. In comparison to other inspections, focus groups with farmworkers have found that they view WPS inspections as a useful investment in their time, as it demonstrates a government investment in their health and wellbeing. You may communicate this to the agricultural employer.

See Glossary D for a list of common greetings used in several languages. You may want to practice some of these initial greetings on your own.

Order of Inspection. Most WPS inspectors report meeting with the employer or other authorized individual first, and interviewing workers in the second portion of the inspection. Prior to the initial meeting, the inspector will present a Notice of Inspection, to clearly communicate the inspection type, reason for the inspection (if applicable), and the scope of the inspection. During an initial meeting, the inspector should clearly communicate the details of the inspection with the employer or authorized individual. This initial meeting focuses on initial pesticide safety information and pesticide education or training records. This is also the time to set the scene for conducting interviews in the second portion of the inspection. Explain to the employer (or authorized personnel):

- The importance of interviewing the workers and handler(s);
- How many workers and handler(s) should be interviewed;
- How long individual interviews will last.

This gives the employer some time to understand how interviews are a key component of the inspection. This is particularly important for inspectors responding to reported complaints, as the owner will be surprised or caught off guard if a WPS inspector arrives and begins immediately talking to workers without first confirming with an authority.

By following this order, the employer may coordinate with supervisors (or field managers), handlers, or workers to ensure that the desired number of interviews occur. Some states require agricultural employers to compensate workers or handlers for time spent during inspection interviews. For this reason, it is important to check your state's standards. This requirement may not apply to interviews conducted away from the work site.

Set the tone for interactions with workers and handlers. If the inspector can build rapport with the employer, it sets the tone for ease when approaching the workers and handlers. In focus groups with WPS inspectors, agricultural handlers, and workers, many stated that if the agricultural employer (or supervisor) “looked distraught or angry” during the inspection—that it was more difficult to conduct interviews. Focus groups of both WPS inspectors and farmworkers revealed that many cultures have deep respect for hierarchical structures. This translates to a strong emphasis on respecting farm supervisors as figures of authority due to their experience, knowledge, and responsibility for leading operations. So, if the employer/owner looks agitated, the workers and handlers will likely take notice. They may even approach the interview with a dismissive, uncooperative, or aloof attitude.

During the initial meeting with the agricultural employer, the inspector may also become more familiar with some of the WPS processes (such as training frequency, central location) and can use this site-specific knowledge in the worker interviews.

In many states, WPS inspectors use pre-formatted interview questions to ask the employer before interviewing workers and handlers. Below are some points to address within the conversation to prepare for interviewing workers and handlers.

- **Health and safety management.** The inspector may inquire if there is a health and safety manager or compliance manager for the agricultural establishment, who may be prepared to assist during the inspection. Due to the nature of their role, this individual may be well-acquainted with the nature of worker and handler interviews for inspections.
- **Size of the operation.** This will help you identify how many workers to interview.
- **Time of year and impact on farmwork.** If workers are busy, the employer may have some insight on the best time to break for an interview. There may be workers in the field that are not as busy as others, because their tasks are not as time dependent. Compensation for time taken to complete a regulatory interview will depend on state labor laws. When workers are getting paid by “piece rate” with no compensation during the interview, the worker may not want to stop to talk to the inspector unless this is a state-based law.
- **English knowledge and proficiency.** The agricultural employer will likely know the worker’s preferred language and level of understanding. The employer may provide some insight on cultural norms or beliefs that may impact your ability to interview.
- **Health and safety practices.** Check with the agricultural employer if there are any safety practices that you need to know about. Some forms of PPE may be required for biosecurity measures or food safety. A good example may be shoe coverings, nitrile gloves, or hair nets.
- **Interview location.** Ask the agricultural employer if there is an ideal location to interview workers that may be more private. WPS inspection guidance encourages inspectors to conduct interviews with workers and handlers that are at some distance from the employer or supervisor to minimize their potential influence on the process. Although the employer may provide some insight, be careful not to let their perspective lead you to a break room, conference room, or some off-field, enclosed location that makes it difficult to point to important items discussed in the WPS interview. Some interviews may just have to occur directly in the field.

Other tips for employer interaction:

- Bring WPS materials, such as the *How to Comply Manual* or the *WPS Checklist for Employers*¹ so that you may use the materials during the initial greeting. Bring extra copies to leave with the employer if they would like to have them.
- Adhere to any safety protocols for visitors to the agricultural establishment.
- Focus your discussions on regulatory compliance while keeping a positive and constructive tone. Instead of focusing solely on problems or violations, emphasize solutions or educational materials.
- Emphasize the benefits for all involved. When an agricultural employer treats their workers well and provides a safe workplace, it creates a win-win relationship. Workers are more likely to commit to production, and a safer environment is also economically advantageous for the farm owner. Overall, this will reduce employee turnover.

¹U.S. Environmental Protection Agency (EPA) & Pesticide Educational Resources Collaborative (PERC). (2016). *How to Comply with the 2015 Revised Worker*



Protection Standard for Agricultural Pesticides: What Owners and Employers Need To Know [WPS – How to Comply Manual]. <https://www.epa.gov/pesticide-worker-safety/pesticide-worker-protection-standard-how-comply-manual>

Case Study 3

Sarah Whittaker is a tribal representative who performs WPS inspections in Arizona. She arrived at a local tribal farm for a routine inspection. Another inspector told her that in previous years, the farm had a complaint from a tribal worker that the supervisor was forcing workers to go into the fields before the restricted entry interval (REI) time period was over. She learned that the owner was quite angry about the complaint and that there could have been passive retaliation on the worker who filed the complaint. There was little proof of the retaliation occurring, but the other inspector told her that he “had a hunch” that someone was not promoted because of the inspection findings.

When Sarah arrived, she noticed the agricultural employer’s body language was not positive and that he was not pleased that she was there. She thought that this could have been due to the previous inspection. Sarah approached him with honesty and respect. She took the time to introduce herself, explaining the purpose of her visit and the inspection, as well as some of the benefits of compliance. She handed the employer the How to Comply Manual and the WPS Checklist for Employers¹.

As the initial meeting progressed, the employer became slightly more responsive to her questions, after he realized Sarah’s transparency. He told her that he understood the nature of worker interviews. Although he still looked disgruntled, he allowed several workers to be interviewed for the inspection on paid hourly time. He also provided some valuable insight to potential language barriers that she would encounter with different groups of workers. Sarah thanked him for his time and confidently headed out to conduct worker interviews.



Discussion Question:

What are some things that you can do to make an agricultural employer more comfortable during a WPS inspection?

Notes:

A large rectangular area with rounded corners, outlined in light green, containing 20 horizontal lines for writing notes.

B. Nurture a relationship with agricultural employees – workers and handlers.

Acknowledge the immediate impact of language differences on trust.

Most agricultural workers in the United States are foreign born (68%), with more than 65% from Mexico and Central America (NAWS, 2021-2022). The most common primary language reported by farmworkers was Spanish. However, primary languages vary depending on region and location. For example, although farmworkers in California and Florida speak primarily Spanish and English, WPS inspectors in California may be more likely to encounter farmworkers speaking Mandarin or other Chinese languages, whereas WPS inspectors in Florida may be more likely to encounter workers speaking Haitian Creole. In Minnesota, WPS inspectors may encounter workers speaking Hmong. In fact, ~7% of farmworkers reported speaking a primary language other than English or Spanish (NAWS, 2021-2022).

Data about languages used by farmworkers is based on national and regional surveys, but these are simply estimates. It is best to become more familiar with the languages used in your specific state or region.

Below is a breakdown of some of the top languages that WPS inspectors may encounter while engaging with workers and handlers during WPS inspections. These data are from the National Agricultural Workers Survey (NAWS) in 2021-2022. The NAWS is an ongoing survey by the U.S. Department of Labor (DOL) that collects data on demographics, employment, and health of hired crop workers, and the most recent data is accessible on the DOL website.

- English (as primary), 27%
- Spanish, 57%
- Bilingual English/Spanish, 8%
- Indigenous Languages (Mixtec, Nahuatl, Zapotec, others) 2%
- Other, 17% (This includes, but is not limited to):
 - Portuguese
 - Haitian Creole
 - French
 - Tagalog
 - Arabic
 - Mandarin

Data on 'other' is from the 2019 NAWS report. The more current report does not present data on the percentage of farmworkers speaking these other languages.

Language and distrust. When we can't understand someone, communication breaks down and is often replaced by suspicion. Misinterpreted phrases can make it difficult to see past uncertainty and mistrust. In some areas of the United States, it can be challenging to hire and retain multilingual inspectors. Even if the inspector is multilingual (such as English/Spanish), they may still face additional language challenges in the field due to the diverse landscape of agricultural workers. Language barriers are likely to persist.

To build trust with workers and handlers, it helps to clarify and acknowledge these language challenges right away, during the initial greeting. Inspectors should be open-minded when faced with new challenges and prepared with several communication tools ready.

Recognize the importance of building trust with diverse communities.

Building trust with diverse communities is crucial for effective collaboration and addressing their needs. This requires more than just good intentions; it demands active effort and commitment to overcoming historical injustices and systemic biases. This can take time.

Many individuals and organizations have successfully built trust with minority communities through genuine engagement and educational efforts. Sometimes the first step is to be able to recognize, as the inspector, your own internal biases. Remember that you are also working for an organization, which may have its own historical biases. In the field, these can be difficult to interpret.

Here are some useful tips, taken from the article, *Building Trust with Communities of Color* (Chavez-Dueñas and Adames, 2015) and the book *Uncomfortable Neighbors* (Tiffany, 2010):

- **Acknowledge or become familiar with historical context.** Recognize the history of exploitation and discrimination faced by many minority communities, and how this shapes their resiliency and interactions with outsiders. In addition, many minority communities have made substantial cultural contributions to society over time.
- **Be an active listener.** Practice attentive listening without interruption, seeking to understand other perspectives and experiences. Active listening tends to get better the more you practice it. One of the best ways to set the tone for being an active listener in the greeting is to immediately address the worker or handler's preferred language instead of assumption. This shows that you are willing to listen and/or communicate in a way that makes them feel comfortable.
- **Never single someone out because of their ethnicity.** Most cultures expect equal, not "special" treatment. Avoid labeled statements, even if positive, such as "*That Mexican applicator really knew his stuff. . . .*" or "*These Cambodians show up to work on time. . . .*" Learn to identify stereotypes and avoid their use. Almost nothing can be said about *all* Mexicans, *all* West Africans, or *all* Cambodians.
- **Be authentic.** Approach with humility, acknowledging your own limitations and biases. Focus on genuine connections with individuals, not just communities.

- **Respect differences.** Be mindful of diverse cultural values and norms when communicating and collaborating. Avoid using stereotypes in your discussions.
- **Prioritize participation.** When working with others, remember to engage them in some decision-making to give them ownership of the process or situation. A good example of this would be to let the worker decide when to take a break from their work to interview.
- **Be transparent and accountable.** Be transparent about your intentions and actions and hold yourself accountable for fulfilling promises. If you tell a worker that you will “interview them in 5 minutes” then be sure to follow up with them in that time period.
- **Keep developing cultural sensitivity.** Invest in resources and education to broaden your own understanding of different cultures and build your skills in cross-cultural communication and collaboration. Once you clarify what language the worker or handler uses, a proper greeting in the native language can go a long way.
- **Be a patient partner.** Building trust takes time and consistent effort. Plan additional time for inspections so that you and the workers don’t feel rushed. Don’t get discouraged if you have one interview that doesn’t go well. View it as a learning opportunity.

Remember that workers and handlers have feelings and perceptions about why you are there.

Imagine walking onto a farm. Behind the fields and machinery, there are people – workers and handlers with their own career aspirations, anxieties, and perspectives. As a WPS inspector conducting interviews, you will have to navigate apprehensive environments. There is fear of failing interviews, fear of immigration inquiries, fear of breaking the law, and fear of reprisal from employers. These concerns will shape a worker's experience of your visit. While the EPA's robust anti-retaliation provision offers a safety net (40 CFR 170.315), this guide will also explore the reality of passive retaliation.

What is “active listening”?

Active listening is being attentive, responding, and remembering what is being said during the interview. Examples may include (but are not limited to): keeping friendly eye contact, nodding, avoiding interrupting, paraphrasing (repeating what you heard back to the speaker), and note taking.

Table 1: Common stressors experienced by workers and handlers during inspection processes.

| Stressor | Perception |
|--------------------------|---|
| Intimidation | <i>"Will I fail this interview with this government authority?"</i> |
| Immigration Status | <i>"Are they interested in knowing my citizenship status?"</i> |
| Other Inspections | <i>"Where is this inspector coming from? What are they inspecting?"</i> |
| Job/Employment Stability | <i>"If I perform badly during this interview—will I lose my job?"</i> |
| Retaliation | <i>"Will the supervisor or employer punish me for my responses?"</i> |
| English Competency | <i>"If I don't speak English, will I perform poorly?"</i> |

The truth about passive retaliation and how it impacts the WPS anti-retaliation provision.

While meeting with workers, inspectors often remind them of the EPA's long-standing provision against retaliation for enforcement activities (40 CFR 170.315). For example, individual workers are encouraged to report suspected violations, express concerns, and honestly answer interview questions without fear of retribution from their employer. Inspectors can find more information in Chapter 7 of the WPS How to Comply Manual.

The retaliation policy applies to all WPS inspections and is meant to protect from:

- Being fired or blacklisted from the operation or similar establishments
- Discrimination or denial of promotion
- Intimidation, harassment, or threats

As an inspector, it is your role to collect evidence of violations. It may be difficult to collect evidence of retaliation, especially since it can take more passive (unmeasurable) forms. These passive forms of retaliation are illegal but can be difficult to prove in a court of law. So, some workers may not trust the basic foundational principles of the retaliation policy as you explain it to them.

Forms of passive retaliation. It helps to become familiar with some more passive forms of retaliation that exist. Some examples of passive retaliation on an agricultural production establishment may include:

- Assigning a worker an unpredictable schedule or an unaccustomed early/night shift
- Assigning a worker difficult work during hotter periods of the day

- Making a worker perform a new and unpleasant task (such as working with thorny plants, or repetitive reaching overhead)
- Assigning isolating tasks that involve minimal interaction with the rest of the workers
- Micromanagement or excessive criticism of the worker's performance
- Reduction in hours, particularly if the worker is paid for tasks or is only part-time
- H-2A workers not being invited back to participate the following year

Please note that these are just some examples, and the specific forms of passive retaliation can vary. It's important to document any occurrences that raise suspicion. If a worker or handler is indicating an alleged retaliation, the inspector should make observations, take statements, and collect evidence.

In your follow-up meeting with the agricultural employer, you may be able to prevent passive retaliation.

In focus groups with agricultural handlers and workers, many stated that they felt that they did not know the outcome of the WPS inspection or what happened following their interview. This can lead to a great deal of anxiety after the inspection and serious concerns about passive retaliation, which can come at a much later date. Workers may feel like they don't know what actions should be taken because of the inspection.

In your final meeting with the agricultural employer, after reviewing the key findings, you should remind the employer of the retaliation provision (40 CFR 170.315). You may encourage the employer to:

- Share the results from the WPS inspection report with the workers and handlers. Remind the employer of the approximate time frame (days – weeks) to prepare the report.
- Following the report, communicate potential action plans to address any issues that arose from the inspection with the workers and handlers.
- Encourage workers and handlers to ask questions about the inspection process, especially if they saw interviews occur but did not participate.

The importance of a proper introduction.

When approaching a worker or handler, be polite and pleasant. One of the first things you will do is immediately address the worker or handler's preferred language while admitting your own level of language understanding. When appropriate, you may mention that the inspection does not concern the worker's personal work performance or background. Although you know regulatory compliance is the primary objective of the inspection, it's important to keep a relaxed and friendly demeanor. Below are some examples.



When describing the interview process to a worker or handler:

- Focus on the importance of all workers or handlers “understanding” compliance regulations rather than focusing solely on rule enforcement (the individual “breaking the rules”).
- Stay away from behaviors that may appear aggressive, authoritative, or assertive. Remember, in some cultures—your perceived “normal” actions may be perceived differently if you are unprepared. Examples of such behaviors may be waving your professional badge when approaching someone the first time, interrupting the worker during a task or conversation with another worker, or assuming a dominating position (such as sitting at the head of the table while the worker sits at the far opposite end or standing while the worker is seated).
- Avoid using formal language or technical jargon without explanation. If formal language or technical jargon is necessary (such as acronyms, regulatory statutes), save it for the actual interview and do not use it when first describing the interview process.
- Explain the interview as an opportunity to assess the agricultural establishment’s efforts to protect workers, rather than a pass/fail test of the individual worker or handler.



Discussion Questions:

What do you do when you approach a worker or handler to put them at ease? How do you describe the interview process to them?

A proper introduction and greeting will help diminish anxiety experienced about a government authority being on site. Below, we have provided some tips on how to engage with a worker or handler during an introduction.

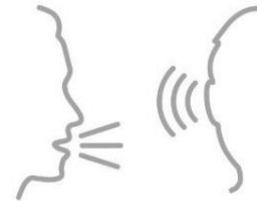
Although some example verbal scripts have been provided, you may consider practicing this script in another language, writing your own script, or even having it printed in the worker and handler’s primary language if you need additional assistance. Although practice scripts are good for beginning interviews, over time you will find a balance with being relaxed and approachable. With experience, individuals will naturally transition to a more relaxed tone, without seeming like they are reading or memorizing something, fostering a more genuine interaction.

Be respectful and professional during the introduction.

If an employer hasn't already introduced you, wait for a natural break in the worker's activity (finishing a harvest run or loading a box) to approach them for an interview. Even if you are comfortable talking to workers and handlers, minimize jokes and avoid potentially culturally insensitive humor. Stay away from jokes perpetuating or emphasizing negative stereotypes. Even if workers or handlers seem to be laughing with you—they may not understand the joke or could feel harmed after your departure. Aim for straightforward communication. Inspectors should not share too much personal information, feelings, or political views.

Speak with lower volume and a relaxed tone.

This may be easier said than done—especially for new inspectors who are excited to be out in the field. Many cultures will hear anger where it doesn't exist if voices are too high pitched and loud.



Become familiar with the cultural norms and greetings in the relevant community.

Be prepared to physically approach the workers and handlers. Know how to wave hello, nod, and if handshakes are accepted or valued. For example, you might extend a light handshake, say a general greeting (such as “buenos días”/good morning), and state your name. Even if you use a greeting in a planned language, it is important to immediately ask the worker or handler what language is preferred. At that point, even if you do not speak the worker or handler's native language, you may learn at least one greeting phrase to initially make them feel more comfortable. See Glossary D for a list of common greetings used in several languages. You may want to use a language app and/or practice some of these initial greetings on your own.

Introduce yourself, your organization, the purpose of your visit, and be up front about the length of the interview.

Workers and handlers have stated that they feel more comfortable if they know the primary purpose of the visit is to confirm that they are provided the information and tools to ensure their personal safety. This also will help distinguish the purpose of your visit from any previous inspectors, if relevant. Ask permission to perform the interview, and don't give orders. It is important for the worker to know the approximate time that the interview will take (e.g., 10 minutes) so they can plan accordingly. You may inform them that their employer has approved the interview.

Try to correctly pronounce the worker or handler's name, even if you must repeat it a few times.

Use their name, even if difficult to pronounce, a few times during the greeting. Don't feel guilty if you mispronounce names, as you are doing your best!

See Glossary A to learn more about Gestures and Body Language Differences in other countries and cultures.

Introduction Script

Use a script like the one below to practice your introduction.

“Hi there! Buenos dias! How are you doing? My name is [Your Name] and I work for the state agricultural department. I'm here today to talk about the things you use to protect the plants on this farm-- like pesticides. Do you prefer English (Inglès) or Spanish (Español)?” [Wait for response.]

Our state has rules to help keep you safe when you work with these products. We call these rules the Worker Protection Standard, or WPS for short. [At this point, you may show a visual]. I just want to make sure your operation is looking out for you, so you don't get sick or hurt. Have you heard of the WPS before?

Don't worry if you haven't, I can explain everything. I'm here to make sure you and your coworkers are safe and healthy. That's my top priority. I'm interested in knowing if you have ever received pesticide safety training, or have been given protective clothing, and you're informed of pesticide application practices.

This visit will require talking to workers and handlers. This talk should only take about 5 to 10 minutes. Would you be willing to talk a little bit?”

If a language challenge exists, have a clear plan for acknowledging the language differences and how, as an inspector, you will address them.

During a greeting statement, it is important to address language differences immediately (often in the second or third sentence). This will help put the workers and handlers at ease. Workers and handlers provided feedback that right away, language barriers are intimidating because misunderstanding can lead to feeling like they have done something wrong, which can lead to negative experiences. Consider using a worker or handler's native language in the “hello statement” or visual aids to help you during the introduction. On the other hand, you may find that although the worker or handler looks like they speak a different language, they may be fluent in English. In the Glossary at the end of this guide, we have provided some common greeting examples in other languages. If an interpreter is used, acknowledge the interpreter, their background, and describe the interpretation process. See the “Language” section of this guide for more information on how to work with an interpreter.

Title VI under the Civil Rights Act (1964) requires providing language assistance to individuals with limited English proficiency. It is important to become familiar with your own state's requirements regarding the use of interpreters, aids, or other language assistance services.

If you do not speak the worker or handler’s language at all, use visual aids during the introduction.

This also helps clarify to the worker or handler that you have prepared by bringing visual aids designed specifically for them. This conveys that you have done this during other inspections, with the community, and that you are well prepared. This will also alleviate stress associated with both language barriers and illiteracy.

See the “visual aids” section of this guide for more information on their suggested use.

Use of Visual Aids Script

Use a script like the one below to practice how you will convey that you have visual aids.

“I don’t speak much Spanish, but I want to assure you that I am here to help. I have some pictures here, along with text, in Spanish, to help explain everything.”



Discussion Questions:

How are you currently approaching and introducing yourself to workers and handlers? Do you approach workers and handlers differently? Why?

Notes – Write a Verbal Script:

Use this space to write some sentences to use in your verbal introduction with workers and handlers. You may write your introduction statement in English, Spanish, a mixture of both languages, or another language. It is common for an introduction to include two languages (the greeting in the worker or handler's native language and the explanation in English).

Practice this before your next inspection.

First impressions are very important, and they involve body language in addition to spoken words. Greeting someone initially in their own language and using some of their own body language customs, will immediately put the person at ease.

- **Know what form of physical greeting is acceptable.** Lighter, loose grip handshakes are often accepted within many farmworker communities. Some cultures may greet one another with a bow, or a hand to the heart. When unsure, it is always best to err on the side of caution and respond to the worker in some way that they do back to you.
- **Be cautious of making direct eye contact for long time periods.** Although in the U.S., eye contact can be valued (seen as “paying attention”), in other cultures it can be intimidating. It is best to use only shortened eye contact, with “smiling eyes.” It helps to smile.
- **Greet and acknowledge other handlers, workers, or individuals nearby.** Greeting people, even if you are not interviewing them, is a matter of respect. Some workers may have their children or other family members with them. Quick greetings can be made with a smile or nod to these other individuals.

Several of the greetings in Glossary D are short and may be applicable to quickly acknowledging other workers.



Photo: University of California Regents

Case Study 4

It is a sunny afternoon in a California vineyard. Javier has been a seasoned pesticide handler for more than 15 years. Most of his workplace interactions to date have been all in Spanish. Although he understands some limited English, he is not fluent in conversation. He is an experienced handler with a wealth of knowledge. He has never gone through a WPS inspection before but has heard about the inspections from other handlers.

Mark is a young and enthusiastic state agricultural inspector conducting a WPS inspection. He has only been working at the state office for a year. He speaks some Spanish, but it is limited. Mark wants to improve his Spanish in the field. He is eager to conduct more interviews, and so he approaches Javier as he is still refilling a sprayer while wearing some personal protective equipment.

Mark uses his limited Spanish to make a sly, funny comment about Javier's protective equipment and tells him that he is a government inspector. Javier doesn't understand much but during Mark's introduction, he recognizes the word "pesticidas" and nods nervously. He continues with his task. Mark then pulls out the WPS pamphlet in English about all the WPS regulations, holds it out near Javier's face, and asks him (in Spanish) how long he has been working at the establishment.

Javier thinks this is strange, since he has been at the establishment for quite some time and it seems like this young inspector from the government wants to know his full immigration history. He tells Mark, in English, "15 years". Mark immediately tells Javier about the rules for compliance and starts asking some questions about whether Javier "follows these rules."

Although tremendously experienced, Javier is now feeling overwhelmed. He has received basic pesticide safety education and instructions on how to do these tasks multiple times, but he has never seen the manual in English. He thinks it is strange that Mark is conversing with him in Spanish while showing him an English text document and putting it in front of his face while he is completing his work. Confusion and fear build on his face— and he is relieved that he has chemical goggles on to shield his reaction.

Mark observes some resistance in Javier to talk to him, so he informs him that he is concerned that this farm is not following all the safety measures and that it could lead to problems, such as fines.

Javier is now starting to panic, as the fear of fines leads to additional worries about closure or losing a job that he has had for more than a decade. He looks around for someone to help him get out of the interview process.



Discussion Questions:

Although experienced and working for a long time, why do you think Javier felt threatened during this exchange?

What are some things Mark could have done to approach this interview differently?

Physical Appearance

Proper dress and attire. Your physical appearance and authority can be a delicate matter when it comes to performing on-farm inspections. It is true that official uniforms or logoed clothing can help establish your legitimacy, but these items can also create an authoritative barrier to interacting with workers and handlers. When interviewed during focus groups, most WPS inspectors described different state requirements for professional dress and had a variety of strategies in the field. The first step is to research farm culture and become familiar with the type of dress on the farm that you will be visiting (see “Know before you go” section of this guide). Don’t aim for exact “matching” of the worker and handler clothes, but respectfully organize your outfit choice to help you fit in.

Conveying authority. It is important to establish your credentialed role as an inspector. Check your state’s protocols around uniform and credential presentation. Recognize that some of these displays of authority (e.g., like lanyards, government IDs, and government vehicles) may seem threatening and intimidating to some workers and handlers. If wearing a lanyard or government identification, be mindful of the frequency or the intensity of which it is displayed. You will present this identification, along with the notice of inspection, with the agricultural employer (especially if it is required protocol). After the initial meeting, show the identification after being introduced or when prompted. If driving a government vehicle with a large emblem or logo visible on the vehicle, consider parking the vehicle in a more appropriate location for your initial meeting with the farm owner, like near the initial meeting area (e.g., an office or barn). Drive your government vehicle into the fields only after introductions are made or when prompted.

Here are some additional tips on physical appearance:

- **Focus on “farm function” instead of fashion.** Like the workers, you will want to choose comfortable, weather-appropriate clothing. Some states require closed-toed shoes and long pants instead of shorts.
- **Maintain professionalism.** Items like polo shirts and button-down shirts are appropriate because they are not overly casual and will not be viewed as

disrespectful. By maintaining professionalism, you are recognizing the physically demanding nature of the work and the often-harsh weather conditions that workers and handlers may be working in. Research the community that you are interviewing to learn if they will be intimidated by official or government-related logos or emblems on your work wear.

- **Research cultural sensitivity.** Certain clothing, like shorts with short length, might have specific meanings or connotations in other cultures. Some cultures may value head coverings. In such situations, you may not need to purchase the exact same head covering, but you may be more likely to consider wearing a hat.
- **Lead by example by wearing appropriate clothing and personal protective equipment (PPE).** PPE may include very basic clothing items such as long sleeves or pants, sunglasses, and sun hat. Many vegetable farms may require additional PPE, such as boot or shoe covers, for food safety purposes.

Table 2: Two different examples of common farm dress and attire.

| <p>Location: California Vineyard <i>Season: Summer</i></p> | <p>Location: Michigan Blueberry Farm <i>Season: Spring</i></p> |
|--|--|
| <p>Workers and handlers are likely wearing required work clothes made of lightweight, loose-fitting clothing made from breathable fabrics like cotton. Long sleeves, socks, and pants are preferred to protect against things like sunburn and insect bites. Hats and sun protection are taken seriously against the harsh sun.</p> | <p>Workers and handlers are likely wearing a base layer cotton shirt with a thicker fleece, cotton, or wool sweater for warmth and insulation. Insulated bib overalls, coveralls, or cargo pants may be worn. These workers are likely wearing lined waterproof work boots and thick socks. Beanie hats are quite common.</p> |
| <p>Inspectors may consider wearing work or cargo pants, covered tennis shoes, with a lightweight long sleeve button down shirt and sun hat.</p> | <p>Inspectors may consider wearing insulated jeans, a base layer polo shirt with a zip up sweater, and work boots.</p> |



Photo: University of California Regents

Case Study 5

Lila Chen is a seasoned WPS inspector in the state of California. Today, she is performing a WPS inspection at a multi-fruit farm where a complaint has been filed about potential misuse. She knows that gaining the trust of the Vietnamese farmworkers will be essential during her WPS inspection. Lila has lived in California all her life, since her grandparents immigrated to the U.S. from China. Before her visit, she studies some Vietnamese customs. Another co-worker tells her that most of the Vietnamese workers will likely be wearing wide-brim hats on the farm. Since it will be a sunny day, she packs her own sun hat for the trip. She learns about initial greetings with a bow and a smile. Lila diligently practices the Vietnamese phrase "Chào mừng! Tôi là Linh" (Hello! I am Lila). Her attempts, though slightly U.S. accented, are decent.

The initial meeting with the farm owner goes easier than expected, as Lila learns that most of the pesticide safety issues were caused by a misguided translation issue. The owner is supportive of her efforts to go into the field for worker interviews. When she first enters the field, she can tell that the workers are apprehensive about the visit, and it is likely they have already been informed of her presence. Approaching a group of workers, she attempts the bowing gesture, and the practiced phrase. She then informs the group of workers about her own limitations in speaking Vietnamese. One of the workers smiles and the initial tension visibly eases. The worker, although Vietnamese, tells Linh that she understands English very well and appreciated the greeting. She tells Lila that she will be fine to do the interview. They bond when they learn that they both like pho, a traditional Vietnamese soup that Lila has had on multiple occasions. The interview goes well. Once done, the worker helps Lila identify another group of workers to talk to. Many of them are partially fluent in English.



Discussion Questions:

What things did Lila do to make sure the workers felt like she was approachable?

What other prior preparation could she have done before arriving on the farm for the inspection?

Notes:

Lined area for writing notes.

V. Phase 3 Interviews

Translation and Interpretation

A. What is a language challenge (language barrier)?

Translation and interpretation are both tools or services that can be used by WPS inspectors to overcome language challenges encountered during inspections.



Translation and Interpretation

Remember: *Translation* deals mostly with written text, taking time for accuracy and polish. It is a static process. An example of a translation service would be to use your cell phone to translate 1-2 phrases or words during an interview.

Interpretation handles spoken language on-the-spot, prioritizing timing and understanding over perfection. Interpretation often requires a deeper cultural understanding to bridge idioms and context, such as the use of “Spanglish” or humoral medicine terms.

A language challenge is more than just misunderstood words. It is, at its core, a difficulty in communication between two individuals. Overall, the difficulty in navigating different languages on the farm is the most common issue brought up by both inspectors and farmworkers during the Building Bridges focus groups held for the development of this guide. This is because workers may avoid interaction for fear of making mistakes (due to language) or appearing “unintelligent” in another language. Advanced pressure to “understand the inspector” can be a major source of anxiety for workers and handlers.

For some immigrant communities, the ability to understand English is viewed as a marker of authority or social advancement. In fact, English fluency can become a wedge in immigrant families, pitting

children as interpreters and potentially undermining parental authority and traditional family dynamics. On a farm, if workers and handlers observe only inspectors and supervisors speaking English, it can feel disempowering. Many documented safety incidents have involved inadequate understanding of safety procedures and protocols due to language barriers. Some of these incidents may have not been intentional—rather they may be caused due to miscommunication and misunderstanding.

To improve WPS interview quality, as well as contribute to overall employee satisfaction, it is important to acknowledge and address language barriers head on.

Some key aspects of language challenges during WPS inspections include:

1. **Stages of language acquisition:** When speaking to a worker or handler, unless you are a linguistic expert—it is difficult to know or predict what “phase” of English language understanding someone is in. As previously stated, this should be done in the initial greeting. On the contrary, if you are in phases of your own Spanish learning, it helps to know what phase you are in. This way, you may be better prepared to communicate during the interviews, where you stand with regards to your basic Spanish knowledge. (This may apply to languages other than just Spanish).
2. **Limited vocabulary:** Some workers may appear to understand basic greetings, numbers, or commands but when you further engage in more vocabulary during the interview, you may notice that they are not grasping complex instructions, definitions, or safety procedures.
3. **Comprehension:** Some workers may appear to understand basic greetings, numbers, commands, and even advanced vocabulary. However, they may not pick up some of the more advanced technical terms.
4. **Passive understanding:** It is highly likely that a great number of workers will understand spoken English but will not want to speak it themselves. This can limit their ability to respond to interview questions. They may stick to only responding “si” or “no” even if the question is more detailed. Never, ever speak poorly of someone if they are nearby because you assume they cannot understand.
5. **Power dynamics:** Language proficiency can be seen as a marker of power or authority. For example, if the workers observe the inspector conversing with the establishment owner in English (and they don’t understand), they may recognize the presence of a regulatory official but will not know their reason for being there.

As a WPS inspector, you can address language challenges directly by:

Planning. See the “Know before you go” section on preparing for the languages that you may encounter during a WPS inspection. Never make assumptions about the language spoken. In the greeting statement, you will learn the worker or handler’s preferred language right away.

Making language understanding easier. You may be bilingual already or consider learning an additional language. If this is not possible, skilled professionals (such as translators and interpreters) can help ensure accurate communication and bridge the gap between languages and cultures.

Adapting your communication style. When speaking with a worker or handler with limited English proficiency, you may talk slower, use simple language, and avoid too much technical jargon. As a listener, you may pay more attention to non-verbal cues, respond emphatically, and know when to ask for help or use translated materials and visual aids.

Creating a safe and inclusive environment. You should be honest about your language acquisition and communicate potential barriers openly. You can encourage

workers to ask questions, clarify doubts, and express concerns in whatever way they feel comfortable—even if it means making gestures and pointing at things.

Exact Cognates in English and Spanish

Exact cognates are the same word with the same spelling. There are some exact cognates in English and Spanish. It may be useful to write down some of the ‘exact cognates’ that you encounter during WPS inspections. Even if you are not fluent in Spanish, since they are like English, you may be able to use and apply them during interviews. Remember, although they are spelled the same, you will want to become familiar with the differences in pronunciation (in Spanish / English).

- Agenda / Agenda
- Natural / Natural
- Alcohol / Alcohol
- Animal / Animal
- Banana / Banana
- Idea / Idea
- Formal / Formal
- Legal / Legal

Near Cognates in English and Spanish

Near cognates are words that share similar meanings and a hidden Latin root, but with a twist of pronunciation or spelling. There are many near cognates in English and Spanish. It may be useful to write down the ‘near cognates’ that you encounter during WPS inspections, as you may be able to use and apply them during interviews (in Spanish / English).

- Pesticida / Pesticide
- Banano (Guatemala) / Banana
- Precio / Price
- Hierba / Herb
- Insecticida / Insecticide
- Herbicida / Herbicide
- Insecto/Insect
- Overol/Coverall
- Tomato/Tomate

B. Stages of learning a second language.

Below are the five major stages of second language acquisition. It is important to consider both of the following:

Where workers and handlers are within this framework and how you may adjust your communication style as needed. For example, if you notice that a worker is using only single words in English with some hesitation, you might suspect they are in an “Early Production” phase and should consider also utilizing some Spanish or visual aids during the interview to make them feel comfortable.

Where you (the inspector) are within this framework if you are learning or applying a second language. For example, if you are in the “Speech Emergence” phase, you may be able to greet workers using some Spanish sentences in your greeting. You might inform them that you are still learning and will still need visual aids and graphics throughout most of the interview process. They are likely to be encouraged by your initial greeting and appreciate your brief use of their native language. You might even consider learning a sentence, just as “Mi español no es muy bueno todavía” (“My Spanish is not very good yet”). You may even add “pero me gustaría hablar contigo” (but I'd like to talk to you) or “pero estoy mejorando” (“but I'm getting better”). Many focus groups of WPS inspectors stated it was beneficial to explain your level of Spanish knowledge at the greeting/start phase of the interview.

5 Stages of Second Language Acquisition

Below, we describe the 5 stages of second language acquisition and how this may be demonstrated in the field when interviewing workers and handlers.

Stage 1: Hasn't begun language acquisition

- **Description:** The worker or handler may understand some English based on cultural influence but is not currently interested in necessarily learning the language. They may respond with gestures or point to photos in English conversation, but their body language makes it appear that they are confused.
- **Example:** A worker or handler at this stage might understand some basic English greeting or instruction, but they are likely to be hesitant to participate in any interview if conducted in English. Using Spanish as an example, a WPS inspector at this stage may be able to say “Buenos Dias” in Spanish, but then they have no other knowledge and will have to rely on navigating the interview with an interpreter or rely on translated visual aids. It is highly preferred that bilingual staff help complete the interview or interpretation services are used if a worker or handler is in Stage 1.

Remember: Never use a stereotype or speak negatively about someone. If someone cannot speak English, they still may be able to comprehend much of what is said in English due to globalization and cultural influences of the U.S. Speaking negatively about someone may not be a direct statement. For example, an inspector may express their frustration with a worker not understanding English outwardly. In many cases, the worker or handler may understand what is being said, but this would negatively impact their self-assessment for language competency.

Stage 2: Pre-production (silent period)

- **Description:** The worker or handler may understand some basic English instructions but still speak very little or not at all. They may respond with gestures or point to photos in English conversation. Their brain is actively beginning to process the sounds and grammar of English, even though they are not speaking it yet.
- **Example:** A non-English speaking worker or handler at this stage might understand simple phrases like “please” and “thank you”, and may be able to show you something if prompted with a visual. A WPS inspector at this stage may be able to greet the worker in Spanish, but then navigate the interview with an interpreter or the use of communication or visual aids. It is still preferred that bilingual staff help complete the interview or interpretation services are used if a worker or handler is in Stage 1.
- **Remember:** Always assume that if someone cannot speak English well, they still may be able to comprehend much of what you are saying. Remember to use visual aids.

Stage 3: Early production (some words)

- **Description:** The worker or handler may be able to use some single words like “yes”, “no”, “water,” “break”, “pesticides”, etc. They may be able to string together simple phrases like “After I use the bathroom” or “Read sign here”. They may want to speak slowly. They also may be more hesitant at this stage.
- **Example:** A worker or handler at this stage might understand how to say “Yes/No” when asked basic questions slowly, along with visual aids. They may be able to show you something if prompted with slow, clear English and the visual. A WPS inspector at this stage may be able to greet the worker in Spanish, but then navigate the interview with an interpreter or the use of communication or visual aids. The inspector may encourage the worker to use simple Spanish phrases such as “Si/No, pesticidas, or agua” if they feel comfortable translating. It is important to go slow and patiently wait for the worker or handler to speak when they are in Stage 3. If the inspector is conducting a for-cause inspection as part of an investigation, it may still be preferred that bilingual staff help complete the interview or interpretation services are used if detailed chronological details are needed.

Stage 4: Speech emergence (some conversation)

- **Description:** The worker or handler might start using longer sentences with basic grammar structures like “I interview soon, ok?” or “I use PPE here.” They may ask basic questions like “How long?” and “Who are you with?” Their speech may be more fluid and less hesitant, although many grammatical errors are present.
- **Example:** The worker or handler may engage with the inspector if the English is slow and easy to understand. The use of visual aids is still encouraged. During this phase, they may be keener to use short “sí/no” responses and since they are not stringing together full and complex sentences, it may be difficult to get detailed responses. Again, visual aids will assist the inspector if they need to fall back on their primary English. Workers will appreciate the inspector’s knowledge and application. If the inspector is conducting a for-cause inspection as part of an investigation, it may still be preferred that bilingual staff help complete the interview or interpretation services are used if detailed chronological details are needed.
- **Remember:** It is still a good idea to have visual and communication aids ready during this stage. Sometimes, this phase may create more problems since the workers or inspectors may “assume” fluency. In such situations, if the language barrier becomes stressful, the use of the aids can allow the individual to fall back on their native language when needed.

Stage 5: Intermediate fluency (more complex conversation)

- **Description:** During this phase, the worker or handler understands basic English and can engage in some extended conversations about their job, tell stories, and express opinions. They are more aware of grammar and make few mistakes, although complex sentences may still pose some challenges. They may also read basic English texts and understand many acronyms and more complex English jargon used on the farm. This level of understanding, however, will depend on literacy.
- **Example:** A worker or handler at this stage might tell the inspector in English about a spill incident or something that happened on the farm. They may feel more confident describing things in detail, such as where the PPE is stored and how it is cared for.

Stage 6: Fluency (full understanding and writing)

- **Description:** The worker or handler will speak and understand English confidently and fluently. They may approach you, rather than the other way around. They are able to discuss advanced concepts, use humor, and understand complex things about U.S. culture. They can read and write for professional purposes in English.
- **Example:** A Spanish speaking worker or handler at this stage will likely be very comfortable engaging in English with you. They may want to tell stories or share advanced details about their work or family life. It is important to keep the interview brief and respect their time constraints.
- **Remember:** These stages are not rigid. They may be influenced by other factors like age, motivation, and education.

C. Positive perceptions when speaking native languages.

Positive perceptions of inspectors attempting to use local or native languages, like Spanish, were reported by farmworker focus groups. Even if you feel like you “aren’t speaking it correctly”, an attempt shows respect for someone’s culture and identity. It demonstrates that you are trying, and it could set the stage for more positive and productive interviews.




Photo: University of California Regents

“One’s effort to speak another language is a flattering tribute . . .”

-Voltaire

D. Strategy for addressing language challenges

Below is a ranked list of the most preferred (at the top) to the least preferred (at the bottom) ways to address language challenges during WPS inspections. This list was organized based on focus group input from both inspectors and farmworkers. The options on this list may be subjective to state hiring and availability of bilingual staff. Accuracy, trust, and practicality were considered. It is important to note that this list may change with time. As technological advances are made, online translation tools could become so detailed and context aware that they may even one day surpass basic human translation. This may reshape the hierarchy as presented.

| | Option | Pros | Cons |
|---|---|--|--|
| Most Preferred  Least Preferred | Bilingual Inspector | Easy and accurate communication, builds trust, minimizes disruption. | N/A |
| | Bilingual Staff within department | Familiar with context, may require training. | Availability, workload, coverage area |
| | Intermediate fluency Inspector prepared with visual aids | Cultural competency, handles communication gaps. | Accuracy relies on inspector's skills, may confuse workers |
| | English-speaking Inspector prepared with visual aids | Prepared for communication gaps | Accuracy relies on aids, complex questions may be difficult, workers rely on visuals |
| | Telephone Interpretation Service | Advanced fluency, useful for rare languages | Reception issues, limited farm/technical jargon knowledge |
| | Other Worker or Handler Translating | Useful for rare languages, cultural norm for chaperone. | Miscommunication due to time pressure and shortcuts |
| | Supervisor Translation | Useful for rare languages with low worker numbers. | Risk of response bias and manipulation |
| | Google Translate (or other translation app) | Rapidly advancing, translates basic vocabulary. | Requires connectivity or cell phone reception, accuracy and nuance is questionable for complex conversations |
| | English-speaking Inspector unprepared with no visual aids | N/A | Hinders communication, jeopardizes interview quality and compliance |

The importance of bilingual inspectors and staff: Hiring and retention.

Remember that it can be challenging for state and local agencies to hire and retain bilingual staff. Given the diverse linguistic landscape in various regions, a single bilingual inspector or staff may not be able to address *all* language barriers. However, WPS inspections need to continue. Advanced language education and professional bilingual development could be offered to WPS inspectors. Language learning programs may even have a narrowed focus on getting through the interview process (e.g., greeting, interview, cultural sensitivity) in another language— such as “interview practice sessions”.

Tips for speaking through an interpreter.

These tips were adapted from the U.S. Department of Health and Human Services Office of Civil Rights (2017) and the National Center for Cultural Competence at Georgetown University (2023).

See Glossary C for a guide to common “Technical Jargon” terms in WPS interviews, along with some ways to describe this jargon to an interpreter.

Address the individual worker or handler directly. Speak directly to the person you want to communicate with, not the interpreter. Be mindful of making too much direct or intimidating eye contact. The interpreter will not “feel left out” as they are familiar with this interaction.

Speak clearly and slowly. Use simple language, avoid technical jargon, and allow for pauses during interpretation. The use of visual aids may benefit the interpretation process if technical jargon cannot be avoided.

Be patient and attentive. Quality interpretation takes patience. Even though you may not understand the worker or handler, listen attentively. Avoid interrupting the interpreter or the person being interviewed.

Use non-verbal cues: If you did your research before the inspection, you may be familiar with the types of non-verbal cues used by the workers and handlers. Maintain very light eye contact (“friendly eyes”), facial expressions, and body language to enhance communication. For example, you may nod after listening to the interpreter to indicate that you understood.

Clarify and confirm. Avoid using acronyms. Rephrase questions and terms if necessary.

Always thank the interpreter. Show your appreciation for the interpreter’s help. Remember, many interpreters may be from the same community or background of the workers and handlers. This builds rapport.

Impact of dual language slang used on farms.

On many farms in the U.S., workers and handlers may use numerous dual-language slang terms. This is often done to create new and efficient shortcuts so that they can easily perform their work. It is important to become familiar with the slang used in your region to avoid misunderstandings and even insults. Professional settings call for caution when using slang (see “Phase 1: Know before you go”). In the following pages, we provide a glossary of common Spanglish terms encountered during WPS inspections.

Case Study 6

On a sunny morning in New Jersey, John, a WPS inspector arrived at a farm to conduct some routine interviews with farmworkers after his initial meeting with the employer. The initial meeting went well, and upon learning about John’s fluency in Spanish, the employer had informed John that many of the workers “were most comfortable speaking in Spanish.”

John then left the outbuilding and walked up to a group of workers, who were predominantly Hispanic, and approached a member of the crew. Forgetting to confirm the worker’s language preference, John launched into his full Spanish greeting with confidence, assuming the worker’s fluency in the language. The worker, Miguel, understood the Spanish but looked around at the other workers while showing signs of discomfort and hesitation during the interaction. Miguel then interrupted John, while expressing that he was fluent in English-- and although his parents were from Mexico, he was born and raised in the United States. English was his primary language. The other workers chuckled at this. John suddenly realized his oversight and immediately jumped to English conversation. When speaking with Miguel, he learned that over half of the workers on the farm could speak English very well, and even the native Spanish speakers mostly engaged in English.

This encounter highlights the importance of never assuming language proficiency based on appearance or sole input from the employer. Miguel was indeed Hispanic, but he could have spoken a variety of languages (e.g. Spanish, English, or an indigenous language). Since he did not reaffirm the language of choice with the worker (Miguel), John may have inadvertently created a barrier to effective communication during the interview.

VI. Phase 3 Interviews

Visual Aids

A **visual aid** is any non-linguistic tool used to communicate information. Visual aids can include pictures (such as drawings, icons, infographics), gestures, or even physical objects. When navigating a language barrier, visual aids can be incredibly helpful.

If used well, visual aids can be clearer than a lengthy verbal explanation and may conserve time. Individuals who speak English as a second language, or who may be in an early stage of language learning—may also appreciate the break to refocus when listening to a foreign language for an extended time period. Having access to visuals (such as the ability to point to a photo) may build confidence.



While visual aids can overcome some language barriers, they should not be used as a “replacement” for communication. You may still need to have an interpreter present or rely on some Spanish knowledge to fully engage the worker or handler during the interviews. Visual aids, especially presented along with the worker or handler’s native language, can help get through an interview.

Many WPS inspectors in focus groups reported the use of all forms of visual aids during WPS interviews. However, the benefits of using visual aids are tied to having some form of language understanding to accompany their use.



Discussion Questions:

In a previous interview, have you ever used visual aids to help get your message across? What types of visual aids were effective or ineffective?

Below, we describe each type of visual aid and how it may be used during the interview process.

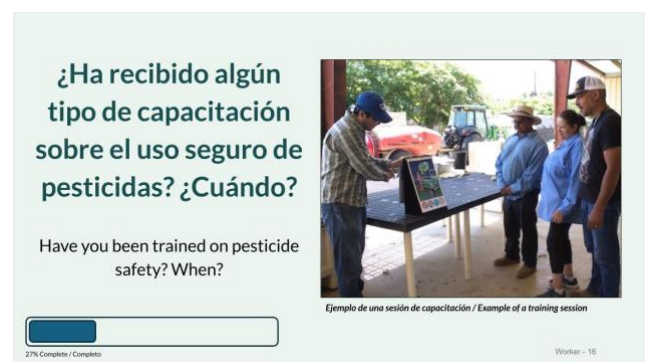
A. Pictures (drawings, icons, infographics)

As the inspector, you may want to save a flip chart or specific images to support the questions that you are asking. Photos or illustrations can represent objects (such as a pesticide label, eye washing station, or a sink), actions (such as decontaminating or cleaning a spill), or concepts. They may depict a location (such as a greenhouse or central location) or administrative controls (such as showing an Application Exclusion Zone) or pesticide application form. If the photo or illustration contains a person, consider if it is culturally relevant to those being interviewed. Ideally, the visual aids you use, whether flip charts or photos, should depict farmworkers with diverse ethnicities and backgrounds that reflect the actual population you're interviewing. If visual aids are used, they make sure they are approved by your state prior to use.

It can be challenging to find or identify representative images for a diverse group of U.S. farmworkers. However, if using a flip chart or selected images, you may feel more prepared if the photos being used show a variety of worker and handler ethnicities and backgrounds. Diversity encompasses a wide range of backgrounds, including individuals of different genders and individuals with disabilities. Check with your communications specialists or diversity and inclusion unit for assistance with culturally relevant images. The images shown should be large enough to be seen clearly by participants—even those with accessibility concerns.

Flipcharts may be in the form of a binder or booklet but consider how these tools may be used on a tablet or personal electronic device. At the time of writing this guide, tablets are preferred over cell phones since they offer better visibility and screen adjustment options.

There is a visual aid flipchart in conjunction with this guide. You may access it by searching the web for the resource title or through this link: <https://bit.ly/3U6DhUL>



Other educational materials from PERC may be used for assistance with visual aids and include (but are not limited to): a) *Protect Yourself and Your Family from Pesticide Exposure: The Worker Protection Standard Agricultural Worker Booklet*; b) *the Worker Protection Standard (WPS) Respiratory Protection Guide* (this is good for discussing or showing respirators); and c) *the PERC WPS Training Flipchart*.

Additional notes on Flipchart use:

In focus groups, many WPS inspectors stated that it can become a burden and/or impractical to carry a large flipchart around in field settings. Weather conditions are also not always conducive to using a flipchart.

You may consider using a more virtual format on a computer or tablet (such as a PDF format). Having access to a virtual option will also allow you to zoom in or explore closer details of a photo if needed. Keep in mind that if you do plan to use a tablet, you will need to plan for charging and low internet connectivity. The glare from strong sunlight can also impact viewing quality and you may need to conduct interviews in a more shaded area. When going this route, many WPS inspectors have stated that it is still good to bring a physical copy backup of the Flipchart (this could be a binder with waterproof laminate) in case these other challenges are prohibiting to completion of the interviews.

More description on options for Flipchart use (as well as Flipchart instructions) are provided with the Flipchart tool in electronic format.

Other Visual aids described and used by WPS inspectors during focus groups:

- Work tasks, individuals applying pesticides, mixing or loading pesticides, cleaning pesticide related equipment, working with crops
- Decontamination areas, wash basins
- Safety Data Sheets (SDS)
- Pesticide Labels – some labels may be in English, but Spanish-translated labels are becoming more available. It may help to point to the label to clarify where safety information, application instructions, and emergency preparedness information is stated. Remember, this may not be as effective with individuals who have low literacy.
- Pesticide Application Records
- Hospital or Health Care Clinic
- Signs and Symptoms of Pesticide Exposure
- Photo of a pesticide-related training or educational event taking place
- Personal Protective Equipment (PPE) varieties and storage
- Restricted Entry Zone sign or signal
- Application Exclusion Zone

B. Gestures

Some gestures allow inspectors to overcome cultural differences, bypassing difficulties in language. One example would be nodding or bowing when greeting someone.

Gestures described and used by WPS inspectors during focus groups:

- Waving or nodding “hello” to a worker or handler as you approach them for the interview
- Waving or nodding “hello” to other workers nearby, even though you are not interviewing them (sign of respect)
- Pointing to specific buildings or areas on the farm when talking about them (example: decontamination area), or the PPE that the worker is wearing. This is likely to be more effective if the interview takes place in the field, and not in a conference or break room area
- Showing appreciation for the worker’s time during the interview, through a handshake or other appropriate form of gratitude

A note about some gestures:

Some gestures are signs of affection and respect. These include giving hugs or kissing on cheeks are quite common and even used in professional settings in some cultures. It is best to refrain from too much physical contact unless you are a friend or well-known acquaintance. Some gestures are signs of disrespect. Steer clear of making a fist, pointing directly at someone (“things” or “items” are ok), crossing your arms in front of your chest, and snapping your fingers. These gestures are viewed as offensive in several cultures. See Glossary A to learn more about Gestures and Body Language Differences in other countries and cultures.

C. Physical Objects (also called “Demo items”)

When other methods (photos, gestures) don’t work, you may consider using or bringing physical objects. The immediate tangibility of the object makes them a very effective visual aid. Since this requires a little additional work, it is best to use physical objects only if you have some portions of an interview that are not going well.

Physical objects described and used by WPS inspectors during focus groups:

- Personal protective equipment, such as a half face respirator or a pair of chemical handling gloves
- The “How to Comply” Manual, WPS Poster, “Protect Yourself from Pesticides”, or the “WPS Checklist for Employers”, you may point to the item that you are talking about during the interview

Case Study 7

The Florida sun beat down on Marie's face as she surveyed rows of sugarcane. In the distance, she observed Christophe, the farm's foreman and trained pesticide applicator, waving at her impatiently. He was standing next to a woman wearing khakis and a button-down sun shirt. Both Marie and Christophe's primary language is Haitian Creole. "Hey Marie! Look out—a government inspector is coming for you!" said Christophe in Creole, with a sly grin. The woman in khakis looked like a visitor to the farm. "Bonjou, Marie," the woman greeted in a familiar Haitian tone, and then told Marie (in broken Creole) that her name was Kristen, and that she was a pesticide safety inspector from the state department. Kristen seemed nice, but her Haitian Creole was not good. Marie appreciated that she was at least trying.

Before Kristen was able to finish her thought, Christophe stood in front of her proudly and said, "I know English better than Marie does, and I can help you do the whole interview." Marie rolled her eyes because although well-intentioned, Christophe could be bossy sometimes. He didn't give Marie a chance to say that she knew English and just couldn't speak it as well as she could understand it. It seemed like Christophe was always talking down to her, and she was annoyed. Perhaps she could just get out of doing this interview. It seemed like there were inspectors visiting the farm all the time for all sorts of issues and this interaction with Christophe wasn't worth her time.

Kristen pulled a tablet out of her bag and showed it to both Christophe and Marie. The tablet was full of pesticide related photos, with some Haitian Creole phrases on each photo. Marie recognized some of the processes in the photos, and she noticed some of the photos even featured sugarcane and Haitian workers who looked like her. Marie glanced at some of the photos and nodded to Kristen about doing an interview. Christophe looked surprised, put his arms a little in the air, and walked away. Marie was relieved—she didn't need Christophe giving her a difficult time later about what English words she knew and didn't know. Together, Kristen and Marie could probably get through at least some of the questions without Christophe's intervening and trying to tell his own stories.

During the interview, Marie was able to appropriately point at her tasks, show the crops that she worked with, and point out the protective gear she was given, gesturing towards the nearby pesticide shed. Kristen's questions on the tablet were clear and concise and the photos were easy to see. Kristen thanked Marie for her cooperation with a warm expression. "Gen yon lòt fwa, Marie," she said, a simple phrase that seemed practiced but genuine. In only a few minutes, Marie was able to go back to her work.



Discussion Questions:

How did Kristen create a safe space for Marie, so she felt like her voice could be heard (even in the presence of a potentially intimidating coworker)?

How did the use of visual aids boost Marie's confidence in participating?

Notes:

VII. Additional Resources

Cultural Sensitivity and Language Resources

Due to rapidly shifting demographics in the U.S. cultural sensitivity should be an ongoing journey of understanding and appreciating diverse backgrounds and perspectives.

[Disclaimer: These resources are listed as examples for informational or self-study purposes only and do not constitute an endorsement by federal agencies.]

Below are some U.S. based resources to help you learn and grow in this journey, particularly focusing on working with immigrants, minorities, or in health and safety:

1. **The Office of Minority Health (OMH):** This organization provides resources on cultural and linguistic competence in healthcare, including educational materials and best practices. They also offer free, accredited online courses on various cultural sensitivity topics.
2. **Think Cultural Health (U.S. Department of Health and Human Services):** Read about standards for culturally and linguistically appropriate services (CLAS) in healthcare. These standards provide a framework for organizations to deliver equitable care to diverse populations, but may be applicable in other fields, such as environmental health and safety.
3. **National Alliance for Hispanic Health (NAHH):** This organization provides resources on cultural competency for Hispanic/Latino communities. Sign up to receive information about free educational programs and webinars.

Below are some Language Learning tools to help you acquire some knowledge of a secondary language and potentially apply it in the field:

1. **PERC Bilingual Dictionary of Terms:** This dictionary, available online and in PDF format, lists most words familiar in WPS interviews, in both English and Spanish.
2. **Peace Corps Language Resources:** The Peace Corps Language Resources offer free learning materials for various languages—and for specific dialects (such as “Cameroon French”).
3. **Translation Apps:** Translation apps are not fully covered in this guide but should be considered. Translation technology is rapidly advancing, and many translation tools have been developed for business and travel purposes. Remember that the use of an app requires connectivity or cell phone reception. Focus groups with other WPS inspectors have revealed that accuracy and nuance is questionable for complex conversations. Many inspectors did report using the translation app if they needed assistance for a specific phrase or vocabulary word.
4. **Language-learning Apps:** These are encouraged, but there may be more focus on basic vocabulary terms and less focus on politeness and cultural context. However, these apps can still be used to:
 - Build a foundation of basic vocabulary and grammar in your target language.
 - Focus on learning key phrases for greetings, introductions, and requesting permission.
 - Use the "Stories" feature to practice reading and listening comprehension (such as someone telling you a story during an interview)

VIII. How to Use this Guide for Programs or Workshops

This guide was written to be used as a tool for self-study in cultural competency. However, it may be used in a variety of settings, such as for Building Bridges (BB) Workshops and incorporated into education programs for WPS inspectors.

Below, we describe some ways to use the guide to facilitate more advanced educational opportunities.

A. Time allocation and setting

We suggest dedicating 4 to 6 hours, with at least one break, for a comprehensive workshop covering the aspects of this guide. The education program or workshop may be developed based on specific topics covered in this guide. Below is an example agenda for a 6-hour program:

| Topic | Time Allotted |
|---|-------------------|
| Welcome/Introductions | 20 minutes |
| Local Guest Speaker(s) | 30 minutes |
| Cultural Sensitivity and Building Trust (feature Guest Speaker) | 60 minutes |
| Break | 15 minutes |
| Things to “Know before you go” with Activity | 40 minutes |
| Language Skills and Interpretation | 40 minutes |
| Basic Language Skills Acquisition | 45 minutes |
| Break | 15 minutes |
| Practice Scenarios – Practice Greeting or Interview | 40 minutes |
| End – Other Resources, Wrap Up, Evaluation Activity | 10 minutes |
| TOTAL | 5.25 hours |

It is important to consider how much time will be spent on each topic. For example, if workshop leaders would like to focus on language skill acquisition (such as learning how to perform the interview “greeting” in another language), then more time will need to be allocated to that section. If visual aids are provided to WPS inspectors in the training, then they would need time to practice or role play using the visual aids, so they feel comfortable with use and timing during worker and handler interviews.

B. Make the program specific to your region

Although you may utilize the guide’s general principles, you may want to highlight only specific language examples or change case studies that are more relevant to your state or region. You may create a case study of your own by researching local crops, farming practices, and cultural nuances. This will help personalize the learning experience and make it more relatable to participants.

Consider inviting guest speakers from local agricultural communities or outreach organizations to share inside perspectives. These individuals’ first-hand experiences may enrich the learning experience and provide valuable insight or motivation.

C. Decide if you need to include basic language education

This may also be specific to your region. For example, perhaps you are training individuals already well-versed in both English and Spanish, but they would like to learn some Haitian Creole. Consider including some basic greeting phrases in relevant languages and encourage participants to learn basic conversation skills to break down barriers and build trust. The time allocated to language skills acquisition will depend on the need. You may consider reviewing some translation apps or tools for the inspectors to use.

Other tips for a successful Building Bridges (BB) educational program:

- Include interactive role-playing activities or simulated interviews to practice cultural sensitivity skills.
- Promote open discussions, stories, and personal experiences.

Provide participants with access to resources (such as visual aids), recommended reading materials, or ways to stay connected and motivated after the training.

Remember to offer other ways to continue improving!

Building cultural sensitivity and overcoming language challenges can be a long, ongoing journey. Some of your workshop participants will expect immediate success or change, such as learning to conduct a full interview in Spanish overnight. It is important to stress that this guide, along with the workshop, is only a starting point. Most of the participant’s learning will likely come from direct interactions and experiences in the field.

IX. Glossary

Glossary A: Body Language Differences

| Region/ Country | Smiling | Eye Contact | Nodding | Raised Eyebrows | Laughing |
|--------------------|--|---|---|--|--|
| North America | Happiness, friendliness, agreement. | Sign of attentiveness, confidence, and honesty. Agreement or understanding. Some individuals may avoid prolonged eye contact due to feelings of status. | Agreement or understanding. | Surprise or curiosity. | Pure joy and amusement. |
| Europe | Similar to North America, although some countries might smile less than what you're used to in America – Especially some Nordic countries and Russia, where smiling is limited with strangers. | Generally interpreted as attentiveness and honesty. Uncommon in Russia. | Agreement or acknowledgment. | Surprise, disbelief, or confusion. | Joy, but might laugh less often and with less intensity than Americans. |
| Asia (China) | Smiles can indicate politeness, respect, or discomfort. | Not prolonged eye contact. | Nodding can mean acknowledgment more than agreement, and the famous head wobble can have many different meanings. | Surprise, curiosity, or scepticism. | Laughter is used more conservatively. Public displays of loud laughter can be seen as impolite or inappropriate. |
| Asia (India) | Smiles can indicate politeness, respect. Smiles are usually reserved only for close family members, community members, and acquaintances/ | | Nodding can mean acknowledgment more than agreement, and the famous head wobble can have many different meanings. | Quick eyebrow raise is playful, but prolonged conveys surprise, disbelief, or confusion. | |
| Latin America | Warmth, friendliness, and hospitality. | Generally comfortable and friendly, not prolonged. Workers may look away if they are younger or not of dominant nature. | Agreement or understanding. | Warmth, surprise, curiosity, emphasis. | May be louder and more animated, sharing amusement, but also politeness and gratitude. |
| Africa | Warmth and hospitality. | Varies across cultures, can show respect or humility. | | | Joy and amusement. |
| Middle East | Reserved for close relationships, less common with strangers. | Varies across cultures, can show respect or challenge. | Often slower and more deliberate, indicating agreement. | Emphasis and questioning. | Joy and amusement, although more controlled and less frequent in public settings. |

[Disclaimer: This table was adapted from Zucchet, E. *Body language in different cultures around the world: A top guide*. Berlitz. Retrieved from <https://www.berlitz.com/blog/body-language-different-cultures> This resource is for informational or self-study purposes only and does not constitute an endorsement by federal agencies.]

Glossary B: Guide to Common Spanglish Terms on Farms

This glossary describes some, but not all, Spanglish terms you may hear on farms. Spanglish is a hybrid language that combines elements of both Spanish and English. Spanglish emerges naturally when bilingual individuals incorporate words and phrases from both languages into their conversations, creating a fusion of the two languages. In the 1930s, Spanglish was more commonly called Espanglish or Inglañol.

Even if you don't speak Spanish, it helps to know a few Spanglish terms and expressions used on farms to avoid misunderstandings.

| Spanglish | English | Spanish |
|-------------|---------------|-------------------------|
| Biles | Bills | Recibos |
| Chatear | To chat | Hablar / platicar |
| Chegador | Checker | Inspector, verificador |
| Chequear | To check | Revisar |
| Diler | Dealer | Concesionario |
| Esprayar | To spray | Rociar |
| Fil o filde | Fields | Campo-campos |
| Googlear | Google search | Busqueda en Google |
| Lonche | Lunch | Comida / almuerzo |
| Mixiar | To mix | Mezclar |
| Parkear | To park | Estacionar |
| Postear | To post | Publicar |
| Puchar | To push | Empujar |
| Raite | To ride | Llevar, aventar, viajar |
| Traila | Trailer | Remolque |
| Troca | Truck | Camioneta |
| Wachear | To watch | Mirar |

Glossary C: Technical Jargon – WPS Interviews

The Worker Protection Standard (WPS) and training materials have some technical safety terms. Some individuals, such as outside interpreters, may be unfamiliar with this “technical jargon”. Here are some terms you might encounter and their explanations. We have provided some ideas for explaining these terms to an interpreter.

| Technical Jargon | Definition | Explanation (for interpreter) |
|---------------------------------------|--|--|
| Application Exclusion Zone (AEZ) | A nearby area surrounding the pesticide application area and the pesticide application equipment. Considered to be the area surrounding the point(s) of pesticide discharge from the application equipment that must generally be free of all persons during pesticide applications. Employers may not direct or allow workers to enter an AEZ on an agricultural establishment. | Imagine a "keep out" area around where pesticides are being applied. If the pesticide applicator is putting on pesticides, they must stop if anyone accidentally enters this area. Think of it like a temporary fence you can't cross until it's safe again. Your supervisor or employer should tell you to keep out of this area. |
| Central Location | This is a place on the agricultural establishment where pesticide safety information, pesticide application information, and hazard information (Safety Data Sheets, called SDSs) are kept and made accessible to worker and handler employees. | This is like the "safety corner" on the farm where everyone can find important information about the pesticides used. It should also tell you where the nearest medical center, like a hospital is located in case you need to rush there for treatment. |
| Decontamination/ Decontamination Site | Describes the process or the location where someone would remove pesticides from their skin, clothing, or safety equipment by washing or rinsing. This location should have emergency decontamination and general cleaning supplies. | This is where you wash off any pesticide that might be on your skin, clothes, or gear. Think of it like a washing station, where soap and water must be accessible at all times. |
| Exposure | When pesticides or pesticide residues come into contact with people. | This means when a pesticide contacts a person (human). |
| Hand Labor | Any agricultural activity that a worker performs using their hands or with hand tools that causes them to have substantial contact with plants, plant parts, or soil or other surfaces that may contain pesticide residues. Hand labor does not include operating, moving, or repairing irrigation or watering equipment or performing crop advisor tasks. | This refers to any farm work done with your hands or with hand tools, like picking vegetables, where you might touch plants or soil that could have pesticide residue. |

| Technical Jargon | Definition | Explanation (for interpreter) |
|-------------------------------------|---|--|
| Inhalation, or Inhalation Exposure | This refers to the act of breathing in an airborne pesticide (such as one in the form of vapors, particles, or aerosols). It can result from breathing air that is contaminated with particulate matter (e.g., dust), vapors (e.g., volatile or semi volatile contaminants), or aerosols. | This means bringing pesticides into the body by breathing them in. |
| Long-term health problem | A pesticide-related illness or disease which may extend over months, years, or a lifetime. | This means an illness you could get from pesticides that might not show up right away but could affect you for a long time. |
| Ocular | Pertaining to the eye. This is one of the routes of entry of pesticides into the body. | This just means your eyes. Pesticides can get into your body through your eyes too. |
| Oral | Pertaining to the mouth. This is one of the routes of entry of pesticides into the body. You may also hear this called “ingestion exposure route”. | This just means your mouth. Don't put anything in your mouth that could have pesticides on it! |
| Dermal, or Dermal Exposure | This refers to the skin or how pesticides may contact and be absorbed through the skin. | This means coming into contact with pesticides through your skin (like touching). |
| Outdoor production | Production of an agricultural plant in an outside area that is not enclosed or covered in any way that would obstruct the natural airflow. | This means growing crops outside, not in a closed area like a greenhouse, hoop house, or polyhouse. <i>[Workers in these situations will know these examples.]</i> |
| Personal Protective Equipment (PPE) | Devices and apparel worn to protect the body from contact with pesticides or pesticide residues. PPE could be coveralls, chemical resistant suits, chemical resistant aprons, chemical resistant gloves, chemical resistant footwear, chemical resistant headgear, and protective eyewear. | This refers to any protective equipment, like gloves, masks, or safety glasses that you wear on your body. |
| Restricted-Entry Interval (REI) | This is the minimum time required after a pesticide application in which workers are not allowed by the employer to enter the treated area unless they have the proper Personal Protective Equipment (PPE). The length of the REI will depend on the type of pesticide and what is written on the label. It is the employer’s responsibility to notify workers when there is an REI on the establishment. | This is the "wait time" after spraying before you can go back into the area without special protection. Think of it like a countdown timer for safety. |

| Technical Jargon | Definition | Explanation (for interpreter) |
|-----------------------------------|---|--|
| Restricted-use pesticide (RUP) | A highly hazardous pesticide that can only be purchased, possessed, or used by a person who is a certified applicator or under the supervision of a certified applicator. | These are pesticides that can cause a lot of harm to people and the environment if they are not used in the right way. Only specially trained people should be using and working with these types of pesticides. These pesticides are not available for purchase or use by the general public. |
| Route of exposure | The way a pesticide gets onto or into the body. The four routes of exposure are dermal (on or through the skin), ocular (on or in the eyes), respiratory (into the lungs), and oral (through swallowing). | This is the way pesticides get into your body, such as through your skin, eyes, lungs, or mouth. |
| Runoff | The liquid spray material that drips from the foliage of treated plants or from other treated surfaces. Also, the rainwater or irrigation water that leaves an area. This water does not soak into the ground, but flows to a different location. | This describes pesticides that washes off plants or the ground and gets into water. It's important to manage this carefully to protect the environment. |
| Safety Data Sheet (SDS): | A document that provides critical information about a pesticide, such as its hazards, health effects, safety precautions, handling and storage procedures, emergency measures, and clean up. | This is like a "user manual" for each pesticide, telling you everything you need to know about its safety and how to handle it properly. Remember to also read the Pesticide Label, as it has been approved and has much more detailed information. |
| Sensitization | An allergic reaction to pesticides, typically on the skin. | This means you could have an allergic reaction to a pesticide, like a rash or trouble breathing. |
| Respirator Fit Test | This is a type of test performed by a trained or qualified person to make sure that a respirator properly fits the wearer's face. | This makes sure your mask fits perfectly so no pesticides can sneak in when you breathe. |
| Emergency Medical Treatment (EMT) | The employer must promptly provide transportation to a medical facility capable of providing emergency medical treatment to a worker or handler who has been exposed to pesticides. The medical facility must be equipped to handle acute pesticide poisoning. Employers must provide the Safety Data Sheet (SDS) (which should contain the product name, EPA registration number, and active ingredients), and describe circumstances of how the pesticide was used and how the exposure occurred. | If someone gets sick from pesticides, the employer (or supervisor) must be prepared to take them quickly to a hospital or other medical treatment facility that knows how to treat pesticide exposures. The supervisor (or employer) should also be prepared to give the hospital information about the pesticide, like its name and what it was being used for. |

Glossary D: Common Greetings in Other Languages

In focus groups, farmworkers noted that if a WPS inspector tries to at least greet them in their native language, even if imperfectly, it can have a positive impact on them. This is because the native greeting shows respect and recognition, demonstrates sensitivity, and shows the inspector tried to foster understanding.

A little effort goes a long way and even a small attempt to speak the worker or handler's language can create a positive impact to build bridges. If you try, workers and handlers may also be motivated to apply some of their limited English in the interview. Be careful not to oversell your language capability and be prepared to inform the worker or handler that you are still learning the language.

Below are some common greetings used among farmworkers in other languages:

English phonetic spelling is in italics.

Spanish:

- Buenos días/tardes/noches: *Boo-eh-nos dee-ahs/tar-des/noh-ches*: Good morning/afternoon/evening (universal greeting)
- Hola: *Oh-lah*: Hello (informal)
- ¿Cómo estás/está usted?: *Koh-moh eh-stahs/eh-stah us-ted?*: How are you? (informal/formal)
- ¿Qué tal?: *Keh tahhl?*: How's it going? (informal)

Portuguese:

- Bom dia/tarde/noite: *Bohm jee-ah/ Bo-ah tahr-jee/ Bo-ah noy-chee*: Good morning/afternoon/evening (universal greeting)
- Olá: *Oh-lah*: Hello (informal)
- Tudo bem?: *Too-doo bem?*: All good? (informal)
- Como vai/vai o senhor/a senhora?: *Koh-moh vahy oh sen-yor/ah sen-yor-ah?*: How are you? (informal/formal)

Haitian Creole: (Note: Creole has different dialects, so it is importance to practice what dialect is used in your state or region.)

- Bonjour: *Bon-zhoo*: Hello (universal greeting)
- Ki jan ou ye?: *Kee zhan oo yeh?*: How are you? (informal)
- Sa a: *Sa ah*: Hi (very informal)
- Mesi anpil: *Meh-see ahn-peel*: Thank you very much (show appreciation after greeting)

French: (Note: French pronunciation can vary by region, and the phonetics are approximations based on standard French pronunciation. It is important to practice what pronunciation is used in your state or region)

- Bonjour: *Bohn-zhoor*: Hello (universal greeting)
- Comment allez-vous?: *Koh-mahn tah-lay-voo?*: How are you? (formal)
- Salut: *Sa-lyu* (approximately "sa-loo"): Hi (informal)
- Ça va?: *Sa vah?*: How's it going? (informal)

Tagalog:

- Magandang araw/hapon/gabi: *Ma-gan-dang ah-raw/ ma-gan-dang ha-pon/ ma-gan-dang ga-bi*: Good morning/afternoon/evening (universal greeting)
- Kumusta?: *Koo-mus-ta?*: How are you? (informal)
- Naku, kumusta na po?: *Na-koo, koo-mus-ta nah poh?*: Oh, how are you already? (formal, shows respect)
- Mabuhay!: *Ma-boo-hay!*: Welcome! (show positive and welcoming vibes)

Arabic:

- Sabah al-khair/masa' al-khair/masa' al-khair: *Sa-bah al-khayr/ ma-sa' al-khayr*: Good morning/good afternoon or evening (universal greeting)
- Marhaba: *Mar-ha-ba*: Hello (informal)
- Ahlan wa sahan: *Ah-lan wa sahan*: Welcome (formal)
- Kayf haluk?: *Kayf ha-luk?*: How are you? (formal)

Mandarin: (Note: Phonetic pronunciation is not listed here since Mandarin is more complex due to changing tones. Instead, it is recommended to listen to audio examples and practice the forms of Mandarin used in your state or region).

- Nǐ hǎo (你好): Hello (universal greeting)
- Nǐ hǎo ma? (你好吗): How are you? (informal)
- Nín hǎo ma? (您好吗): How are you? (formal)
- Jīntiān zuì jiāo hǎo ma? (今天过得好吗): Are you having a good day today? (casual)