

Child Trafficking: Addressing Challenges to Public Awareness and Survivor Support (Accessible Version)

GAO-24-106038

Q&A Report to Congressional Requesters

December 11, 2023

Why This Matters

Human traffickers can target children in the U.S. to exploit them sexually, force them into labor, or both. Children can be targeted due to their age and other factors that make them vulnerable. Children experiencing poverty, homelessness, and juvenile justice or child welfare involvement, as well as foreign national children who arrive unaccompanied to the U.S., may be at greater risk of victimization. Survivors of child trafficking may suffer harmful, long-lasting effects, such as depression, suicidal thoughts, and substance use disorders.¹

There is limited data on the extent to which children are trafficked in the U.S. For instance, in 2021, the National Human Trafficking Hotline received reports of potential human trafficking involving over 3,000 potential victims who were children.² However, many incidents may not be uncovered or reported.

We were asked to review federal efforts to address child trafficking. This report examines challenges related to raising public awareness of child trafficking and supporting survivors. It also examines relevant federal programs managed by the Department of Justice's (DOJ) Office for Victims of Crime (OVC) and the Department of Health and Human Services' (HHS) Office on Trafficking in Persons (OTIP).

Key Takeaways

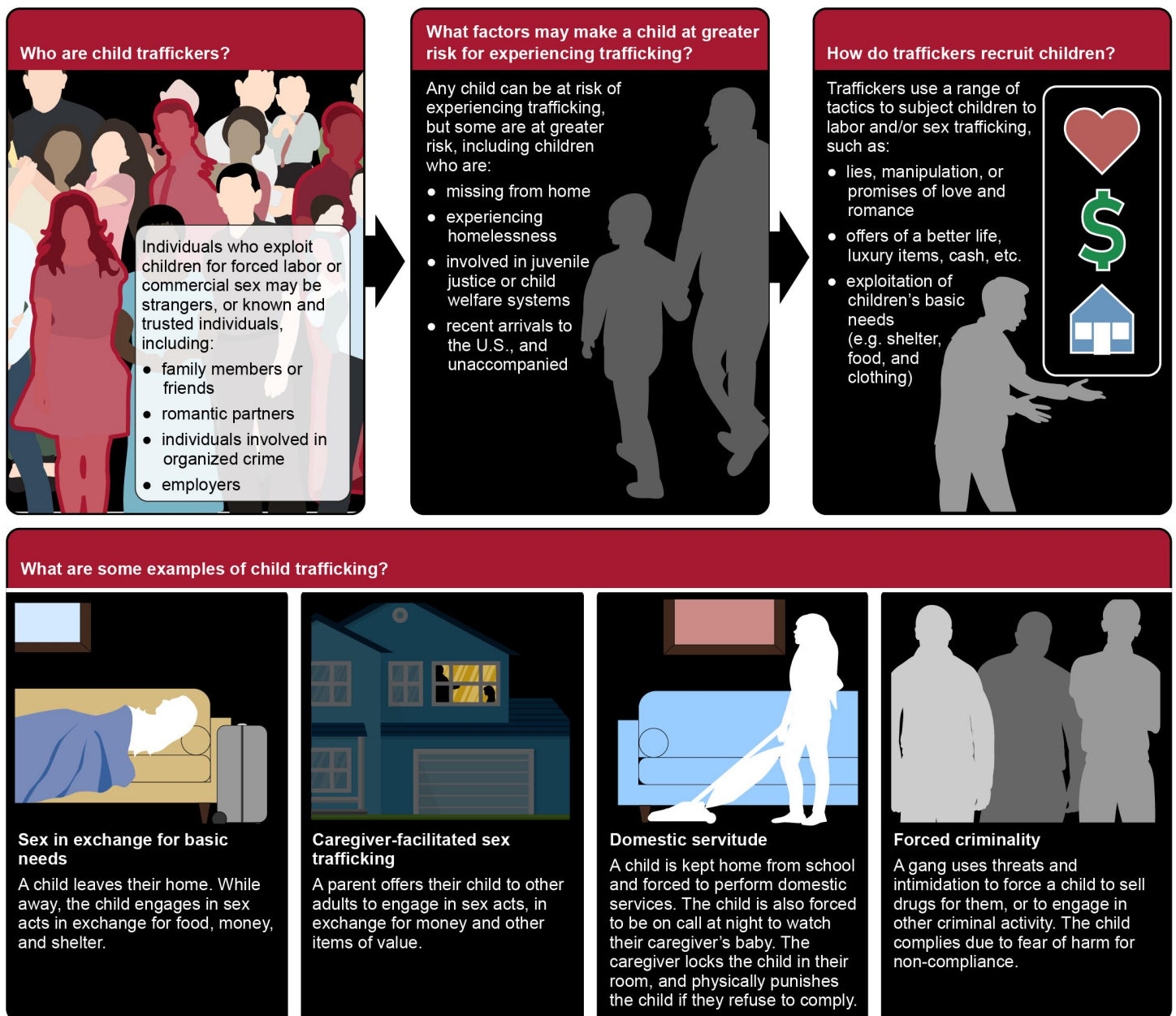
- Stakeholders reported that public misperceptions of child trafficking hinder efforts to raise public awareness and support survivors. For example, misperceptions exist about which children are trafficked, how children are trafficked, and what support children need. Other reported challenges included providing services to children who are detained by law enforcement, a lack of services for certain populations (e.g., boys, survivors of labor trafficking, and foreign national children), and limited data and research on child trafficking and programs to combat it.
- OVC and OTIP's collaboration mechanisms focus broadly on individuals of all ages who have experienced trafficking, but the offices do not have a collaboration mechanism dedicated to child trafficking. We recommend that the offices establish a collaboration mechanism focused solely on child trafficking. Doing so could better enable the offices to overcome challenges specific to children and meet the distinct needs of child trafficking survivors.
- OVC and OTIP have set strategic goals for their anti-trafficking programs for children. OTIP is also developing performance goals, but OVC has no plans to do so. We recommend that OVC establish performance goals to better measure the progress of its programs.

What is child trafficking and how does it happen?

Child trafficking generally refers to human trafficking involving individuals under the age of 18.³ As mentioned above, children may be trafficked for the purposes of commercial sexual exploitation, forced labor, or both. Child sex trafficking occurs when a child is asked or made to engage in a sex act in exchange for anything of value—such as money, controlled substances, or shelter, regardless of the use of force, fraud, or coercion. Child labor trafficking occurs when force, fraud, or coercion is used to obtain labor or services from a child for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.⁴

Children may be trafficked by their own family members, romantic partners, peers, employers, acquaintances, and strangers. Traffickers recruit children in a range of settings, including in person and online.⁵ Also, traffickers often build trust with children over time and establish control over them, while subjecting them to abuse. Figure 1 provides an overview and examples of child trafficking.

Figure 1: Overview and Examples of Child Trafficking



Source: GAO review of agency and stakeholder documentation; zolotans/stock.adobe.com (people illustrations); sivvector/stock.adobe.com (house illustration); GAO (illustrations). | GAO-24-106038

Accessible Data for Figure 1: Overview and Examples of Child Trafficking

Who are child traffickers?!

Individuals who exploit children for forced labor or commercial sex may be strangers, or known and trusted individuals, including:

- family members or friends
- romantic partners
- individuals involved in organized crime (e.g. pimps)
- employers

What factors may make a child at greater risk for experiencing trafficking?

Any child can be at risk of experiencing trafficking, but some are at greater risk, including children who are:

- missing from home
- experiencing homelessness
- involved in juvenile justice or child welfare systems
- recent arrivals to the U.S., and unaccompanied

How do traffickers recruit children?

Traffickers use a range of tactics to subject children to labor and/or sex trafficking, such as:

- lies, manipulation, or promises of love and romance
- offers of a better life, luxury items, cash, etc.
- exploitation of children's basic needs (e.g. shelter, food, and clothing)

What are some examples of child trafficking?

- Sex in exchange for basic needs: A child leaves their home. While away, the child engages in sex acts in exchange for food, money, and shelter.
- Caregiver-facilitated sex trafficking: A parent offers their child to other adults to engage in sex acts, in exchange for money and other items of value.
- Domestic servitude: A child is consistently kept home from school and forced to perform chores. The child is also forced to be on call at night to watch their caregiver's baby. The caregiver locks the child in their room, and physically punishes the child if they refuse to comply.
- Forced criminality: A gang uses threats and intimidation to force a child to sell drugs for them, or to engage in other criminal activity. The child complies due to fear of harm for non-compliance.

Source: GAO review of agency and stakeholder documentation; zolotans/stock.adobe.com (people illustrations); sivvector/stock.adobe.com (house illustration); GAO (illustrations). | GAO-24-106038

What federal grant programs, specific to child trafficking, raise public awareness and support survivors?

Many federal programs related to human trafficking serve individuals of all ages, but a smaller number of programs focus specifically on children.⁶ We identified six grant programs that solely support child survivors or are intended specifically to prevent and raise public awareness of child trafficking.⁷ Four programs are administered by OVC, and two programs are administered by OTIP.⁸

In fiscal years 2021 and 2022, OVC awarded grants to various non-federal organizations across the country to implement its anti-trafficking programs focused solely on providing services for children. Grantees receiving OVC

funding engage in a range of activities to help support child trafficking survivors and children who are at risk. For example, grantees provide residential services, therapy, legal assistance, life skills coaching, employment assistance, and assistance with applying for government benefits (e.g., food or medical benefits). Collectively, these OVC programs awarded a total of \$24.8 million to grantees in fiscal years 2021 and 2022 (see table 1).

Table 1: Department of Justice Office for Victims of Crime (OVC) Awards for Anti-trafficking Programs for Children, Fiscal Years (FY) 2021-2022

Program	Amount Awarded, FY 2021 (\$mil)	Number of Awards, FY 2021	Amount Awarded, FY 2022 (\$mil)	Number of Awards, FY 2022
Preventing Trafficking of Girls	1.3	3	3.5	7
Minor Victims of Sex Trafficking ^a	8.0	9	6.3	6
Minor Victims of Labor Trafficking	2.0	3	1.3	2
Enhancing Juvenile and Family Court Responses to Human Trafficking ^b	2.4	5	n/a	n/a
Total	13.7	20	11.1	15

Source: GAO analysis of agency information. | GAO-24-106038

^aIn FY 2022, OVC created the Field-Generated Strategies to Address the Criminalization of Minor Victims of Sex Trafficking program as an extension of the Minor Victims of Sex Trafficking program. This program's funding data is included in the Minor Victims of Sex Trafficking program data in the table above.

^bOVC awarded grants under this program in FY 2021 but did not make new awards in FY 2022.

In fiscal year 2022, OTIP awarded grants under two anti-trafficking programs for children.

- The Human Trafficking Youth Prevention Education Demonstration program granted, in total, \$3.4 million to school districts in fiscal year 2022.⁹ According to OTIP, these funds were awarded to eleven school districts, located in California, Georgia, Michigan, Nebraska, New York, Texas, and Utah. The program supports local school districts in delivering skills-based human trafficking prevention education to school staff and students, among other activities.
- OTIP awarded \$1.5 million to one grantee for the Aspire: Child Trafficking Victim Assistance Demonstration program. The program funds comprehensive case management and other supportive services to child survivors who are foreign nationals through a nationwide network of community service providers.

What misperceptions may hinder efforts to raise public awareness and support child trafficking survivors?

Over half of the 13 selected stakeholders we interviewed discussed misperceptions related to which children are trafficked, how children are trafficked, and what supports children need, among other topics.¹⁰ These stakeholders—a nongeneralizable sample of 13 nongovernmental organizations—are engaged in raising public awareness of child trafficking, providing support to child trafficking survivors, or conducting research, advocacy, or training and technical assistance related to these issues.¹¹ These stakeholders discussed various misperceptions that may hinder efforts to raise awareness and support survivors. For example:

- One stakeholder said that while Black girls are overrepresented in child trafficking incidents, the public may be less likely to view Black girls as trafficking survivors. The stakeholder said this may be due in part to limited representation of Black girls in public awareness materials.
- One stakeholder reported that some awareness campaigns portray child trafficking primarily as street-based commercial sexual exploitation, facilitated by an unknown third party. However, the stakeholder said that traffickers often engage children through online platforms. Children may also be trafficked in their homes or by trusted adults, including family members or caregivers, according to three stakeholders.
- One stakeholder said that individuals may think of child trafficking as only involving children who have been kidnapped or forced into trafficking. As a result, they may “victim blame” children in other types of trafficking situations, according to the stakeholder. For example, the stakeholder said individuals may view children who engaged in sex acts in exchange for shelter as children who chose to be in their situation.
- One stakeholder said that some service providers do not understand common situations of children being trafficked. For example, a stakeholder said that some traffickers give children illicit substances to get children addicted and keep them in trafficking situations. However, providers may prohibit providing services to children with substance use issues.

These stakeholders discussed several ways that misperceptions of child trafficking might impede efforts to support child trafficking survivors. For example, one stakeholder said that the limited representation of child trafficking survivors in awareness materials leads to misinformation and potentially fewer services for children who are not represented in these materials. Additionally, the stakeholder said that because of misperceptions, some shelters for children experiencing homelessness hesitate to admit child trafficking survivors, fearing the possible recruitment of other children in the shelters into trafficking.

HHS also reported some challenges regarding education on preventing child trafficking that may contribute to public misperceptions. For example, HHS reported that one of its programs sometimes had difficulty obtaining school administration agreement to offer education on preventing child trafficking for educators and students. HHS reported that this is due in part to some school administrators’ reluctance to accept that child trafficking can occur within their communities. Additionally, over half of the 13 stakeholders reported that limited training for professionals who may interact with child trafficking survivors—such as teachers and law enforcement officials—makes it challenging to raise awareness. One stakeholder said teachers are generally not required to take training on child trafficking, making it difficult for them to identify and report potential cases.

What challenges exist in providing support to certain populations of child trafficking survivors?

Over half of the 13 stakeholders reported that there are generally not enough services for all child survivors, and that certain groups of children are particularly underserved. For instance, these stakeholders, as well as OTIP officials, said that boys and child labor trafficking survivors are underserved, among other groups (see fig. 2). OVC reported that in fiscal year 2023, all of its anti-trafficking notices of grant awards encourage applicants to propose responses to labor trafficking and indicate priority consideration for projects designed to support underserved populations.

Figure 2: Underserved Populations of Child Trafficking Survivors Identified by Selected Stakeholders



Boys

Over half of stakeholders said that boys are underserved. One stakeholder said that boys are less likely to identify themselves as trafficking survivors. Another stakeholder said that professionals in the field are less likely to view boys as trafficking survivors.



Child labor trafficking survivors

Over half of stakeholders said there is limited federal, state, or local focus on domestic child labor trafficking. Instead, stakeholders said that most public awareness efforts and supports for survivors focus on sex trafficking.



Other underserved populations

Over half of stakeholders said there are few programs and services that adequately support Black, American Indian, LGBTQ+, and foreign national children.

Source: GAO analysis of information provided by selected stakeholders; Photos (l-r) Roman Bodnarchuk/stock.adobe.com, artit/stock.adobe.com, melita/stock.adobe.com. | GAO-24-106038

Accessible Data for Figure 2: Underserved Populations of Child Trafficking Survivors Identified by Selected Stakeholders

- **Boys:** Over half of stakeholders said that boys are underserved. One stakeholder said that boys are less likely to identify themselves as trafficking survivors. Another stakeholder said that professionals in the field are less likely to view boys as trafficking survivors.
- **Child labor trafficking survivors:** Over half of stakeholders said there is limited federal, state, or local focus on domestic child labor trafficking. Instead, stakeholders said that most public awareness efforts and supports for survivors focus on sex trafficking.
- **Other underserved populations:** Over half of stakeholders said there are few programs and services that adequately support Black, American Indian, LGBTQ+, and foreign national children.

Source: GAO analysis of information provided by selected stakeholders; Photos (l-r) Roman Bodnarchuk/stock.adobe.com, artit/stock.adobe.com, melita/stock.adobe.com. | GAO-24-106038

One stakeholder said that service providers are less accustomed to serving boys living in the U.S. who experience labor trafficking that does not involve hard labor. As a result, these children may not be screened for trafficking. Additionally, because some programs do not meet the cultural or linguistic needs of children in underserved populations, these children are less likely to participate in the programs, according to another stakeholder.

What challenges exist related to supporting detained children?

Over half of the 13 stakeholders that we interviewed, as well as OVC officials, reported several challenges related to supporting child trafficking survivors who are detained by law enforcement. OVC officials reported that one challenge the office faces in meeting the needs of children who have been trafficked is that some state and local criminal justice systems do not identify them as victims, and instead penalize them for their trafficking experience. Consistent with the Trafficking Victims Protection Act of 2000, as amended, individuals involved in trafficking crimes should be treated as victims.¹² However, prior research has found differences in how children are treated by state and local criminal justice systems (see sidebar).¹³ The stakeholders that discussed challenges related to supports for children detained by law enforcement highlighted concerns about children’s access to services, among other issues. For example:

- Children in some jurisdictions may be placed in juvenile detention by local law enforcement for prostitution, theft, or other actions taken while they were trafficked, according to three stakeholders. When detained, these children may not receive the services they need to address their experience with trafficking, according to two of the stakeholders. One stakeholder reported that Black children make up the majority of prostitution arrests of individuals under age 18, and thus they may disproportionately experience detainment for these types of arrests.
- Two stakeholders said that in some trafficking cases, law enforcement officials place children in juvenile detention for their safety, and to prevent children from continuing to be trafficked. Supporting children who have been trafficked can be challenging because many children repeatedly return to their traffickers, according to two stakeholders. OTIP officials stated that some children return to their traffickers out of fear or necessity. Officials said this may be because traffickers sometimes provide emotional, financial, or other support that the children may not receive from other adults in their lives. Additionally, one stakeholder noted there is a shortage of safe places to take children who have been trafficked, aside from placing them in juvenile detention. As a result, these children often end up back on the streets, or in and out of hospitals, according to the stakeholder. However, three stakeholders said that confining children in juvenile detention can cause additional harm, such as increased trauma and exposure to violence. One of the stakeholders said that more focus is needed on getting these children access to appropriate services.

What other challenges exist related to raising public awareness of child trafficking and supporting survivors?

The 13 stakeholders that we interviewed, as well as DOJ and HHS officials, reported several other challenges related to raising public awareness of child trafficking and supporting survivors. These challenges include limited data and research on child trafficking, intensive treatment and care for child survivors, and limited resources to meet survivors’ needs.

Criminalization of Child Trafficking Survivors

While stakeholders we interviewed and prior research has found that children who experience human trafficking may be arrested in some states and localities, some jurisdictions have taken steps to end this approach. For example, some states have developed “Safe Harbor” laws and related policies. These laws and policies are intended to prevent children from being prosecuted for prostitution and related offenses and ensure that they receive needed services. Examples include:

- Prohibiting law enforcement from arresting, detaining, charging and prosecuting minors for prostitution offenses.
- Requiring law enforcement to direct child victims to specialized services and care.
- Using multidisciplinary teams in the investigation and prosecution of child trafficking, which in part provides treatment for and protection of the child.
- Prohibiting the criminalization of child sex trafficking victims for other crimes committed as a result of their victimization.

Source: GAO review of information from selected stakeholders, state laws, and the Congressional Research Service. | GAO-24-106038

Limited data, research, and evaluation

HHS and DOJ officials reported various challenges related to research and evaluation on efforts to address child trafficking. For example, HHS’s Office of Planning, Research, and Evaluation stated that one challenge it faces in its efforts to evaluate its Human Trafficking Youth Prevention Education Demonstration program relates to program implementation.¹⁴ Specifically, the

office reported that the program operates in school environments, and schools are facing challenges exacerbated by the COVID-19 pandemic, such as staffing shortages. As a result, the program may not be implemented as it was designed, making it more difficult to evaluate the effectiveness of the program, according to officials. Officials from DOJ's National Institute of Justice also reported challenges conducting evaluations of anti-trafficking programs for children.¹⁵ For example, the agency reported challenges assessing program effectiveness because it is common for child trafficking survivors to run away, move to a new area, or quit the program.

DOJ officials also reported challenges related to obtaining data on child trafficking. Specifically, DOJ officials stated that it is difficult to develop viable, national estimates of child trafficking. Officials said this is due to the hidden nature of child trafficking, as well as inconsistent data quality across geographic locations and types of labor and sex trafficking. Over half of the 13 stakeholders also said that limited data and research on child trafficking was a challenge. For example, one stakeholder said that underreporting of labor trafficking and trafficking of boys makes it difficult to focus public attention and raise awareness. Another stakeholder noted that data on child trafficking is crucial to identifying areas of need and informing funding decisions.

Limited research on what programs and practices are effective for serving child survivors also poses challenges, according to another stakeholder. Another stakeholder said that in the absence of research in this area, service providers could potentially be using practices that do not work, or that cause harm to survivors. Further, better understanding the outcomes of anti-trafficking programs for children could help agencies invest federal funds in efforts that are the most impactful for children, according to one stakeholder. DOJ stated that while it is funding research on efforts to address child trafficking, it will take time and resources to develop a strong body of research in this area.

While over half of the 13 stakeholders discussed the challenge of limited data and research, four stakeholders raised concerns about appropriately investing resources in this area. For example, these stakeholders noted that most service providers may not have the resources or capacity to assess their programs' effectiveness. One stakeholder suggested that investing in more services for survivors should be higher priority than improving data on the prevalence of child trafficking.

Intensive treatment and care for child survivors

OTIP officials noted that child survivors can have more intensive case-management needs than adults. For example, officials said that because children generally have less independence, they can require more assistance in navigating services for which they may be eligible. Children may also need more support and services because of the various forms of violence and abuse they may have suffered in addition to their human trafficking experience, according to officials.

Limited resources to meet survivors' needs

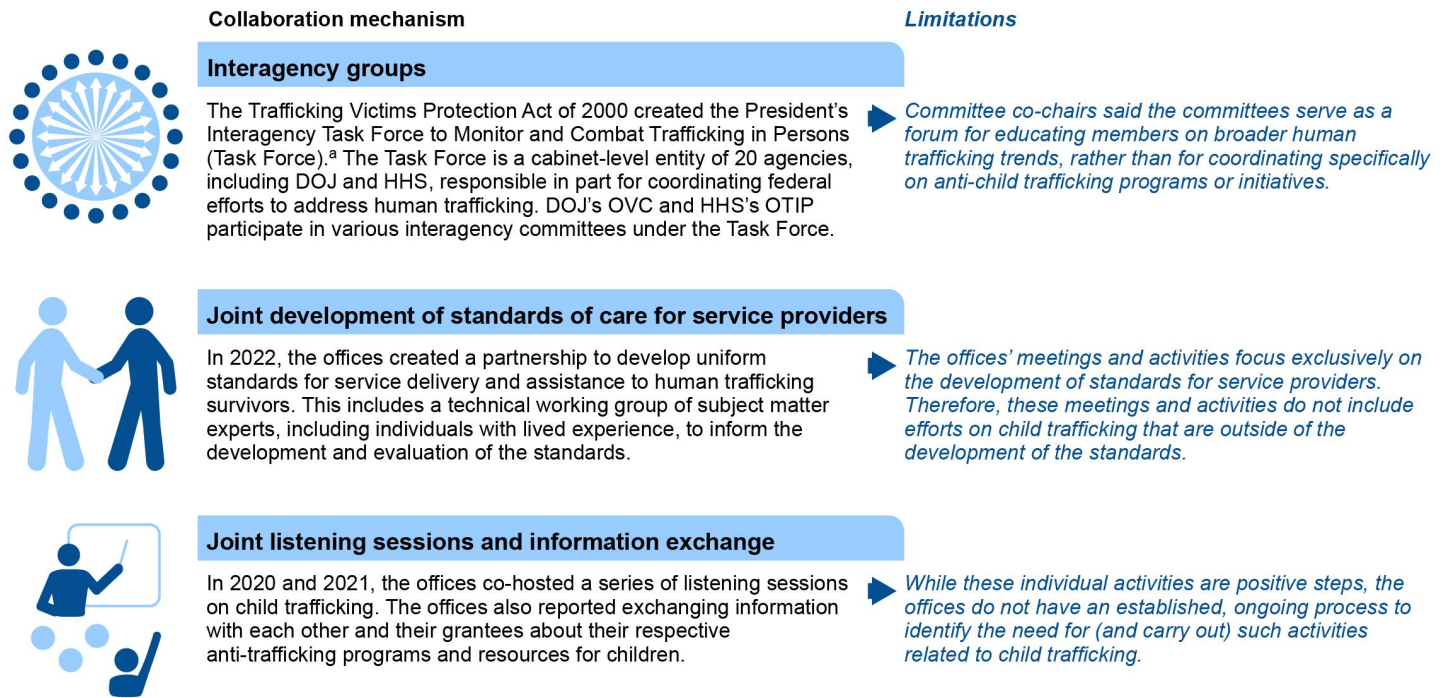
Over half of the stakeholders we spoke with said that insufficient funding and resources have created long waitlists for child survivors to access services, or gaps in services. Challenges securing sufficient housing for child trafficking survivors were also identified by over half of stakeholders. For example, one stakeholder said that some children may need housing in a new location to prevent them from continuing to be trafficked. However, the stakeholder said the children's new homes may not be close to their support systems or services, which makes accessing such supports more difficult. Another stakeholder also

highlighted gaps in services, particularly in rural areas. The stakeholder said that because of these gaps in services, children in rural communities may not have access to help.

How are OVC and OTIP collaborating to address child trafficking?

OVC and OTIP collaborate to help address human trafficking, but their collaboration mechanisms focus broadly on individuals of all ages who have experienced trafficking.¹⁶ While the offices collaborate on some child trafficking efforts on an ad hoc basis, they do not have a collaboration mechanism dedicated to child trafficking (see fig.3).¹⁷ An established collaboration mechanism that focuses on child trafficking, and follows leading collaboration practices, is critical to help resolve the unique challenges posed by this type of trafficking. These leading practices include defining common outcomes, clarifying roles and responsibilities, and identifying leadership, among other practices.¹⁸

Figure 3: OVC and OTIP Collaboration Mechanisms to Address Human Trafficking and Limitations Related to Children



Source: GAO analysis of information from OVC and OTIP; GAO (illustrations). | GAO-24-106038

Accessible Data for Figure 3: OVC and OTIP Collaboration Mechanisms to Address Human Trafficking and Limitations Related to Children

Category	Collaboration mechanism	Limitations
Interagency groups	The Trafficking Victims Protection Act of 2000 created the President's Interagency Task Force to Monitor and Combat Trafficking in Persons (Task Force). ^a The Task Force is a cabinet-level entity of 20 agencies, including DOJ and HHS, responsible in part for coordinating federal efforts to address human trafficking. DOJ's OVC and HHS's OTIP participate in various interagency committees under the Task Force.	Committee co-chairs said the committees serve as a forum for educating members on broader human trafficking trends, rather than for coordinating specifically on anti-child trafficking programs or initiatives.

Category	Collaboration mechanism	Limitations
Joint development of standards of care for service providers	In 2022, the offices created a partnership to develop uniform standards for service delivery and assistance to human trafficking survivors. This includes a technical working group of subject matter experts, including individuals with lived experience, to inform the development and evaluation of the standards.	The offices' meetings and activities focus exclusively on the development of standards for service providers. Therefore, these meetings and activities do not include efforts on child trafficking that are outside of the development of the standards.
Joint listening sessions and information exchange	In 2020 and 2021, the offices co-hosted a series of listening sessions on child trafficking. The offices also reported exchanging information with each other and their grantees about their respective anti-trafficking programs and resources for children.	While these individual activities are positive steps, the offices do not have an established, ongoing process to identify the need for (and carry out) such activities related to child trafficking.

Source: GAO analysis of information from OVC and OTIP; GAO (illustrations). | GAO-24-106038

Note: The Office for Victims of Crime (OVC) is within the Department of Justice (DOJ) and the Office on Trafficking in Persons (OTIP) is within the Department of Health and Human Services (HHS).

^aSee 22 U.S.C. § 7103. In addition to HHS and DOJ, the Task Force includes other agencies and offices, such as the Departments of Education, Labor, and State, and the Office of the Director of National Intelligence. See 22 U.S.C. § 7103(b).

According to officials from both offices, they do not have a collaboration mechanism dedicated specifically to children because they already have ongoing collaboration mechanisms to address human trafficking more broadly. Officials said these efforts include programs and issues related to children. Additionally, OTIP officials said that both offices collaborate on child trafficking cases and programming as situations and needs arise.

A collaboration mechanism dedicated specifically to children is important, however, because child trafficking survivors have distinct needs. For example, according to OVC officials, children's needs are different from adults' needs due to developmental differences, which may require specialized counseling to address. In addition, child trafficking survivors often require more time, attention, and resources than adult trafficking survivors, according to OTIP. These officials also said that recent increases in the number of children served by one of its programs for trafficking survivors of all ages, as well as the unique and longer-term needs of children, prompted the office to establish a new program focused solely on children.¹⁹ Further, as previously discussed, selected stakeholders and agency officials identified a number of challenges in raising public awareness and supporting survivors that are unique to children—such as public misperceptions about how children are trafficked, and what supports children need.

In 2021, the administration released its *National Action Plan to Combat Human Trafficking*, which includes priority actions specific to supporting coordination efforts to address child trafficking. The plan also emphasizes the importance of collaboration across government when investing resources in anti-trafficking efforts. Additionally, as previously mentioned, our prior work identified leading practices for implementing collaborative efforts.²⁰ Establishing a collaboration mechanism for efforts to address child trafficking, and applying these leading collaboration practices to help enhance and sustain these efforts, would better enable the offices to overcome challenges specific to children and meet the distinct needs of child trafficking survivors. This type of mechanism could also help manage any fragmentation of efforts to address child trafficking between OVC and OTIP and the potential for overlapping and duplicative efforts.²¹

How are OTIP and OVC measuring the performance of their anti-trafficking programs for children?

OTIP and OVC developed strategic goals to help measure the performance of their anti-trafficking programs focused on children but have not yet developed performance goals. We found that OTIP is taking positive steps to develop performance goals; however, OVC officials said they are not planning to develop such goals. According to leading practices for performance management, agencies should generally develop strategic and performance goals to help manage performance (see table 2 for descriptions and examples).²²

Table 2: Definitions and Examples of Key Performance Management Terms

Item	Description	Example
Strategic goal	Broad statement of what a program is to achieve.	Strengthen the nation’s housing market.
Performance goal	Objective and measurable statement of the level of performance an entity wants to achieve during a specific time frame. Ideally, this statement includes a target, a measure and a time frame.	Reduce average residential vacancy rates in 70% of neighborhoods hit hardest by crisis to comparable areas by September 2024.

Source: GAO analysis of Office of Management and Budget and GAO leading practices. | GAO-24-106038

As described above, we found that OTIP and OVC developed goals that help broadly state what each anti-trafficking program for children is intended to achieve (i.e., strategic goals). See table 3 for examples of these goals.

Table 3: Examples of Goals Established by the Department of Health and Human Services Office on Trafficking in Persons (OTIP) and the Department of Justice Office for Victims of Crime (OVC) for Their Fiscal Year 2022 Anti-Trafficking Programs for Children

Program (Agency)	Goal
Human Trafficking Youth Prevention Education Demonstration (OTIP)	Fund local schools to build the capacity of selected schools to provide skills-based human trafficking prevention education for educators, other staff, and students and to implement a Human Trafficking School Safety Protocol.
Aspire: Child Trafficking Victim Assistance Demonstration (OTIP)	Provide national coverage of services to foreign national children who have experienced severe forms of human trafficking.
Preventing Trafficking of Girls (OVC)	Develop or enhance prevention and early intervention services for girls who are at risk or are victims of sex trafficking.
Minor Victims of Sex Trafficking (OVC)	Develop, expand or strengthen victim services programs for minor victims of sex trafficking.

Source: GAO analysis of information from Department of Health and Human Services and Department of Justice grant solicitations. | GAO-24-106038

OTIP officials told us that they are actively working to establish performance goals for their two anti-trafficking programs for children, which are relatively new programs.²³ Specifically, OTIP is in the process of gathering data across multiple years to establish baselines that will help it set feasible performance goals for the future. OTIP officials said they will use the baseline data to ensure the performance goals are specific and measurable—a leading practice in defining the level of performance that a program aims to achieve.

On the other hand, OVC officials reported that they do not plan to establish performance goals because of various factors beyond their control. For example, OVC officials said that the volume of children served by their programs can vary significantly based on external factors, such as the extent of referrals from community partners. Additionally, OVC officials said that the types of services and length of services that children receive vary by the needs of each child. An emphasis on voluntary child participation also restricts their ability to set

performance goals, according to OVC officials. OVC officials stated that instead of setting performance goals, it collects and reviews aggregate data on the programs' activities, such as the number of children served, and the types of services provided.

Collecting aggregate data can provide useful information on a program's activities; however, leading practices encourage agencies to establish the desired results of those activities through performance goals.²⁴ While setting performance goals for programs that are influenced by external factors can be challenging, leading practices for performance management and our prior work have identified various strategies for doing so.²⁵ For example, an agency can potentially identify performance goals for activities over which it has varying levels of control. Also, an agency can potentially redefine the scope of a strategic goal, which could help focus related performance goals on a range of activities for which it has greater levels of control.²⁶ By establishing achievable performance goals that reflect leading practices for performance management (e.g., objective, measurable, and quantifiable, as appropriate), OVC could better define what its programs are trying to achieve. Additionally, taking this step would better position the office to understand its progress towards supporting child trafficking survivors.

How are DOJ and HHS measuring the effectiveness of their anti-trafficking programs for children?

As of August 2023, DOJ and HHS had some efforts underway to evaluate the effectiveness of anti-trafficking programs for children, including: (1) an evaluability assessment of OVC's Minor Victims of Sex Trafficking program, (2) a phased assessment of one anti-trafficking organization's implementation of OVC-funded programs for children, and (3) an ongoing evaluation of OTIP's Human Trafficking Youth Prevention Education Demonstration program.

- **Minor Victims of Sex Trafficking Program.** OVC is funding a readiness assessment to determine whether each funded project is ready for evaluation. The design and implementation of each evaluation will correspond with the project's readiness. The final evaluation report is expected by December 2025.
- **Preventing Trafficking of Girls Program and the Field-Generated Strategies to Address the Criminalization of Minor Victims of Sex Trafficking Program.**²⁷ DOJ's National Institute of Justice awarded grants in fiscal years 2020 and 2022 to study one OVC grantee's services for children, which are funded by these programs. One paper from the first grant, published in January 2023, provided qualitative information on the strategies used by the grantee to serve children. The next phase of this research, which involves an outcome evaluation to assess whether the grantee's services improved the well-being of children in its programs, is ongoing.
- **Human Trafficking Youth Prevention Education Demonstration Program.** OTIP and HHS's Office of Planning, Research, and Evaluation released two reports as part of the evaluation of its Human Trafficking Youth Prevention Education Demonstration program. The first evaluation, published in July 2022, assessed the program's implementation. The evaluation highlighted achievements and challenges that local education agencies faced, such as meeting the needs of vulnerable populations, addressing racial inequities, and mental health issues. The second evaluation, published in May 2023, found that local education agencies made progress in delivering prevention education. However, the evaluation identified challenges in

recruiting educators and obtaining parental permission to provide information on human trafficking to students.

Conclusions

Child trafficking is a devastating and sometimes misunderstood crime occurring in the U.S. OVC and OTIP collaborate to help raise public awareness of human trafficking and support survivors. However, these collaboration efforts focus broadly on individuals of all ages. Establishing a collaboration mechanism focused solely on efforts to combat child trafficking would better enable the offices to overcome challenges specific to children and meet the distinct needs of child survivors. Additionally, while OVC and OTIP are taking some steps to measure the success of their anti-trafficking programs for children, OVC's efforts would be improved by establishing performance goals for these programs. Doing so would better position OVC to define what its programs are trying to achieve, and provide better information about the progress made in combatting child trafficking.

Recommendations for Executive Action

The Attorney General should ensure that OVC, in coordination with OTIP, establishes a mechanism—aligned with leading collaboration practices—to guide the offices' collaboration efforts to combat child trafficking. (Recommendation 1)

The Secretary of Health and Human Services should ensure that OTIP, in coordination with OVC, establishes a mechanism—aligned with leading collaboration practices—to guide the offices' collaboration efforts to combat child trafficking. (Recommendation 2)

The Attorney General should ensure that OVC develops achievable performance goals for its anti-trafficking programs for children that reflect leading practices, such as being objective, measurable and quantifiable. (Recommendation 3)

Agency Comments

We provided a draft of this report to DOJ and HHS for review and comment. In their comments, reproduced in Appendices I and II, the departments concurred with our recommendations. DOJ and HHS noted that while they have some efforts to collaborate on child trafficking, they would take additional actions to address our first and second recommendations, including formalizing their collaborative efforts through a Memorandum of Agreement, and holding bi-monthly meetings specifically focused on the agencies' efforts to combat child trafficking. DOJ noted that it would address our third recommendation by analyzing its strategic goals and performance data for its anti-trafficking programs for children to establish performance goals. DOJ anticipates that these goals will be reflected in its fiscal year 2025 funding opportunities. DOJ and HHS also provided technical comments, which we incorporated as appropriate.

How GAO Did This Study

We conducted interviews with federal officials from DOJ, HHS, and the Departments of Education, Homeland Security, and Labor to obtain background information on the federal government's efforts to address child trafficking. We also met with the National Center for Missing & Exploited Children and Polaris, national nonprofit organizations working to prevent child victimization and end human trafficking, respectively.

We focused our work on DOJ's Office for Victims of Crime (OVC) and HHS's Office on Trafficking in Persons (OTIP), as these are the primary offices administering domestic anti-trafficking grant programs specifically for children. We asked these offices to identify programs targeting public awareness of child

trafficking and support for survivors that are children, funded from fiscal years 2020 through 2022. We corroborated the information the offices provided with online resources. We identified a total of four programs administered by OVC and two programs administered by OTIP that met our criteria. We did not examine programs not specifically directed at child trafficking, but which may serve or address children's needs as part of a broader effort.

For the OVC and OTIP programs we identified, we reviewed program documentation and obtained data on the number of grants awarded and funds distributed. We interviewed officials knowledgeable about the data's reliability and found the data to be sufficiently reliable to report on the number of grants awarded and funds awarded.

To identify potential challenges raising public awareness of child trafficking and supporting child trafficking survivors, we conducted interviews with 13 nongovernmental organizations with expertise in addressing child trafficking. These included nine organizations selected to reflect a range of experience in either raising public awareness of child trafficking, providing supports to child trafficking survivors, or conducting research, advocacy, or training and technical assistance related to these issues. We identified these organizations through online research and recommendations from agencies and organizations we held preliminary interviews with.

We also selected four organizations that received grants from OVC or OTIP. The four grantees we selected represented: (1) those with significant funding, (2) those operating in states that reported high numbers of potential trafficking incidents to the National Human Trafficking Hotline, and (3) those that previously received HHS or DOJ funding to combat human trafficking. Additionally, we interviewed and requested information from DOJ and HHS to obtain their perspectives on the challenges they face combatting child trafficking related to their programs that raise public awareness and support child trafficking survivors. While not generalizable, these interviews provided valuable context and insights into ongoing efforts to address these issues.

To assess collaboration between OVC and OTIP on their efforts to address child trafficking, we reviewed agency documentation (e.g., strategic planning documents), and conducted interviews and obtained written responses from both offices. We also obtained information from three federal interagency anti-human trafficking committees that OVC and OTIP participate in, to understand the extent to which the two offices collaborate on efforts to address child trafficking. These included committees focused on public awareness and outreach, victim services, and grant making—three areas relevant to our review.²⁸ We also reviewed leading practices from our prior work on interagency collaboration for insights on how OVC and OTIP may apply these practices in future efforts to collaborate.²⁹ To evaluate the goals that OVC and OTIP have set to monitor the performance of their anti-trafficking programs for children, we reviewed grant solicitations, and interviewed and obtained written responses from DOJ and HHS. We also reviewed leading practices for performance assessment to identify how the offices may improve their program goals.³⁰ Finally, we gathered information about the offices' efforts to assess program effectiveness through interviews with and documents from OVC, OTIP, DOJ's National Institute of Justice, and HHS' Office of Planning, Research and Evaluation.

We conducted this performance audit from June 2022 to December 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence

obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

List of Addressees

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
House of Representatives

The Honorable Burgess Owens
House of Representatives

GAO Contact Information

For more information, contact: Gretta L. Goodwin, Director, Homeland Security and Justice Issues, at (202) 512-8777 or goodwing@gao.gov or Kathryn A. Larin, Director, Education, Workforce, and Income Security Issues, at (202) 512-7215 or larink@gao.gov.

Chuck Young, Managing Director, Public Affairs, YoungC1@gao.gov, (202) 512-4800

A. Nicole Clowers, Managing Director, Congressional Relations, ClowersA@gao.gov, (202) 512-4400

Staff Acknowledgments: Jeffrey Fiore (Assistant Director), Elizabeth Sirois (Assistant Director), Aimee Elivert (Analyst-in-Charge), Sally Gilley, and Lerone Reid, along with Gergana Danailova-Trainor, David Dornisch, Richard Eiserman, Benjamin Licht, Lydie Loth, Samantha Lyew, Aaron Olszewski, Kevin Reeves, and Sarah Veale, made key contributions to this work.

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Appendix I: Comments from the Department of Justice



U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

November 16, 2023

Ms. Gretta Goodwin
Director
Homeland Security and Justice
Government Accountability Office
441 G Street, NW
Washington, DC 20548
VIA Electronic Mail at GoodwinG@gao.gov

Dear Ms. Goodwin:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, *Child Trafficking: Addressing Challenges to Public Awareness and Survivor Support (GAO-24-106038)*.

The Office for Victims of Crime (OVC), within the Office of Justice Programs (OJP), is the largest Federal funder of efforts to address human trafficking in the United States. In Fiscal Year (FY) 2023, OVC awarded over \$100 million to support efforts to identify survivors of sex and labor trafficking, connect them to high quality services, and bring their traffickers to justice. The majority of OVC's anti-trafficking funding supports direct service provision to human trafficking survivors of all ages. This includes crisis response, case management, housing, employment, education, physical and behavioral health, and legal services, among other activities. OVC also supports programming focused solely on child and youth survivors of trafficking. In FY 2023, OVC disseminated almost \$12 million under its Integrated Services for Minors Program which requires grantees to serve survivors of both sex and labor trafficking and provide a continuum of trauma-informed, culturally responsive, and gender responsive services. In addition, OVC disseminated approximately \$4.5 million under its Preventing Trafficking of Girls Program to support training and technical assistance, prevention, and early intervention services, and activities focused on girls who are at risk of, or are victims of, sex and/or labor trafficking.

The draft GAO report contains three Recommendations for Executive Action, two of which are directed to the Department of Justice. For ease of review, the two recommendations directed to the Department of Justice are restated below and followed by OJP's response.

- 1. The Attorney General should ensure that OVC, in coordination with OTIP, establishes a mechanism – aligned with leading collaboration practices – to guide the offices' collaboration efforts to combat child trafficking.**

The Office of Justice Programs accepts this recommendation. As the GAO draft report notes, the majority of Federal anti-trafficking funding supports programs that serve survivors of all ages, and OVC and the Office on Trafficking in Persons (OTIP) in the

Department of Health and Human Services have multiple existing collaboration mechanisms to coordinate on the cross-cutting issues that impact our programs. For example, OVC and OTIP currently collaborate and coordinate on each agencies' minor victims of human trafficking programs to improve coordinated and enhanced responses at the community level, such as OTIP's Aspire grant program; OVC's Integrated Services for Minor Victims of Trafficking program; and a new OVC FY 2024 forecasted program, the Pilot Program for Community Based Organizations in Underserved Communities to Build Capacity and Serve Adolescent and Youth Victims of Trafficking. In addition, OVC and OTIP coordinate on training and technical assistance for OVC and OTIP grantees serving minor victims of human trafficking.

However, to further enhance coordination and collaboration with OTIP, OVC will formalize our collaboration plans in a Memorandum of Agreement, which we anticipate executing by February 2024. Beginning in November 2023, OVC and OTIP will convene bi-monthly meetings specifically focused on our agencies' efforts to combat child and youth trafficking and to implement the GAO-identified collaboration practices that are appropriate, feasible, and nonduplicative of OVC and OTIP's established collaboration mechanisms. In addition, OVC will participate in OTIP's new National Advisory Committee on the Trafficking of Children and Youth in the U.S.

3. The Attorney General should ensure that OVC develops achievable performance goals for its anti-trafficking programs for children that reflect leading practices, such as being objective, measurable, and quantifiable.

The Office of Justice Programs accepts this recommendation. OVC agrees to implement performance goals that will not be harmful to child and youth survivors of trafficking receiving services through OVC programs. However, OVC opposes the development of performance goals tied directly to provision of services for the reason outlined in the GAO draft report, and, so as not to prioritize the *quantity* of services or individuals served over the *quality* of care of the survivor receives.

Currently, OVC does not impose time limits on services and encourages the provision of comprehensive services to ensure that child and youth survivors of trafficking have access to everything they need, for as long as they need it, to achieve the best possible outcome. OVC regularly receives feedback from grantees and stakeholders that they value this flexibility because it allows them to devote adequate resources to an individual client without the concern of meeting arbitrary service provision benchmarks. In consultation with anti-trafficking stakeholders, by July 2024, OVC's Human Trafficking Division and the OVC Performance Measures Coordinator will analyze strategic goals and performance data to establish performance goals for its child-serving anti-trafficking programs. OVC anticipates that these performance goals will be reflected in OVC's FY 2025 funding opportunities focused on anti-trafficking programs for children.

If you have any questions regarding this response, you or your staff may contact Jeffery Haley, Deputy Director, Audit and Review Division, Office of Audit, Assessment, and Management, at (202) 616-2936.

Sincerely,



Amy L. Solomon
Assistant Attorney General

cc: Jolene Ann Lauria
Acting Assistant Attorney General for Administration
U.S. Department of Justice

Bradley Weinsheimer
Associate Deputy Attorney General
Office of the Deputy Attorney General

Brent J. Cohen
Acting Principal Deputy Assistant Attorney General

Maureen A. Henneberg
Deputy Assistant Attorney General

Kristina Rose
Director
Office for Victims of Crime

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Jeffery Haley
Deputy Director, Audit and Review Division
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Rachel Johnson
Chief Financial Officer
Officer of the Chief Financial Officer

Louise Duhamel
Assistant Director, Audit Liaison Group
Internal Review and Evaluation Office
Justice Management Division

OJP Executive Secretariat
Control Number OCOM 000620

Accessible Data for Appendix I: Comments from the Department of Justice

November 16, 2023

Ms. Gretta Goodwin
Director
Homeland Security and Justice
Government Accountability Office
441 G Street, NW
Washington, DC 20548
VIA Electronic Mail at GoodwinG@gao.gov

Dear Ms. Goodwin:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, *Child Trafficking: Addressing Challenges to Public Awareness and Survivor Support* (GAO-24-106038).

The Office for Victims of Crime (OVC), within the Office of Justice Programs (OJP), is the largest Federal funder of efforts to address human trafficking in the United States. In Fiscal Year (FY) 2023, OVC awarded over \$100 million to support efforts to identify survivors of sex and labor trafficking, connect them to high quality services, and bring their traffickers to justice. The majority of OVC's anti-trafficking funding supports direct service provision to human trafficking survivors of all ages. This includes crisis response, case management, housing, employment, education, physical and behavioral health, and legal services, among other activities. OVC also supports programming focused solely on child and youth survivors of trafficking. In FY 2023, OVC disseminated almost \$12 million under its Integrated Services for Minors Program which requires grantees to serve survivors of both sex and labor trafficking and provide a continuum of trauma-informed, culturally responsive, and gender responsive services. In addition, OVC disseminated approximately \$4.5 million under its Preventing Trafficking of Girls Program to support training and technical assistance, prevention, and early intervention services, and activities focused on girls who are at risk of, or are victims of, sex and/or labor trafficking.

The draft GAO report contains three Recommendations for Executive Action, two of which are directed to the Department of Justice. For ease of review, the two recommendations directed to the Department of Justice are restated below and followed by OJP's response.

1. The Attorney General should ensure that OVC, in coordination with OTIP, establishes a mechanism – aligned with leading collaboration practices – to guide the offices' collaboration efforts to combat child trafficking.

The Office of Justice Programs accepts this recommendation. As the GAO draft report notes, the majority of Federal anti-trafficking funding supports programs that serve survivors of all ages, and OVC and the Office on Trafficking in Persons (OTIP) in the Department of Health and Human Services have multiple existing collaboration mechanisms to coordinate on the cross-cutting issues that impact our programs. For example, OVC and OTIP currently collaborate and coordinate on each agencies' minor victims of human trafficking programs to improve coordinated and enhanced responses at the community level, such as OTIP's Aspire grant program; OVC's Integrated Services for Minor Victims of Trafficking program; and a new OVC FY 2024 forecasted program, the Pilot Program for Community Based Organizations in Underserved Communities to Build Capacity

and Serve Adolescent and Youth Victims of Trafficking. In addition, OVC and OTIP coordinate on training and technical assistance for OVC and OTIP grantees serving minor victims of human trafficking.

However, to further enhance coordination and collaboration with OTIP, OVC will formalize our collaboration plans in a Memorandum of Agreement, which we anticipate executing by February 2024. Beginning in November 2023, OVC and OTIP will convene bi-monthly meetings specifically focused on our agencies' efforts to combat child and youth trafficking and to implement the GAO-identified collaboration practices that are appropriate, feasible, and nonduplicative of OVC and OTIP's established collaboration mechanisms. In addition, OVC will participate in OTIP's new National Advisory Committee on the Trafficking of Children and Youth in the U.S.

3. The Attorney General should ensure that OVC develops achievable performance goals for its anti-trafficking programs for children that reflect leading practices, such as being objective, measurable, and quantifiable.

The Office of Justice Programs accepts this recommendation. OVC agrees to implement performance goals that will not be harmful to child and youth survivors of trafficking receiving services through OVC programs. However, OVC opposes the development of performance goals tied directly to provision of services for the reason outlined in the GAO draft report, and, so as not to prioritize the quantity of services or individuals served over the quality of care of the survivor receives.

Currently, OVC does not impose time limits on services and encourages the provision of comprehensive services to ensure that child and youth survivors of trafficking have access to everything they need, for as long as they need it, to achieve the best possible outcome. OVC regularly receives feedback from grantees and stakeholders that they value this flexibility because it allows them to devote adequate resources to an individual client without the concern of meeting arbitrary service provision benchmarks. In consultation with anti-trafficking stakeholders, by July 2024, OVC's Human Trafficking Division and the OVC Performance Measures Coordinator will analyze strategic goals and performance data to establish performance goals for its child-serving anti-trafficking programs. OVC anticipates that these performance goals will be reflected in OVC's FY 2025 funding opportunities focused on anti-trafficking programs for children.

If you have any questions regarding this response, you or your staff may contact Jeffery Haley, Deputy Director, Audit and Review Division, Office of Audit, Assessment, and Management, at (202) 616-2936.

Sincerely,

Amy L. Solomon
Assistant Attorney General

cc:

Jolene Ann Lauria
Acting Assistant Attorney General for Administration
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Control Number OCOM 000620

Appendix II: Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation
Washington, DC 20201

November 9, 2023

Gretta L. Goodwin
Director, Homeland Security and Justice Issues
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Kathryn A. Larin
Director, Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Ms. Goodwin and Ms. Larin:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, **"Child Trafficking: Addressing Challenges to Public Awareness and Survivor Support" (GAO-24-106038)**.

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Melanie Anne Egorin

Melanie Anne Egorin, PhD
Assistant Secretary for Legislation

Attachment

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED – CHILD TRAFFICKING: ADDRESSING CHALLENGES TO PUBLIC AWARENESS AND SURVIVOR SUPPORT (GAO-24-106038)

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

Recommendation 2

The Secretary of Health and Human Services should ensure that OTIP, in coordination with OVC, establishes a mechanism—aligned with leading collaboration practices—to guide the offices' collaboration efforts to combat child trafficking.

HHS Response

HHS concurs with GAO's recommendation.

We especially appreciate the acknowledgement of existing OTIP efforts to prevent and respond to the trafficking of minors. However, HHS would like to clarify for the record that HHS and DOJ coordinate on child trafficking issues on a regularly and ad hoc basis, as required by statute and as needed. Pursuant to the Senior Policy Operating Group (SPOG) both agencies address child trafficking issues and programs during monthly and quarterly committee and subcommittee meetings. This includes the grantmaking, the public awareness and outreach, and the victim services committees. Co-chairs of these committees meet monthly. These engagements allow each agency to identify unmet needs, unserved and underserved communities, and plan and coordinate activities, including efforts to address the concerns of the trafficking of minors.

HHS also regularly communicates with DOJ about foreign national minors in the United States who have experienced human trafficking for the purposes of determining eligibility for public benefits and services such as case management services, medical services, food assistance, cash assistance, health insurance, and other needs to the same extent as a refugee. If information obtained during the Child Eligibility process indicates that a child *may have been* experienced human trafficking, HHS will issue an Interim Assistance Letter, making the child eligible to apply for benefits and services to the same extent as a refugee for up to 90 days (or 120 days, if extended). During this interim assistance period, HHS is statutorily required through the TVPA to seek consultation from DOJ, DHS, and non-governmental organizations before issuing an Eligibility Letter or a Denial Letter. In FY22 and FY23 OTIP sought consultation from DOJ on approximately 500 to 600 Interim Assistance cases each year.

HHS and DOJ have also collaborated on the development and dissemination of several resources to increase awareness and educate the public about child trafficking. For instance, HHS reviewed and provided input on a DOJ published graphic novel for children who have experienced human trafficking. HHS seeks DOJ's input on a regular basis on the development of messaging and imagery for the revamp of its Look Beneath the Surface public awareness campaign. Additionally, HHS and DOJ convene an annual meeting to discuss strategic plans for the developing new programs and resources to assist adult and minor victims of human trafficking. These meetings are intended to identify priorities, exchange information and ideas, and agree upon funded activities that will allow each agency to maximize resources and avoid duplication of efforts.

Proposed Actions

In response to the GAO recommendation, HHS consulted with DOJ to identify opportunities to formalize existing and identify new collaborative efforts. We agreed to integrate leading collaboration practices, in a Memorandum of Agreement (MOA). We anticipate the MOA will be fully executed by February 2024. However, there are several immediate actions the agencies have initiated which will be incorporated in the MOA:

- Convene regularly scheduled bi-monthly meetings specifically focused on our agencies' efforts to combat child and youth trafficking. (Effective November 2023)
- Engage OVC in the newly reconstituted National Advisory Committee on the Trafficking of Children and Youth in the U.S. (effective November 2023)
- Seek subject matter expertise from OVC on the development of new materials and messaging for the HHS Look Beneath the Surface public awareness campaign with the goal of increasing public awareness of trafficking of minors and dispelling misperceptions of who and how traffickers target children.
- Identify opportunities to improve coordination and build capacity of grant program services and assistance focused on minors who have experienced or at-risk for sex trafficking or labor trafficking in underserved communities.
- Coordinate on the development and dissemination of training and technical assistance for grant recipients serving minor victims of human trafficking.

Accessible Data for Appendix II: Comments from the Department of Health and Human Services

November 9, 2023

Gretta L. Goodwin
Director, Homeland Security and Justice Issues
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Kathryn A. Larin
Director, Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

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The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Melanie Anne Egorin, PhD
Assistant Secretary for Legislation

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GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED – CHILD TRAFFICKING: ADDRESSING CHALLENGES TO PUBLIC AWARENESS AND SURVIVOR SUPPORT (GAO-24-106038)

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- Identify opportunities to improve coordination and build capacity of grant program services and assistance focused on minors who have experienced or at-risk for sex trafficking or labor trafficking in underserved communities.
- Coordinate on the development and dissemination of training and technical assistance for grant recipients serving minor victims of human trafficking.

Endnotes

¹Lisa Fedina, Celia Williamson, and Tasha Perdue, “Risk Factors for Domestic Child Sex Trafficking in the United States,” *Journal of Interpersonal Violence*, vol. 34, no. 13 (2019): 2653–2673. For the purposes of this report, we generally use the term “survivor” rather than “victim” to refer to children who have experienced human trafficking. However, some people choose to embrace the title “survivor,” while others do not, and the terminology reflecting those who have experienced trafficking continues to evolve. We occasionally use the term “victim” when the term is used in relevant legislation or federal programming.

²A single incident can include multiple victims. Children involved in these incidents were under age 18 and living in the U.S.

³Federal law penalizes sex trafficking of children, which are individuals under age 18. See 18 U.S.C. § 1591(a). While federal law distinguishes between sex trafficking of individuals under age 18 and individuals 18 years and older, no such distinction exists for labor trafficking. Compare 18 U.S.C. § 1591(a), 22 U.S.C. § 7102(11)(A), (12) (sex trafficking) with 18 U.S.C. § 1590(a), 22 U.S.C. § 7102(11)(B) (labor trafficking). However, some efforts to combat child trafficking may include older teens (ages 18 and 19) and young people in their early twenties who experienced trafficking when they were minors. In our interviews for this report, we took a broad approach to what we considered “children” and asked questions about supports for young people both under and over age 18, in an effort to provide a fulsome review. As a result, some perspectives on efforts to address child trafficking that we discuss later in this report may include youth over age 18.

⁴See generally 22 U.S.C. § 7102(4), (11)(A), (11)(B), (12). Section 7102(11) sets forth definitions for purposes of identifying individuals as victims of severe forms of trafficking who are eligible for legal protections and services. However, criminal anti-trafficking statutes, 18 U.S.C. §§ 1581-1597, set forth narrower definitions for purposes of criminal enforcement of labor trafficking. Because this report focuses on victim protections and services rather than criminal enforcement, we generally apply the broader victim definitions under § 7102(11).

⁵We previously reported on federal efforts to combat online exploitation of children. For more information, see GAO, *Online Exploitation of Children: Department of Justice Leadership and Updated National Strategy Needed to Address Challenges*, GAO-23-105260 (Washington, D.C.: Dec. 14, 2022).

⁶Numerous legislative actions have established programs and initiatives related to human trafficking more broadly. We previously reported on legislative actions taken to help combat human trafficking. See GAO, *Human Trafficking: Actions Taken to Implement Related Statutory Provisions*, GAO-16-528R (Washington, D.C.: May 26, 2016).

⁷OVC and OTIP also fund human trafficking grant programs that serve survivors of all ages. We previously identified 42 grant programs for which DOJ and HHS awarded funding in 2014 and 2015 to combat human trafficking or assist victims. For more information, see GAO, *Human Trafficking: Agencies Have Taken Steps to Assess Prevalence, Address Victim Issues, and Avoid Grant Duplication*, GAO-16-555 (Washington, D.C.: June 28, 2016). Additionally, other federal entities fund efforts to combat human trafficking more broadly.

⁸Both offices fund other programs and initiatives that, in part, address child trafficking. For example, OTIP funded additional grant programs that served both children and adults in fiscal year 2022. However, we excluded these programs and other federal efforts from our overview of grant programs specific to child trafficking and where we discuss program performance goals because they serve a broader population of survivors, or they did not focus specifically on raising public awareness of child trafficking or providing services to children.

⁹OTIP funded multiple cohorts of grant recipients under this program. Specifically, OTIP awarded approximately \$10.6 million in grant funds to its first cohort of eight school districts over fiscal years 2020, 2021, and 2022 to implement the program. These districts are located in California, Georgia, Michigan, New York, Texas, and Utah. Fiscal year 2020 awards were for a 36-month project period. OTIP also awarded approximately \$1.5 million in grant funds to its second cohort of three school districts in fiscal year 2022. The second cohort included districts in Nebraska, New York, and Texas. Fiscal year 2022 awards were for a 60-month project period.

¹⁰We asked these stakeholders what challenges exist to raising public awareness and supporting survivors. The stakeholders identified misperceptions as a challenge, as well as other challenges, which we discuss later in this report. When responding to questions about public awareness, stakeholders provided some examples about professionals that may have more direct involvement in addressing child trafficking than the general public, such as law enforcement officials, teachers, service providers, etc. For the purposes of our report, we include these examples in our discussion of challenges raising awareness among the general public.

¹¹Four of the thirteen stakeholders we interviewed also received grants under the OVC and OTIP anti-trafficking programs for children that we identified.

¹²See generally Pub. L. No. 106-386, div. A, § 102(b)(19), (24), 114 Stat. 1464, 1468-69 (codified at 22 U.S.C. § 7101(b)(19), (24)).

¹³For more information see Congressional Research Service, *Juvenile Victims of Domestic Sex Trafficking: Juvenile Justice Issues*, R43677 (Washington, D.C.: August 5, 2014).

¹⁴HHS's Office of Planning, Research, and Evaluation studies the department's Administration for Children and Families programs, and the populations those programs serve, through research and evaluation projects.

¹⁵DOJ's National Institute of Justice is the research, development, and evaluation agency of the department.

¹⁶Our review of OVC and OTIP's collaboration on efforts to address child trafficking included the offices' efforts related to the six anti-child trafficking programs we identified, as well as other activities and initiatives the offices have related to children.

¹⁷While we focused our review on collaboration between OVC and OTIP to address child trafficking, the two offices have various other collaborative efforts to address human trafficking more broadly. Some of these efforts include state and local entities, and other key stakeholders.

¹⁸See GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, GAO-23-105520 (Washington, D.C.: May 24, 2023).

¹⁹The program referred to is OTIP's Trafficking Victim Assistance Program, which funds case management services for victims.

²⁰GAO-23-105520.

²¹Fragmentation refers to circumstances in which more than one federal agency (or organization within an agency) is involved in the same activity or broad area, and opportunities exist to improve implementation of that activity. For more information, see GAO, *2023 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Billions of Dollars in Financial Benefits*, GAO-23-106089 (Washington, D.C.: June 14, 2023).

²²See GAO, *Taxpayer Service: IRS Could Improve the Taxpayer Experience by Using Better Service Performance Measures*, GAO-20-656 (Washington, D.C.: Sept. 23, 2020) and OMB, Circular A-11, *Preparation, Submission and Execution of the Budget* (August 2023), which implements in part sections of the Government Performance and Results Act Modernization Act (GPRAMA). Although GPRAMA is applicable to the department or agency level, (e.g., DOJ), we have previously reported that GPRAMA can provide leading practices for use at the program level. See, e.g., GAO, *Juvenile Justice Grants: DOJ Should Take Additional Actions to Strengthen Performance and Fraud Risk Management*, GAO-20-202 (Washington, D.C.: Dec. 18, 2019).

²³OTIP made initial awards in fiscal year 2020 (Human Trafficking Youth Prevention Education Demonstration program) and fiscal year 2022 (Aspire: Child Trafficking Victim Assistance Demonstration program), respectively.

²⁴See OMB, Circular A-11; and GAO, *Telecommunications: FCC Should Enhance Performance Goals and Measures for Its Program to Support Broadband Service in High-Cost Areas*, GAO-21-24 (Washington, D.C.: Oct. 1, 2020).

²⁵See OMB, Circular A-11. For examples from our prior work, see GAO, *Managing for Results: Measuring Program Results that are Under Limited Federal Control*, GAO/GGD-99-16 (Washington, D.C. Dec. 11, 1998). In addition, GPRAMA at the department or agency level requires performance goals to be expressed in an objective, quantifiable, and measurable form unless agencies in consultation with OMB determine that it is not feasible. In such cases an "alternative form" performance goal may be used. Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3869-70 (codified as amended at 31 U.S.C. § 1115(c)).

²⁶Other strategies include disaggregating goals for distinct target populations for which the agency has different expectations, or using data on external factors to statistically adjust for their effect on the program's results.

²⁷As noted above in table 1, in fiscal year 2022, OVC created the Field-Generated Strategies to Address the Criminalization of Minor Victims of Sex Trafficking Program as an extension of the Minor Victims of Sex Trafficking Program.

²⁸These interagency committees are intended to advance the substantive work of the President's Interagency Task Force to Monitor and Combat Trafficking in Persons (PITF). The PITF is a

cabinet-level entity created by the TVPA, Pub. L. No. 106-386, div. A, § 105, 114 Stat. 1464, 1473 (codified as amended at 22 U.S.C. § 7103).

²⁹See GAO-23-105520.

³⁰See OMB, Circular A-11 and, for example, GAO/GGD-99-16.