

Small Farm Internship Pilot Project 2011
Final Report for the Washington Legislature

Abstract

Chapter 160, Laws of 2010 (Senate Bill 6349), directed the Washington Department of Labor and Industries to establish a Small Farm Internship Pilot Project to allow individuals to work on small farms, as a means to learn about farm practices and enterprise. During 2010 and 2011, farms in Skagit and San Juan Counties were eligible to enroll in the pilot. The following report outlines the project's scope of work, the level of participation in the project, evaluates the impact resulting from the project, describes stakeholder involvement and input, and puts forth recommendations to ensure greater compliance with labor regulations in the future.

Table of Contents

- I. Executive Summary
 - A. Background
 - B. Summary

- II. Project Scope of Work
 - A. Project Development
 - B. Outreach
 - C. Participants
 - D. Survey
 - E. Analysis

- III. Farm Internships in WA: Outside the FIP
 - A. Existing Infrastructure
 - 1. Education
 - 2. Placement
 - 3. Post Internship
 - B. Stakeholders and Advocacy

- IV. Future Considerations

- V. Appendices
 - A. Press and Publicity on Farm Internship Project
 - B. Internal Documents for Project
 - C. Related Reading
 - D. Resources for Farm Internships

I. Executive Summary

A. Background

The face of agriculture is undergoing change in Washington State. The U.S. Department of Agriculture's (USDA) 2007 Census of Agriculture reflects these changes. The average farmer is now 57 years old, which is older than ever before. Further, while there are more farms today than there have been for ten years, they are getting smaller in size. Many "new farmers" come from non-farm backgrounds. Sales from these small farms are increasing rapidly with customers' interest in supporting local farms. Federal and state agencies have responded to these changes. The USDA has increased its support for initiatives to train and prepare new farmers through its Beginning Farmer and Rancher Development Program. The Washington State Department of Agriculture (WSDA) Small Farm and Direct Marketing Program, developed specifically to address the needs of the growing sector, have been awarded numerous accolades, representing the state's commitment to supporting small farms. Along with the increased support from federal and state government, small farms are also coming under the scrutiny of regulators nationwide for issues related to agricultural labor hiring practices.

Small farms, especially those which identify themselves as using "sustainable" or "organic" techniques, have historically relied on informal networks of "internships" for affordable labor. These informal internships also serve as a tool to train the next generation of farmers. These informal internships are not addressed through regulations, and as a result, are not the subject of regulatory oversight. Though farm internships are widespread, many may be out of compliance with wage and hour regulations, Washington's minimum wage law, and industrial insurance requirements.

In 2010, the Legislature passed Senate Bill 6349, sponsored by Senators Ranker and Holmquist, creating a pilot project formalizing farm internships. The law created a "safe haven" for small farms using farm interns. The pilot aims to minimize legal risks for farms; while allowing interns to work on farms that provide a structured, approved curriculum as part of the training. This is the first law of its kind in the United States; therefore, this pilot project is being watched by the agricultural community nationwide.

Summary

The Small Farm Internship Pilot (FIP) project became effective in June 2010 and expired on December 1, 2011. Under the pilot project, small farms are required to apply to L&I for a special certificate to participate in the small farm internship program. In order to be eligible for the pilot project, the farms must:

- Be located in Skagit or San Juan Counties,
- Have gross sales of under \$250,000,
- Be current on all state taxes,
- Have no outstanding penalties, and

- Report and pay for workers' compensation, under a special classification, for all hours worked by the interns.

The law requires participating farms to demonstrate they utilize (1) a bona fide educational or vocational curriculum and (2) supervised training in farm work activities. A small farm may employ up to three farm interns at a time. All interns and farmers are required to sign agreements outlining the objectives, expectations, and remuneration associated with the internship. L&I staff is required to conduct one site visit to each participating farm to ensure compliance with program rules.

As of September 6, 2011, six farms have enrolled in the FIP project. Both the farms and interns are reporting high levels of satisfaction with this project. Their desire is to continue providing internships that are "sanctioned" instead of questionably legal. The farms and interns especially value the availability of worker's compensation for interns available through the FIP project. Farmers have reported that the quantity and quality of the educational component of their internships has increased as a result of participating in the project. All of the enrolled farmers said that they would recommend the program to other farmers. Interns have reported high praise for the educational component of their internships.

II. Project Scope of Work

A. Project Development

Between June 2010 and January 2011, L&I staff developed the FIP project as outlined in the law. Staff utilized the protocols and administrative policies of L&I's existing Employment Standards Programs, such as Farm Labor Contracting, to develop materials and processes for implementation. The first stakeholder meeting was held in June 2010 and generated significant input.

During the same time, L&I's Industrial Insurance Division developed three risk classes specifically for the FIP. These were completed in 2010 and ready for use when interns started work in 2011. The classes were developed for the pilot project in order to track hours reported for interns separately from general farm employment. The rates and activities associated with each of the three FIP classes are consistent with those used for standard employees on farms, ranging from low-risk, hand harvested crops to higher risk work with livestock and machinery.

Outreach

Staff conducted extensive outreach in San Juan and Skagit counties. Outreach included:

- Speaking at a Washington State University beginning farmer class in Mt. Vernon.
- Attending three San Juan Agricultural Resource Committee meetings.
- Distributing a press release to local news outlets, resulting in seven articles and editorials.

- Utilizing social networking via stakeholders.
- Educating L&I customer service staff at the Mt. Vernon service location.
- Conducting a radio interview for a local Mt. Vernon radio station.
- Creating a postcard which was sent to target farms in Skagit and San Juan Counties.
- Providing written materials at small farm events.

The program also participated in outreach events around the state to educate the farmers on labor regulations related to lawful internships. FIP provided staff and materials to reach approximately 600 customers at events statewide regarding both general employment, as well as, internships in venues such as: the WSU Small Farms conferences in Kitsap County and Spokane and presentations to six WSU Cultivating Success classes. Agricultural employers remain largely insulated, due to rural locales and historic precedent, making this a sector in need of outreach to achieve greater levels of knowledge around labor laws.

B. Participant Survey Data

The FIP project staff visited each farm participating in the pilot and surveyed farm owners and interns. The Program collected the following information as required by law:

Number of small farms that applied for FIP: Seven

Number of farms awarded FIP Certificate: Six

Number of interns employed: Nine

Nature of educational activities provided to interns: All farm mentors taught “on-the-job” while working in close proximity to the intern. Five farms hosted weekly discussion groups with required reading assignments. Five of the six farms used portions of the Western Sustainable Agriculture Research and Education (SARE) Farm Intern Handbook and Curriculum. Two of the farms set up reading resource libraries. All farms provided some access to the Internet for research. Two of the farm mentors registered and paid for interns to take related workshops or attend conferences.

Wages and other remuneration paid to interns: Four of the six farms provide housing to their interns with some amount of food also included. Monthly stipends varied from \$100 to \$800 per month, with the highest stipend paid to an intern who did not receive room and board. All of the interns reported that their remuneration was fair and as expected and promised.

Number and type of workers’ compensation claims from interns: There have been no injury claims reported at this time. Workers have one year from the date of an injury to file a claim.

C. Future employment plans of interns: All of the interns’ future plans include some professional involvement in agriculture. One intern plans to return to his home in New Jersey and lease land

from a retiring farmer. Another is applying to graduate school to study agriculture. A third plans to start his own urban vegetable farm in New York. Other interns report plans to work on other farms to learn more or work in the non-profit sector on food and farm issues.

FIP Participants

The six farms currently enrolled in the FIP represent the scale and diversity of small farms statewide. The farms are 5 to 40 acres, produce mixed vegetables and poultry, directly market through Community Supported Agriculture (CSAs) and/or farmers markets, and report a commitment to educate new farmers through internships. Participants include:

Heritage Farm: Jim Sesby and Christina Sesby-Dahl, owners

Jim Sesby and Christina Sesby-Dahl have been farming in the San Juan Islands for over 20 years. In 2009, L&I conducted an audit of Heritage Farm. This audit was generated by a complaint filed with L&I regarding workers' compensation coverage for his workers. The complaint was initiated off the farm and was not filed by an intern or employee. The audit found that the Sesby's were remiss in not paying workers' compensation premiums for their workers, whom they viewed as unpaid or informal interns and therefore ineligible for coverage. The Sesby's agreed to the fine without appealing the decision or asking for clarification on this complicated classification of worker. As a result, the owners have learned that noncompliance, even in a minor way, is an expensive and time consuming process.

A former teacher, Mr. Sesby reports that having interns gives him the opportunity to continue teaching while he follows his calling in agriculture. Heritage Farm's 39 acres are diverse, producing mixed vegetables, fruits, poultry, and dairy. Mr. Sesby meets weekly with the interns for a discussion group based on assigned readings from the Appropriate Technology Transfer for Rural Areas (ATTRA) Farm Mentor Handbook (more information below). When interviewed by FIP staff, his interns rated their experience at the farm as a nine/ten out of ten and felt education and safety were both strong priorities.

Mr. Sesby is greatly in favor of the project extending beyond the original pilot project.

Synergy Farm: Peter and Susan Corning, owners

Peter and Susan Corning, like many of the small farmers coming to agriculture in recent years, do not come from an agricultural background. Previously a college professor, Mr. Corning brings his experience and familiarity with teaching to his interns. The Cornings express a passion for training the next generation of farmers. They provide structured weekly seminars, encourage interns to participate in educational events around the county, and provide thorough on-the-job training. The interns report that the farm takes safety very seriously, providing detailed safety instructions with each new task as well as required protective gear such as ear plugs, masks, and gloves. Their three interns rate the internship as a nine/ten out of ten and are inspired to continue working in agriculture.

The Cornings report that they have recommend the FIP project to other farmers, in large part because of the ability to get workers' compensation coverage for interns. They have expressed a desire to see it

extended, but with the following changes incorporated: allowing for more than 3 interns, generating less paperwork, and not requiring the curriculum to be approved by L&I.

Sweet Earth Farm: Ron Zee and Elaine Kendall, owners

Ron and Elaine Kendall farm their 20 acres on San Juan Island with their daughter and granddaughter. They report that by participating in the FIP project, their farm is more desirable to potential interns. As a result, the farm has attracted serious students of farming who wanted formal training. Receiving workers' compensation is also seen as a benefit by their interns, as they do not have other medical insurance. Though they primarily use the Western SARE Farm Intern Curriculum and Handbook, they have also set up a resource library for their two interns. The interns both plan to continue working in agriculture after the internship, with one of the interns considering buying a farm from a retiring neighbor in New Jersey.

Blue Heron Farm: Anne Schwartz, owner

Anne Schwartz is a pioneer in organic farming in Washington State; she started growing vegetables commercially in the Upper Skagit Valley in 1979. Ms. Schwartz estimates that of the dozens of interns she has trained in the past, 15 of them have become farmers. As the President of Tilth Producers, the state's non-profit sustainable agriculture trade and education association, she has brought attention to the potential legal risks associated with training interns through informal internships. Ms. Schwartz reports that one of the benefits of her participation in the project is her ability now to train interns in the use of essential farm equipment, something she was unwilling to do previously without workers' comp coverage.

Highwater Farm: Jeff Ellsworth, owner

This farm successfully applied for participation in the project but decided they were not prepared to adequately train an intern. They did not hire any interns.

Gaia Rising Farm: Sequoia Ferrel, owner

Gaia Rising is a 30 acre farm in its first year of operation, perched on Guemes Island. The farm produces vegetable for a Community Supported Agriculture (CSA) membership. Ms. Ferrel started the season with two interns but scaled back to only one when teaching and farming concurrently became overly demanding. As Ms. Ferrel started her business, she was confused by the additional paperwork required for participation in the project, but found it beneficial to have workers' compensation coverage.

D. Analysis

The level of participation in the FIP was lower than anticipated (six farms have received FIP certificates). Extensive discussions with farmers and stakeholders in the area have identified the following reasons for low participation:

- **Poor fit for service area** - Small farms in San Juan County generally “fly under the radar” in regards to regulation and feel there is little risk of enforcement, due to the inaccessible location of the county. Farms in Skagit County are generally above the \$250,000 gross income requirement, disqualifying their participation. For these reasons, many farms in both counties did not participate.
- **Lack of trust** - Farms that currently do not report wages and/or pay workers’ compensation do not wish to get involved with L&I. They are worried that the agency will target them for future audits.
- **More paperwork** - Employers do not want to comply with more recordkeeping and reporting requirements.
- **Desires for exemption** - Many farmers have expressed a feeling that small farms should be exempt from all labor regulations due to the unique nature and the historical and social significance of the family farm.
- **Lack of continuity** - Some farms did not wish to participate without assurance that the project will continue in the future. They feel it is not worth the effort involved or that they will be targeting themselves for future investigations once they are “on the books.”
- **Short time frame** - The time frame for the pilot project was not long enough for some farmers to adapt to the changes. There was very little time and opportunity for “word of mouth” to spread through the farming community. Once the 2011 farming season started, farms believed it was too late to enroll.

Additional survey questions asked of farmers:

L&I’s survey asked supplemental questions in the survey of FIP participants in order to gather additional data. The questions and their responses are as follows:

1. Do you come from an agricultural background?

None of the participants came from an agricultural background, signifying the “new face” of agriculture.

2. How many acres do you own and operate?

The small farms averaged approximately 20 acres.

3. How would you rate your satisfaction with this program, specifically working with L&I? (using a scale of 1-10. 1 being dissatisfied and 10 being extremely satisfied)

A high rate of satisfaction was reported; an average of eight out of ten.

4. Did your participation change your hiring practices this year, intern or other?

One participant said they hired fewer interns this year to meet the limit of three. Otherwise, no farms reported any changes.

5. Would you participate again?

Of the six farms participating, four farms would like to participate again and one farm is uncertain.

6. Would you participate if there were a fee?

All of the participants would pay a “nominal” fee for the program, perhaps \$100, but not a lot more.

7. Would you choose to buy workers’ comp in the future for farm interns, if it were available?

All of the farmers want to purchase workers’ compensation coverage for their interns in the future.

8. How many interns did you have at your farm?

Farms enrolled in the project had 0 to 3 interns, average 2.

9. Did your participation change the educational component of your internship?

Three of the six participants reported “tightening up” and better organizing the educational component of the internship. Two farms did not change their educational offering (their previous curriculum was sufficient for participation). One farm did not have interns previously.

10. What do you perceive as the advantages of participating in the project?

The primary advantage listed by all the farmers was the ability to get workers’ compensation coverage and the peace of mind this provided. Four farmers stated knowing they were operating in compliance with state laws and not at risk of wage complaints or an investigation was advantageous. One farm felt that being in the program made their internships more attractive to potential interns.

11. Disadvantages?

Two farms fear being targeted in the future for having interns if the project does not continue. Two farms perceive the necessary paperwork a disadvantage. Another farm mentioned that there was significant confusion regarding taxes that was difficult and costly for the farm and the accountant. One farm felt that the expectation to teach a curriculum was too high and that L&I should provide support for this aspect.

12. Would you recommend other farmers participate?

All of the farms reported that they had already done so and would continue to recommend the project to others.

13. What changes would you recommend be made to the program?

Recommended changes include:

- Clarifying the number of interns allowed. For example, does three per year mean 3 full-time FTE? Is it a specific number of individuals? Three total per year?
- Giving the project more time before judging its success on this short timeline.
- Eliminating the uncertainty of whether the project will continue.
- Clarifying vagaries of unpaid internship requirements. For example, what is the specific meaning of the requirement that a business should derive no immediate advantage from interns and that the curriculum must be “similar to that received in vocational training”.
- Reducing amount of paperwork and clarifying the paperwork received from Industrial Insurance.

Additional survey questions asked of interns:

1. Were you aware of your participation in the Small Farm Internship Project?

All of the interns interviewed were aware of their participation in the FIP.

2. How would you rate your satisfaction with your internship? (using a scale of 1-10. 1 being dissatisfied and 10 being extremely satisfied)

- Four interns gave their experience a rating of ten out of ten.
- Two interns gave their experience rating nine out of ten.
- One intern gave their experience rating eight out of ten.
- Two interns gave their experience rating six out of ten.

3. Did you feel there were clear expectations communicated between you and the farmer?

Seven of the nine interns reported having clear expectations of responsibilities and remuneration before their internship began and that these have been met. The additional two did not feel the expectations had been met, but were working with the farmer to remedy the situation.

4. How would you rate the quality of the educational experience of your internship? (using a scale of 1-10. 1 being dissatisfied and 10 being extremely satisfied)

- Seven interns gave an average answer of 8.5 out of ten, with none below eight, indicating they were very satisfied with the educational component of their internship.
- Two interns ranked the educational component a 4.

5. What, if any, safety elements were present in your work and training?

All interns felt that safety was a priority and reported that all of the participating farmers explained safety protocols when introducing a new task. Specific examples included: providing ear plugs when operating machinery, demonstrating safe material application methods, thoroughly explaining the nature of equipment, discussing back safety and weather-appropriate clothing.

III. Farm Interns in Washington: Outside the FIP

A. Existing Infrastructure and Support for Informal or Unpaid Farm Interns

Washington’s small farm sector includes many stakeholders and their involvement extends into farm internships as well. Community based groups are involved in the placement of interns on appropriate farms, providing educational opportunities, and creating “next steps” upon completion of training.

1. Education

WSU Jefferson County Extension’s Farmer Innovation Education Leadership Development Program is one example of a local initiative that places interns and provides education. Participating farms coordinate weekly workshops, field trips, and visits to other community organizations to broaden the scope of the internship. Interns are required to enroll and pay for Continuing Education credits through WSU, allowing farms to use the accredited “Cultivating Success” curriculum. The program requires farms to carry liability insurance and the interns to provide proof of private health insurance. Interns and farmers in the program met with FIP staff and reported very high levels of satisfaction with their participation.

The Small Farms Team at WSU Extension created a statewide program called “Cultivating Success” that includes an accredited curriculum available to farmers and those who attend the courses. A component of “Cultivating Success” includes a Farmer Mentor internship that links beginning farmers with farmers that are trained and guided in being effective mentors. Specialized curricula are developed for each farm, and interns can choose to take WSU coursework and receive one of two certificates upon completion.

WSU provides many resources and opportunities for farmers and interns throughout the state. Through the Cooperative Extension and emerging technologies, educational resources are widely available for interns to obtain training that is “similar to that which would be given in an educational environment or vocational school”, a requirement in training informal or unpaid interns.

Community colleges, private colleges, University of Washington, and The Evergreen State College all have students studying sustainability and food systems with a large interest in local agriculture. Many of their students will complete internships, providing the institutions the opportunity to play an active role in providing the educational component of internships on small farms. California and Oregon farm

internship programs rely heavily on community colleges to increase compliance with internship laws, as well.

ATTRA, the National Sustainable Agriculture Information Service (a USDA-funded project), publishes a Farm Mentor Handbook for farms hosting interns, as well as a curriculum and corresponding field study modules to be used for on-the-job training on small farms. The curriculum is written by staff from Oregon State University and assists farms in meeting the educational component of legal internships.

2. Intern Placement

ATTRA also hosts an internship listing service where farms from around the country advertise for internship positions. Washington has 154 farms listed on this site. *(Please see Related Resources at the end of this report for links to the ATTRA site).*

Tilth Producers, the statewide sustainable farmers' trade association, has an internship placement "match-making" service which connects farmers with interns looking for learning opportunities.

3. Post- Internship

Washington Farm Link works to connect beginning farmers (typically former interns) with farmland that is under-utilized, often by aging and retired farmers, and assist with land purchase or lease. They also provide business planning assistance and aid in connecting beginning farmers with appropriate financing.

B. Stakeholders and Advocacy

Stakeholders around Washington have been meeting as the Coalition for Small Farm Internships. The group is engaged in discussing the extension and/or expansion of the FIP pilot project. Participants include: Washington Farm Bureau, the Washington Sustainable Food and Farm Network, the San Juan Agricultural Resource Committee, the WSDA Small Farm Direct Marketing Program, WSU Small Farms Team, Cascade Harvest Coalition, WA Farm Link, and Tilth Producers. The Coalition drafted and submitted to FIP staff the following reasons to support additional legislation to allow for regulated internships statewide:

Arguments supporting farm internships in Washington:

1. Small farm internships are **well-situated to meet state and federal requirements** for unpaid internship.
 - Small farms usually have an owner/operator present and are able to demonstrate and teach on-the-job skills. Interns can work under close supervision of the farmer.
 - The work on small farms is diverse, often manual, and varies throughout the day, giving an intern an ability to learn a broad range of tasks. Interns on small farms are unlikely to be doing one repetitive task, making their role unlike an employee.

2. **Training the next generation** of farmers has been identified as a priority by the USDA and the WSDA.
 - An aging landowner base and a growing number of new farmers from non-agricultural backgrounds create a demand for training opportunities.
 - Few formal training programs exist for beginning farmers.
3. Small Farms are increasing in number and in sales, **creating economic opportunity** and development in rural communities.
 - Between 2002 and 2007, the number of farms increased statewide by nearly 4,000, while the size of the average farm dropped by over ten percent. The average value of farm product sold increased in that time from \$148,000 to \$173,000, a 17 percent increase. (USDA Census of Agriculture).
 - Farmers markets continue to thrive and expand nationwide, representing the interest in supporting local farms.
4. Ninety percent of farms in Washington are considered “Small Farms”, with sales less than \$250,000 as defined by the USDA. A program for small farm internships would be **widely available** to 35,000 of the state’s 40,000 farms.
5. **Curricula are readily available** to farmers to use in the educational components of their internships, including one that is accredited by WSU and widely used in County Extensions already, as well as on-line applications.
6. **Internships are wide-spread and ubiquitous and will continue regardless of an existing program.** Providing workers’ compensation and oversight makes these internships safer, more compliant, less costly to investigate, and easier to track.
7. **Setting a precedent:** Washington is on the cutting edge of agriculture; The Farm Internship Pilot Project is no exception, as it is the first of its kind in the country. Many states and organizations are watching to see if the project provides a solution to the nationwide problem of noncompliance.

National Interest

A task force on the farm internship programs has been spearheaded by ATTRA, initiated at a national conference on farm-based internships. The group also includes members from the non-profit sector, lobbyists, farmers, educators from community colleges, and representatives from Oregon Bureau of Labor and Industries and California Department of Industrial Relations. The group is looking into options for compliant internships and to create models that can be replicated nationally. The future of the Small Farm Internship Pilot Project is of particular interest to the group as the first of its kind.

The FIP project staff has also received numerous phone calls from around the country with inquiries regarding the details and outcomes of the project. These contacts include: a law firm in central California, a non-profit in Vermont, a community college in Oregon, and a trade group in California.

IV. Future Considerations

In August of 2011, L&I staff conducted an online survey of farmers and stakeholders to assess future interest in the Farm Internship Project. The survey was distributed via email to farms that advertise looking for interns, as well as via list serves to the small farm community. While it is unknown how many people received the survey, 141 farms responded.

The data showed overwhelming support for continuation or expansion of the FIP. Over eighty-eight percent of respondents indicated that they would be likely to have interns on their farm if a program existed that would help them comply with regulations.

When asked how familiar they were with regulation relating to internships on farms on a scale of one to ten, nearly one-quarter of respondents chose one, least familiar. Less than ten percent chose nine or ten, which equated to most familiar.

The Counties that stated the most interest in having a program available (and the number of respondents) included:

King (22)	Skagit (5)
Whatcom (10)	Jefferson (5)
Kitsap (7)	Island (5)
Pierce (7)	Thurston (5)
San Juan (6)	

The survey allowed for comments on this issue to be left anonymously. Many comments fit into the following categories:

- Twenty two respondents stressed **the need to train the next generation** of farmers.
- Sixteen commented that they would like L&I to continue the FIP to help farmers **better comply with regulations**.
- Ten respondents felt there are **too many regulations** and they did not trust L&I to implement a useful program.
- Ten comments referred to the **desire to secure workers' compensation** for interns.

Overall, the survey reflected a strong desire on behalf of farmers to extend and expand the Farm Intern Project. The relatively high level of participation reflects a strong interest in this subject. The counties

with the highest number of positive responses, listed above, would be obvious choices for potential expansion.

The results also indicate that there significant misunderstanding or lack of understanding of labor regulations among small farms, a sector that is growing in both numbers and economic impact. Continuing outreach to this population may increase compliance in the future, as it is likely that farm internships will continue with or without the Small Farm Internship Project.

Stakeholders and farmers have also made clear that *with or without a formal internship project*, there is a willingness and desire to provide workers' compensation coverage for unpaid farm interns. Currently, only a very small number of interns in the state are covered - those volunteering for non-profits, school-aged kids in training programs, and those in the FIP. Their contention is that making workers' compensation coverage available to unpaid or non-employee farm interns would provide protection for both trainees and farmers.

Conclusion

Though enrollment was lower than expected, the Small Farm Internship Pilot Project achieved many important objectives, some unforeseen. These include:

- The implementation of a project that was initiated by the small farm community that needed the protections it offered.
- Participants were extremely satisfied with their involvement and recommend it to other farmers.
- The pilot project was adopted and carried out in a smooth and efficient manner.
- The agency developed key strategic relationships with stakeholders.

Most importantly, the Small Farm Internship Project has allowed the small farm sector, a bright spot in the state's economy, and L&I to get acquainted and better understand how one another operate. This has great benefit for both parties that will hopefully be built upon in the future.

V. Appendices

A. Publicity on the Small Farm Internship Project:

Capital Press: "Audit leads to intern program". March 31, 2011

<http://www.capitalpress.com/content/SB-intern-farmer-040111-art>

Capital Press: "Intern program deserves to extend". April 7, 2011-06-08

<http://www.capitalpress.com/content/cs-intern-editorial-040811>

Islands Sounder: "Sowing the seeds of knowledge". March 29, 2011

<http://www.pnwlocalnews.com/sanjuans/isj/opinion/118846879.html>

Islands Sounder: "Planting a new seed: Small farm pilot project takes root in SJC". March 29, 2011

<http://www.pnwlocalnews.com/sanjuans/isj/news/118846329.html>

Occupational Health and Safety Online: "Washington L & I Trying Small Farm Intern Project".

<http://ohsonline.com/articles/2011/03/28/washington-trying-small-farm-internship-program.aspx?admgarea=news>

KAPS Radio and KSVR Radio coverage, May 2011-06-08

B. Internal Documents (Department of Labor and Industries):

Small Farm Internship Pilot Project fact sheet:

<http://www.lni.wa.gov/WorkplaceRights/files/2010FarmInternshipFAQ.pdf>

Small Farm Internship Project Application Form: <http://www.lni.wa.gov/Forms/pdf/F700-158-000.pdf>

Small Farm Internship Intern Agreement: <http://www.lni.wa.gov/FormPub/Detail.asp?DocID=2447>

Unpaid Internships 101 fact sheet:

<http://www.lni.wa.gov/WorkplaceRights/files/UnpaidInternshipsFactSheet.pdf>

C. Related Reading

Greenaway, Twilight. "Civil Eats » The Farm Intern Conundrum." *Civil Eats*. Web. 08 June 2011.

<http://civileats.com/2010/05/11/the-farm-intern-conundrum/>

Greenhouse, Steven. "The Unpaid Intern, Legal or Not". *New York Times*. April 2, 2010.

<http://www.nytimes.com/2010/04/03/business/03intern.html>

Greenhouse, Steven. "California Labor Dept. Revises Guidelines on When Interns Must Be Paid".

New York Times. April 9, 2010. <http://www.nytimes.com/2010/04/10/business/10interns.html>

Severson, Kim. "Many Summer Internships Are Going Organic ". *New York Times*. May 23, 2009. <http://www.nytimes.com/2009/05/24/dining/24interns.html>

Volheim, Erin. "Outlawing Farming Internships? — Oregon Tilth." *In Good Tilth*. Web. 08 June 2011. <http://tilth.org/education-research/in-good-tilth-magazine/articles/2008/19iii/outlawing-farming-internships>

D. Resources for farm internships:

"Oregon Department of Agriculture Farm Internships in Oregon." *Oregon.gov Home Page*. Web. http://www.oregon.gov/ODA/farm_internships.shtml#Farm_intern_programs

"Sustainable Farming Internships and Apprenticeships ." *ATTRA - National Sustainable Agriculture Information Service*. Web. <https://attra.ncat.org/attra-pub/internships/>

"Western SARE Farm Internship Handbook | Western Sustainable Agriculture Research & Education (SARE) Farm Internship Curriculum and Handbook." *ATTRA - National Sustainable Agriculture Information Service*. https://attra.ncat.org/intern_handbook/handbook.html

Cultivating Success. Web. 08 June 2011. <http://www.cultivatingsuccess.org/>