



**Alternative Language Policy  
Discussion  
&  
New Educational Resources  
for Low Literacy Participants**

Produce Safety Educator's  
Call #58  
January 31, 2022



# Instructions

- All participants are muted.
- There will be time for questions and discussion at the end of the meeting.
- Feel free to use the chat box to ask questions as well!
- This session will be recorded and the presentation will be shared via the listserv and on our website after the call.



# Topics for Today

- Alternative Language Delivery Policy
- ‘More than Words’ produce safety illustrations
- Subpart E Proposed Rule



# Why a new policy on how PSA trainings are delivered?

- It became clear our current policy was limiting grower participation
- Current policy: “All participants must receive training in a language they understand”
  - Includes: 1) having a PSA manual written in the same language they understand and 2) manual is in the same language in which the course is delivered
- PSA Grower Training courses have been limited to languages in which a translation exists
  - Currently in English, Spanish, Chinese, Portuguese
  - Translations are expensive and not practical for all languages



# Delivery of the PSA Grower Training Course in Alternative Languages

- Addresses language and literacy barriers to make training available to a wider audience
- Will allow for trainings to be conducted in the language (verbal and written) that is best for participants
- Likely increases planning and organizational effort for trainers in order to deliver high quality training
  - Fortunate to have dedicated trainers pilot this policy and evaluate it with us



# Delivery of the PSA Grower Training Course in Alternative Languages

## Policy Amendment for Same-Language Policy

Version 1: January 2022

### Background

The original Produce Safety Alliance (PSA) “Same-Language Policy” governing delivery of the PSA Grower Training Course limits course delivery to languages in which a translation exists. The Same-Language Policy as it appears on the PSA Grower Training Course Registration Form states:

*The PSA Grower Training Course Manual is currently available in English, Spanish, Chinese, and Portuguese. All participants must receive training in a language that they understand. This includes having a PSA Grower Training Manual that is written in the same language that participants easily understand and is in the same language in which the course is delivered.*

The PSA has identified situations under which the current Same-Language Policy and available **Approved PSA Manuals** (see definitions box) and corresponding presentation slide sets will not meet the needs of all potential course participants because some ‘supervisors or responsible parties’ at farms covered by the Produce Safety Rule do not speak or read one of the languages in which the PSA curriculum is currently available. A policy amendment is described below to guide

### Definitions

#### **Delivery Language:**

The language which is used for verbal delivery of the curriculum materials.

#### **Written Language:**

The language of the written, PSA-approved translation of the Approved PSA Manual and PowerPoint slides.

#### **Alternative Language:**

The language of delivery in the scenario.

#### **Approved PSA Manual:**

A training manual that has been developed using the PSA policy for translations and approved by PSA for

<https://producesafetyalliance.cornell.edu/curriculum/delivery-psa-grower-training-course-alternative-languages/>



# Details of the Policy

- Option 1: Bilingual participants prefer an Approved PSA Manual in an Alternative Language
  - One or more participants want an Approved PSA Manual in a different language then the training is delivered
- Option 2: All participants and trainers are bilingual and prefer an Alternative Language for delivery and discussion
  - All participants can read an Approved PSA Manual (APM) language, but prefer delivery in a different language that does not have an APM
- Option 3: Participants are unable to understand the Delivery Language and/or any Written Language of the Approved PSA Manuals
  - One or more participants have limited literacy and/or need interpretation to attend the training

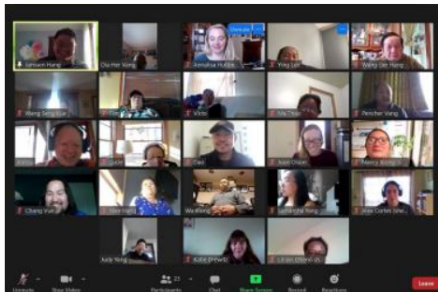


# Piloting the Policy

- Piloted the policy with 4 courses
  - Hmong, Ukrainian participants
- Evaluated participants and trainers

## Pilot Hmong-language bi-lingual PSA grower training in Minnesota

by Annalisa Hultberg, Extension Educator, University of Minnesota



The Produce Safety Alliance (PSA), University of Minnesota Extension, Minnesota Department of Agriculture Produce Safety Program, and the Hmong American Farmers Association (HAFA) recently collaborated to offer the nation's first alternate language training that met the regulatory requirement of § 112.22(c) for covered farms.

The goal of this pilot course was to test a draft policy developed by the PSA to expand trainings in languages that the PSA does not currently offer or have a matching translated manual. This is important because the 'supervisors or responsible parties' at many farms subject to the Produce Safety Rule may neither speak nor read a language in which the PSA course is currently available (i.e., English, Spanish and Chinese). The pilot allowed for the development and evaluation of best practices so the draft PSA policy could be refined and eventually finalized in order to offer PSA Grower Training Courses to these audiences in languages that they understand.





# Registering a course with this new policy

<https://producesafetyalliance.cornell.edu/register-grower-training-course/>

[Home](#) / Register Grower Training Course

## PSA Grower Training Course Registration

**PSA Grower Training Courses must be registered at least 2 weeks in advance of the training date to ensure proper paper work can be completed. AFDO reviews course registrations within 5-7 days of receiving this form.**

Please see the [PSA Grower Training Set Up Guide](#) for more information on conducting in-person PSA Grower Training Courses.

Please see the [Temporary PSA Grower Training Course Policy](#) for more information on remote delivery options during COVID 19 Outbreak.

### Important update:

If you had a previously registered in-person PSA Grower Training Course and plan to deliver it remotely, please cancel the course by contacting AFDO ([afdo@afdo.org](mailto:afdo@afdo.org)). Use the registration below to request a new course.

## Registration Form

### Course Delivery Options

In response to COVID-19 and the recommendations to develop social distancing strategies, the PSA has decided to temporarily amend its current policy for PSA Grower Training delivery and allow remote delivery as an option up until December 31, 2022.

#### Please select a course delivery option \*

- I am requesting a traditional in-person training. No remote delivery needed.
- I would like to register a new course for remote delivery.



# Registering a course with this new policy

<https://producesafetyalliance.cornell.edu/register-grower-training-course/>

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**What is the primary language of your course participants and the language the course will be conducted? \***

AFDO

- Chinese
- English
- Portuguese
- Spanish
- Other Language in Consultation with the PSA



# Request for input

- Although this policy has been piloted and finalized, we welcome additional comments
- Important that our policies are focused on the best outcomes for training participants so if policies are interrupting this process, please let us know
- This updated policy is an example of feedback making us change a policy to be more effective
- Questions or comments? Contact Donna Clements ([dmp274@cornell.edu](mailto:dmp274@cornell.edu))



# More Than Words – Produce Safety Illustrations

- Highlight difficult produce safety topics
  - National educator’s survey and ad hoc committee helped prioritize topics
- Worked with illustrator, Anni Matsick
- Topics include:
  - Worker training
  - Cleaning and sanitation
  - Postharvest practices
- Ten illustrations in Year 1
  - Will be posted on website very soon



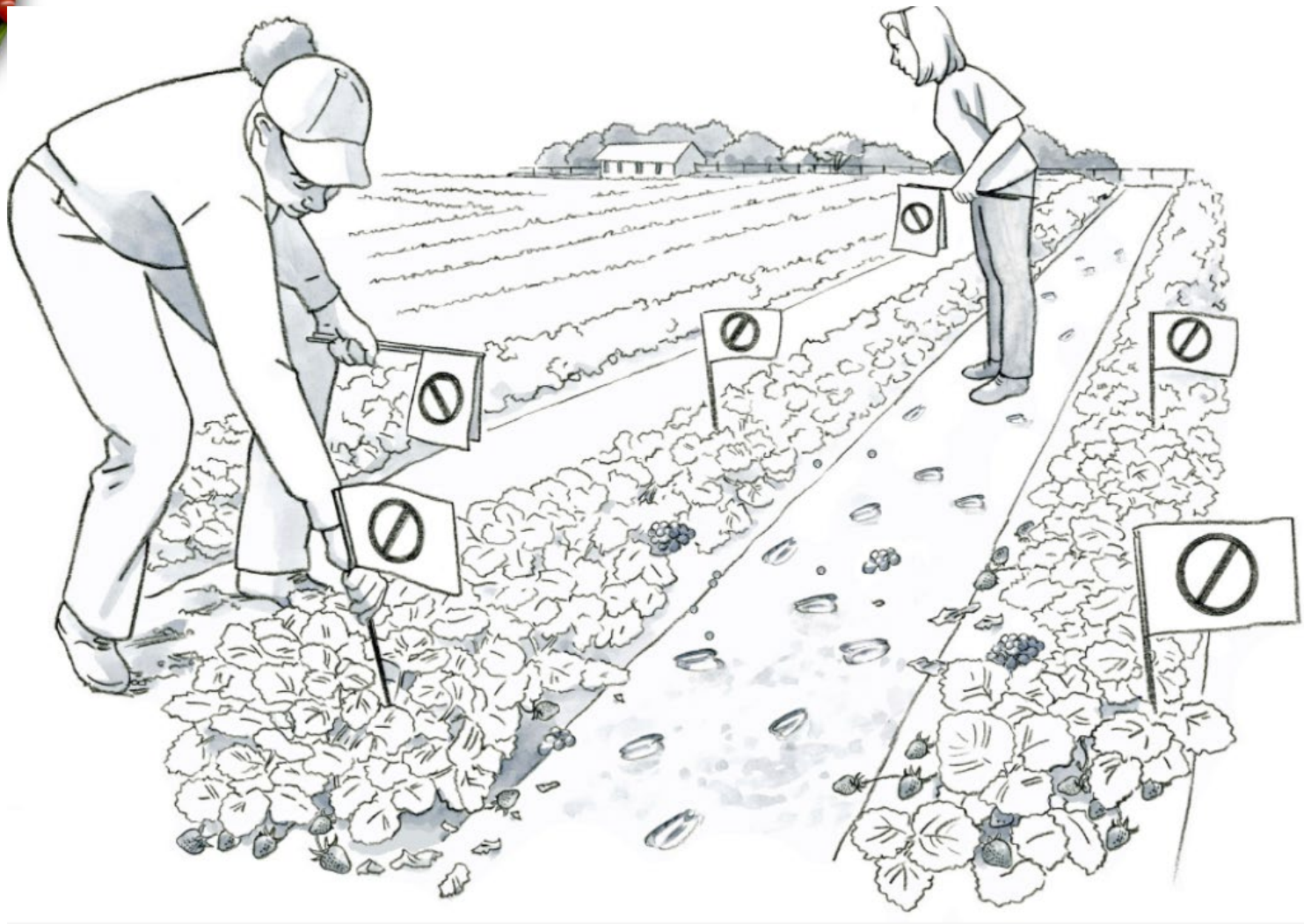
# Why Illustrations?

- Illustrations effectively communicate concepts without the use of text
- Intended to supplement the PSA Grower Training Course
- Help attendees visualize food safety concepts
- May be useful for low-literacy growers, or those who speak languages where there is no translation of the PSA GT manual



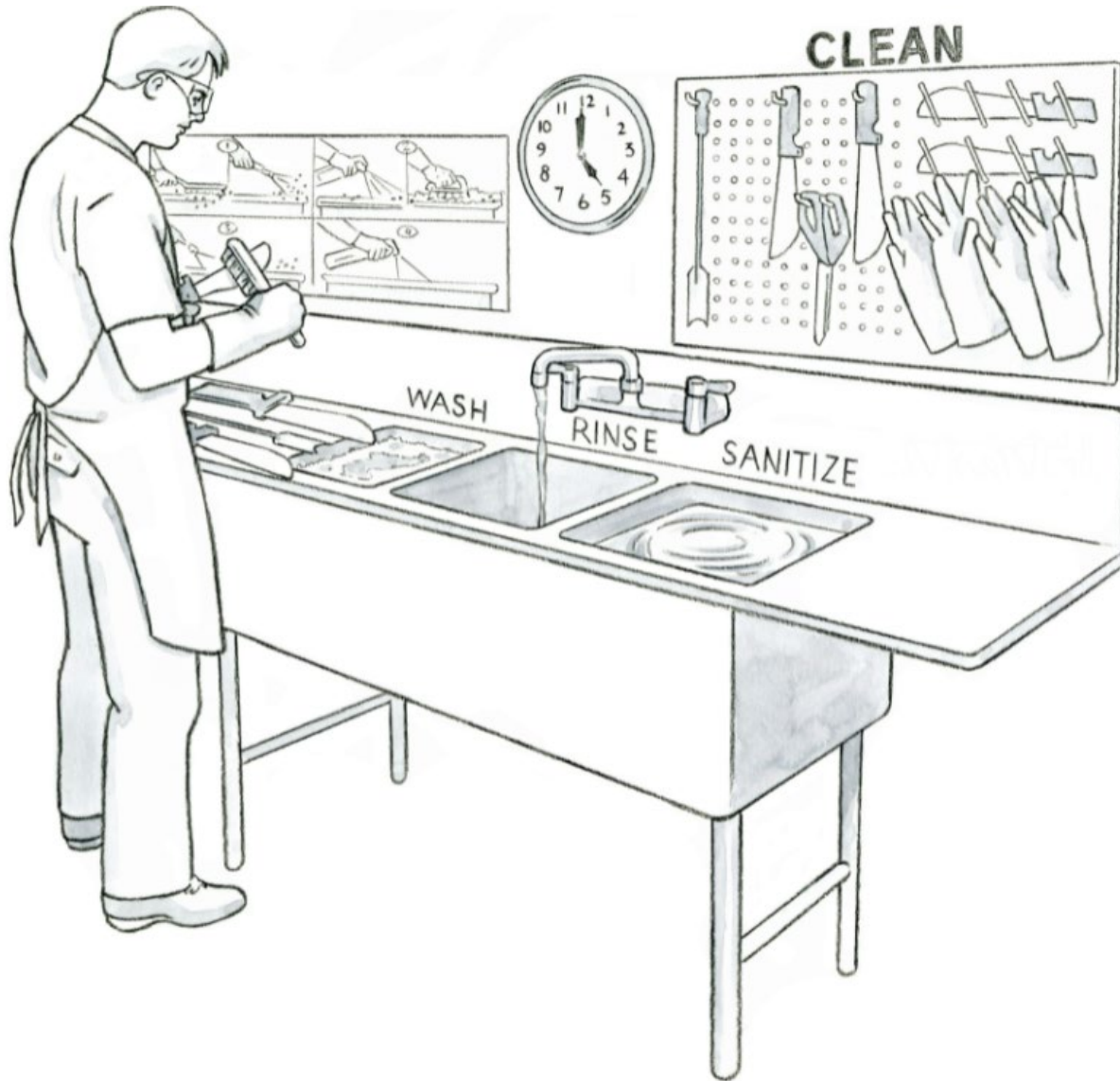
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ALLIANCE

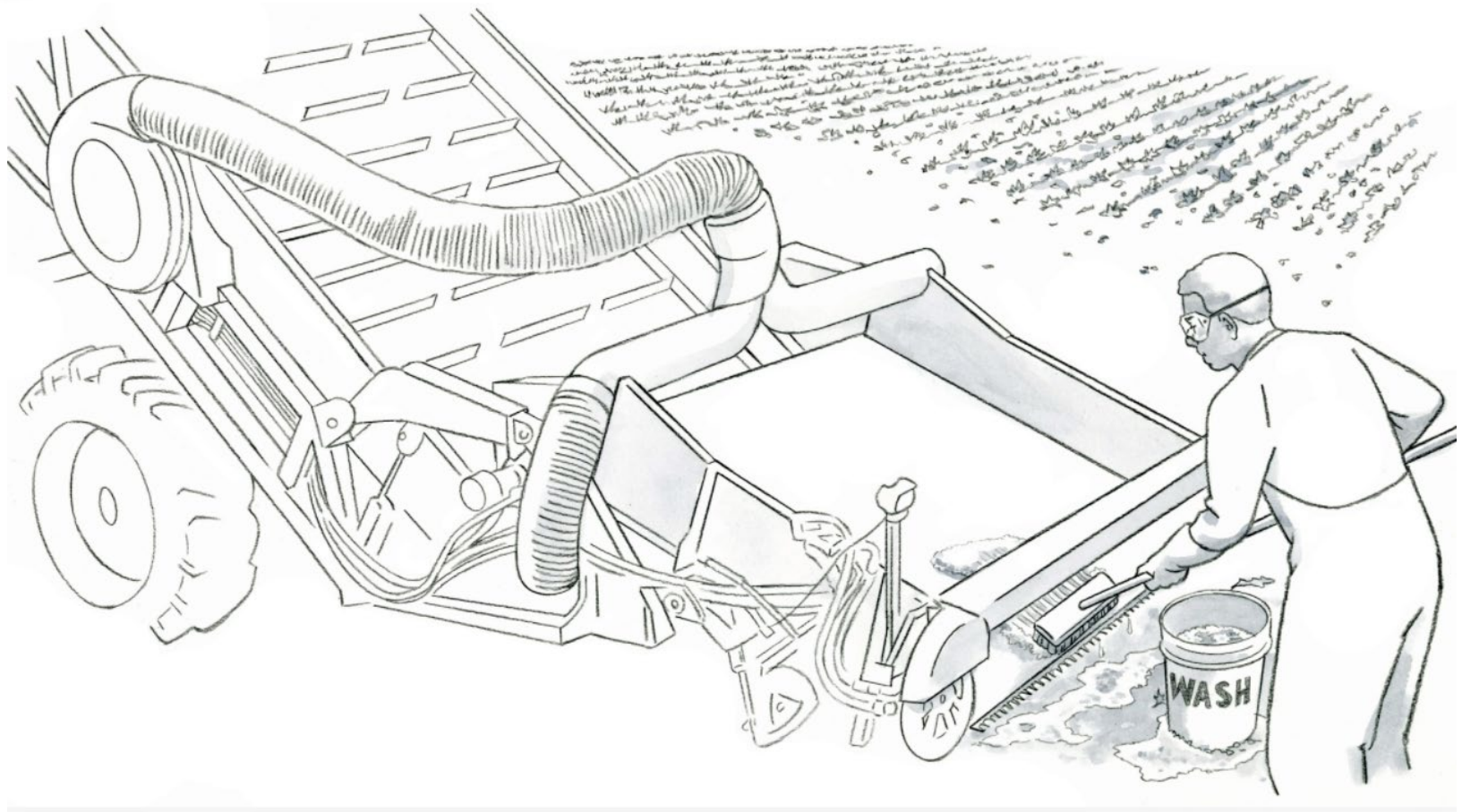




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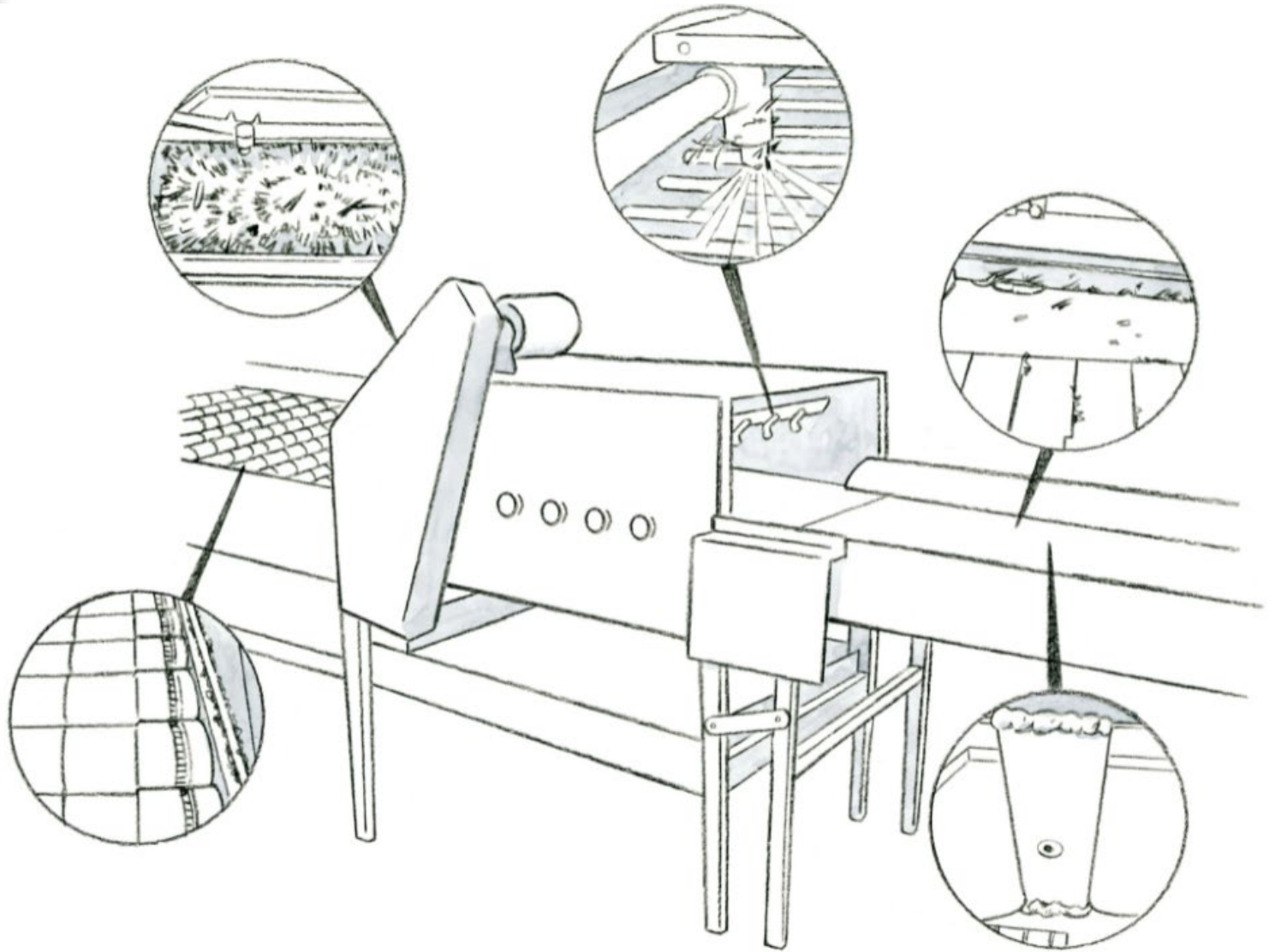








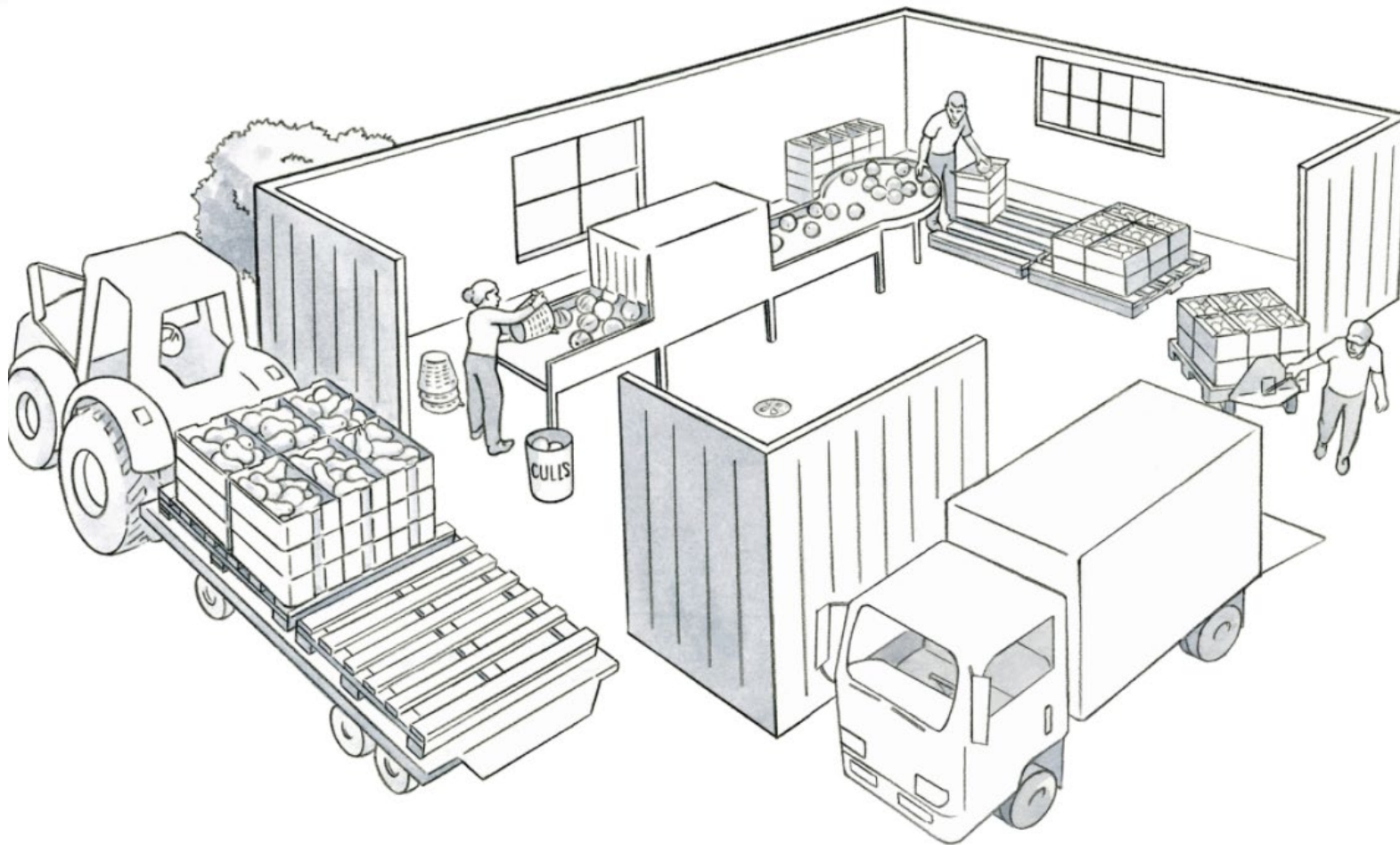
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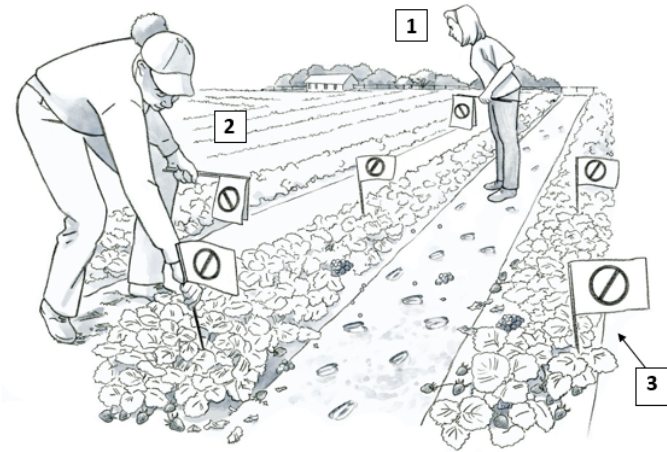




# Teaching Notes

- Each illustration is accompanied by an illustration guide and teaching notes
  - Key teaching points
  - Relevant FSMA references
  - Suggested location for use in PSA GT
  - Supporting resources

Establishing No Harvest Buffer Zones  
Illustration Guide and Teaching Notes



#### Key Teaching Points

1. Workers must be able to recognize when produce must not be harvested. This requires training and understanding food safety risks in the field, such as those from wildlife or domestic animals. Review § 112.22(b)(1), § 112.83, and § 112.112. In this illustration, two workers scout for evidence of animal intrusion and fecal contamination in a strawberry field prior to harvest. Visible hoof prints and deer feces are shown in the rows as well as in the path between the rows of strawberries.
2. While buffer zones are not required to be established by the FSMA Produce Safety Rule, they are one way to manage risk. Buffer zones may vary from a 1-25 foot radius, depending on the type of feces, extent of the contamination, and environmental conditions such as prior rain or wind events. Growers should also consult with current industry guidance and marketing agreements for specifics of buffer zone distances required for certain commodities such as leafy greens.





# <https://producesafetyalliance.cornell.edu/training/trainer-resources/more-words/>

[Home](#) / [Resources](#) / [Trainer Resources](#) / More than Words

## More Than Words

Illustrations provide a powerful and effective way to communicate concepts without the use of text. The PSA Grower Training Course teaches individuals about the Food Safety Modernization Act (FSMA) Produce Safety Rule (PSR), how to assess produce safety risks, and implement practices to reduce identified risks. This training contains complex regulatory language and scientific information, which can be difficult to understand. Incorporation of illustrations will provide an opportunity for learners to engage with the information in a different way to enhance their learning experience. These illustrations allow growers to consider risks they may have on their farms, practices that could reduce these risks, and regulatory provisions that may be relevant if they are subject to the FSMA PSR.

### Downloads



#### Avoiding the Harvest of Contaminated Fruit downloads

- [High resolution image - Avoiding the Harvest of Contaminated Fruit](#)
- [Teaching guide - Avoiding the Harvest of Contaminated Fruit](#)



#### Establishing No Harvest Buffer Zones downloads

- [High resolution image - Establishing No Harvest Buffer Zones](#)
- [Teaching guide - Establishing No Harvest Buffer Zones](#)



#### Harvest Bin Inspections downloads

- [High resolution image - Harvest Bin Inspections](#)



# Subpart E Proposed Rule

- Released December 6, 2022
- PSA has created 2 supplemental slides for Module 5.1 to alert participants and encourage them to comment on the proposed rule
  - <https://producesafetyalliance.cornell.edu/sites/producesafetyalliance.cornell.edu/files/shared/documents/Supplemental-Info-Supbart-E-Revisions.pptx>
- PSA plans to host regional and Spanish-Language focus group with growers to gather comments
- Also currently hosting calls for educators...



# Subpart E Office Hours

- PSA has been hosting office hours to discuss the proposed Subpart E requirements
  - Align educators' understanding of the proposed rule
  - Encourage participants to submit comments to FDA
- Two more English-language office hours:
  - February 1 at 1pm EST:  
<https://cornell.zoom.us/join/BZUCQj4>
  - February 8 at 3pm EST:  
<https://cornell.zoom.us/join/RwCTN2>
- A Spanish-language office hour is being planned



# The PSA Website

<http://producesafetyalliance.cornell.edu/>

**En español:** [es.producesafetyalliance.cornell.edu](http://es.producesafetyalliance.cornell.edu)

The screenshot shows the homepage of the Produce Safety Alliance website. At the top, the title "Produce Safety Alliance" is displayed in a red serif font. Below it is a navigation menu with links for "Training", "PSA Curriculum", "Resources", "News", "Food Safety Modernization Act", "The Alliance", and "Contact Us". The main content area features a large photograph of a farmer operating a red tractor in a field with a center pivot irrigation system. Below the photo is a red banner with the text "WELCOME TO THE PRODUCE SAFETY ALLIANCE WEBSITE!". To the left of this banner is the Produce Safety Alliance logo, which consists of the words "Produce Safety" in a green sans-serif font above the word "ALLIANCE" in a smaller, all-caps green sans-serif font. Below the logo is a short paragraph: "Providing fundamental, science-based, on-farm food safety knowledge to fresh fruit and vegetable farmers, packers, regulatory personnel and others interested in the safety of fresh produce." To the right of the main photo is a smaller thumbnail image of a field with irrigation, with the text "Water Summit Meeting" and "The Produce Safety Alliance hosted a Water Summit on February 27-28, 2016 at the" below it.



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