

Introduction

Good morning and thank you for allowing me to speak before this committee today. My name is Kent Schescke and I serve the National FFA Organization as the Director of Strategic Partnerships. I have been a part of the National FFA Organization for over 20 years in a variety of roles and functions. Prior to joining the National FFA staff I worked as an agricultural education instructor and FFA Advisor in three different high schools in Missouri. I am here today not only representing the National FFA Organization and over 540,000 young people who are members, I am also here to speak on behalf of school-based agricultural education programs in nearly 7,500 public schools and nearly 800,000 high school students being served through those programs. For students to be members of FFA they must be enrolled in an agricultural education program. FFA is an integral part of the agricultural education instructional model.

Background on School-based Agricultural Education

Today I am here to speak on the impact of these proposed roles to school-based agricultural education and how it impacts the experiential learning experiences of our students. School-based agricultural education programs began nearly a century ago as a way to better prepare young people to enter into careers in agriculture. In 2012 we are still focused on that goal-however our programs have grown and evolved to encompass the business, science and technology of modern agriculture. Today there are nearly a million students (including program at the middle school and Junior High and 2 year post-secondary) enrolled in school-based agricultural programs across the United States. There are over 7,500 in public middle and high schools with over 11,000 trained agricultural instructors working with students on a daily basis.

The model of school-based agricultural education combines three integrated components. First is the classroom where students receive formal instruction related to agricultural sciences. These courses are sequential and offer students the opportunity to explore many potential career options as well as learn science, technology, engineering, and mathematics (STEM) in the applied context of agriculture, food, and natural resources. Safety education has always been, and continues to be, an important part of the classroom and laboratory instruction we provide.

The second component is experiential learning which we refer to as Supervised Agricultural Experience or SAE. This part of the program occurs predominately outside of the classroom and outside of the school but is supervised by the agricultural instructor. Supervised agricultural experience programs come in many forms including entrepreneurship, placement, research and service learning. While historically many of our students come from farms, today a large number, roughly two-thirds, do not have that opportunity. These students are very interested in learning about agriculture and the experiential learning programs, especially placement, provide a great way for the students to learn the application of what is taught in the classroom.

The third component is leadership, citizenship and personal growth we teach through the FFA. FFA not only helps students grow as leaders and productive citizens it also provides students the ability to maximize the learning opportunities from both the classroom and supervised agricultural experience program. Many people view FFA as a separate organization but in reality it is an engagement tool our teacher use to make sure that students are maximizing their learning experiences through agricultural education.

As agricultural educators we go above and beyond to help our students succeed. We care very much about our students and we care especially about their safety. That is why we put a strong emphasis in our programs on teaching safety and making sure students understand how to apply these lessons in the real world.

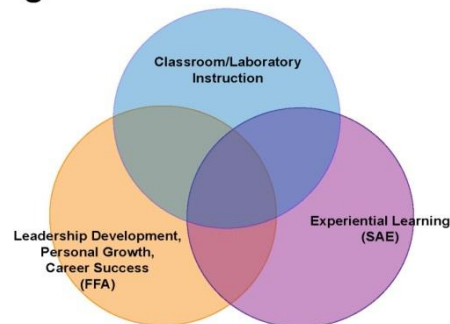
Our biggest concern with the proposed changes to the child labor regulations is that these changes will limit, if not eliminate, our opportunities to TEACH students to be safe when working in agriculture. Please allow us to continue to TEACH students to be safe while working in agriculture.

Specific Comments

Our major concern with the DOL NPRM is the Student Learner Exemption. The existing provisions of the Fair Labor Standards Act (FLSA) provide an exemption for students enrolled in vocational training in agriculture. Today, those programs are referred to as school-based

agricultural education and are a part of career and technical education. Counting our middle school through 2 year post-secondary students there are nearly a million students are enrolled in these programs across the United States and its territories. Some 7,500 such programs are available through primarily public high schools, and instruction is provided by 11,000 highly qualified teachers certified to teach agriculture. These programs play a critical role in educating young people and introducing them to careers in agriculture and agricultural science.

Agricultural Education Model



Since its inception nearly a century ago, the model of delivering high-quality, effective instruction in agriculture has been centered around three critical integral components. First is the *classroom/laboratory* setting in which students receive formal academic, hands-on instruction related to agricultural sciences. These courses are organized sequentially and offer students opportunities to explore myriad career options as they learn science, technology, engineering and mathematics (STEM) through the applied context of agriculture, food and natural resources. Safety education has always been, and continues to be, an important part of the classroom and laboratory instruction.

The second component is *experiential learning*, also referred to as supervised agricultural experience, or SAE. This part of the program takes place predominately outside of the classroom and school, but it is supervised by the agricultural instructor. Supervised agricultural experience programs come in many forms, including entrepreneurship, placement (at a job site), research and service-learning. While historically many of our students come from farms, today a large number, roughly two-thirds, do not have that opportunity. These students are very interested in learning about agriculture. The experiential learning programs, especially in

placement job settings, provide invaluable opportunities for students to learn the application of what is taught in the classroom/laboratory environment. A recent review of supervised agricultural experiences showed that one in three students received their experiential learning through placement experience.

The third component is *leadership, citizenship and personal growth* that is taught through the National FFA Organization. FFA, a student organization formerly known as the Future Farmers of America, not only helps students grow as leaders and productive citizens, it also provides students opportunities to maximize learning from both the classroom/laboratory and supervised agricultural experience environments.

Agricultural educators go above and beyond to help students succeed. They care deeply about their students, regarding their safety. That is why agricultural education programs place strong emphasis on teaching safety and ensuring students understand how to apply these lessons in the real world.

A major concern with the proposed changes to the child labor regulations is that these changes will limit, if not eliminate, our opportunities to TEACH students to be safe when working in agriculture. If the proposed rules go into place unchallenged, most of these learning opportunities, especially those that take place in the first two years of the instructional program, would be lost or seriously compromised. A recent sample of Supervised Agricultural Experience data across several states indicated that 36% of first and second year agricultural education students were involved in agricultural placement type supervised agricultural experiences. Please allow us to continue to TEACH students to be safe while receiving relevant work experience in agriculture.

The school-based agricultural education community (students, teachers, parents, state supervisory staff and other industry stakeholders) and the supporting agricultural community have serious concerns about many of the proposed rules. Because the majority of the students we serve begin their involvement in agricultural education at age 14, the proposed rules would

severely limit or eliminate opportunities to participate in the experiential learning aspects of our program.

We appreciate the recognition of the education and training our programs provide students. The current regulations make this central to the application of the law; however, the proposed regulations and expanded Hazardous Occupation areas (H.O.'s) either do not include the student learner exemption, or they limit severely the opportunities for students enrolled in agricultural education programs to be involved. We believe it is more responsible to teach students to be safe, rather than to tell them, "Oh don't do that, you might get hurt."

Ultimately, we are concerned about the limits these rules provide on the ability and opportunities for our students to *learn by doing*. "Learning by doing" is a critical part of the preparation and education through which we prepare students for careers in agriculture and related occupations. In addition, if these rules go into place, what reason or incentives do our teachers have to continue to place such a heavy emphasis on safety?

Agricultural education teachers realize they have a responsibility to work with their students, provide supervision, deliver safety instruction and work with employers of students so that the supervised agricultural experience is educational, meaningful and safe. They also recognize the role they must play in working with the students' parents, employers and student themselves to have well-documented training agreements that clearly identify appropriate Ag H.O. and safety requirements.

We reiterate the commitment and concern we share for the safety of our students. We believe that through education, safety instruction and supervision, we provide safe learning environments for students that help them succeed in the industry of agriculture. This is important to our communities, our states and the nation. Continue to allow us to continue to TEACH students to be safe while learning and working in agriculture.