

**APPENDIX N:  
INTERVIEW QUESTIONS FOR WHD STAFF INVOLVED IN AGRICULTURAL INVESTIGATIONS**

WHD is working with Eastern Research Group, Inc. (ERG) to perform an evaluation of the Child Labor program. As part of this evaluation ERG will focus on how to improve compliance with child labor laws in agriculture as well as how to reduce injuries, illnesses and fatalities to youth agricultural workers. The purpose of this interview is to gain a more complete understanding of WHD's approach to agricultural investigations and the challenges facing investigators; identify opportunities for WHD to extend and target compliance assistance to agricultural employers; and, the key issues to address in outreach to youth agricultural employees.

**I. Enforcement and Compliance**

***Agricultural Investigations:***

1. How does your office select the pool of employers for agricultural investigations?
  - What regulations do agricultural investigations focus on?
  - What jurisdiction do farm labor contractors fall under? How frequently are they targeted for investigations? Where does the investigation take place – at the contractor's office (if they have one) or at the current worksite?
  - Thinking about child labor laws, what types of agricultural employers do minors tend to work for? Does WHD target employers based on this trend?
  - How often does WHD target employers based on referrals from other agencies (state or federal)?
  
2. In general, what proportion of investigations from your office are investigations of agricultural employers?
  - How frequently are reinvestigations done? How many of the agricultural investigations done each year are reinvestigations?
  - In your opinion, should WHD focus more or less attention on agricultural employers? If more, which types of agricultural employers need more attention? If less, why do you think so?
  
3. When are investigations of agricultural employers done – what time of year? What days of the week? What time of day?
  - How does this differ for investigations of agricultural employers who hire youth workers?
  
4. What happens during an agricultural investigation?
  - Does the employer receive advance notice?
  - Who do investigators talk to?
  - What kinds of materials do investigators hand out?
  - How does an agricultural investigation differ from a non-agricultural investigation? What degree of emphasis is placed on identifying child labor violations?
  
5. How often does your office do joint investigations of agricultural employers with other agencies?
  - How often do WHD investigators refer cases to other agencies?
  - [If so] How successful do you think are the joint investigations or referrals?

***Agricultural Enforcement and Compliance Challenges:***

6. A report by GAO in 1998 identified the following challenges to identifying child labor violations in agriculture: the temporary nature of the work, geographic dispersion of the work, low wages

and lack of job security, informal communication networks that warn of investigations, and worker demographics (esp. language barriers).

- Are these challenges still relevant to your experience?
  - Which ones best describe the current challenges faced by investigators? What does this list leave out?
7. What suggestions do you have for improving the way WHD targets employers for agricultural investigations? For conducting agricultural investigations?
  8. What are the primary compliance problems for agricultural employers?
    - In your discussions with these employers, what types of questions do they ask most frequently?
  9. What are the primary compliance problems for agricultural employers with respect to child labor?
    - Do agricultural employers treat youth workers differently than adult workers? For example, are they given different tasks to do or more supervision due to lack of experience smaller size?
  10. In your opinion, how effective are civil money penalties for discouraging child labor violations in agriculture? Why do you think this is the case?

## **II. Compliance Assistance and Outreach**

### ***Assistance to Agricultural Employers:***

11. What types of compliance assistance does your office provide to agricultural employers outside of investigations?
12. Are there any agricultural partnerships active in your [district office/region]?
  - Who are the partners?
  - Is this a formal partnership?
  - How does each partner help WHD with agricultural compliance or outreach?
13. In your opinion, how effective is the compliance assistance provided to agricultural employers?
  - What aspects of the assistance are the most effective (i.e. materials, face-to-face consultations, partner involvement)?
14. What suggestions do you have for improving the way WHD provides compliance assistance to this audience?
  - What activities, events or materials would be useful to this audience?
  - What type of information should be included in the materials provided to this audience?

### ***Outreach to Youth Agricultural Workers:***

15. What types of outreach does your office provide for agricultural workers?
  - Is there outreach directed to youth agriculture workers?
16. With respect to WHD and child labor law compliance, what are the most significant issues for youth agricultural workers?
  - What risks/challenges do youth agricultural workers face?

- In what ways are the challenges facing youth agricultural workers different from those facing adult agricultural workers?
17. In your opinion, how effective is the outreach provided to agricultural workers?
- What aspects of the outreach are the most effective (i.e. materials, face-to-face consultations, partner involvement)?
  - What topics deserve more attention?
18. What suggestions do you have for improving the way WHD provides compliance assistance to this audience?
- What activities, events or materials would be useful to this audience?
  - What type of information should be included in the materials provided to this audience?