Evaluation of Domestic Human Trafficking Demonstration Projects

Supporting Statement A

New Collection

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Office of Planning, Research, and Evaluation

Administration for Children and Families

U.S. Department of Health and Human Services

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A.   JUSTIFICATION

A.1   Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for data collection as a component of a 2-year evaluation of three demonstration programs funded in fiscal year (FY) 2015 to serve domestic victims of sex and labor trafficking. To monitor the programs' grant implementation and activities, the evaluation team (RTI International) will collect data during two site visits to each of the three demonstration sites, as well as Bimonthly Telephone Interviews with each Project Director every 2 months.

A.1.1   Study Background

The ACF Family and Youth Services Bureau (FYSB) issued a funding opportunity announcement in FY 2015 for demonstration projects to provide coordinated case management and comprehensive services to domestic trafficking victims. Three demonstration sites were funded in FY 2015: Multnomah County Domestic Victims of Human Trafficking Program, Oregon; Mountain Plains Youth Services, Minnesota and North Dakota; and Tumbleweed Runaway Program, Montana.

This exploratory study will describe program operations and implementation experiences as the programs identify, engage, and serve trafficking victims and build community capacity to address trafficking. To understand the demonstration sites' operations and experiences, the evaluation team at RTI must collect data directly from those with relevant knowledge—specifically, case managers, project directors, program partners, and program clients. The evaluation design focuses on the content and delivery of case management services, other services provided to program clients, and measures of client progress toward proximal outcomes; client perspectives; and a broad assessment of partnership composition and functioning. The information collected from the evaluation will provide guidance for ongoing program improvement to FYSB grantees, and will inform future program development and evaluation with the goal of improving identification and service delivery to domestic victims of sex and labor trafficking.

In 2000, Congress passed, and the President signed into law, the Trafficking Victims Protection Act (TVPA) of 2000 (22 U.S.C. §7101 et. seq.), which was amended by the Trafficking Victims Protection Reauthorization Act of 2003 and again amended in 2005, 2008, and 2013. The TVPA addresses domestic human trafficking and seeks to combat "severe forms" of human trafficking by punishing traffickers, protecting victims, and mobilizing U.S. government agencies to wage a global anti-trafficking campaign. In 2013, the President's Interagency Task Force to Monitor and Combat Trafficking in Persons developed the *Federal Strategic Action Plan (SAP) on Services for Victims of Human Trafficking in the United States* to amplify the federal response to human trafficking.

Estimates of the extent of domestic human trafficking range from 20,000 to 3 million victims in the United States, although prevalence estimates are plagued with problems of small sample sizes, single-area studies, and dependence on service providers to identify trafficking victims.[1,2] A broad review of literature on human trafficking in the United States concluded that most of what is known focuses on international sex trafficking, with much less attention to domestic trafficking.[3] Research also focuses largely on sex trafficking and, within sex trafficking, on females, particularly child victims. However, advocates have estimated that boys may be exploited in numbers nearly equal to girls.Error: Reference source not found[4]

Available evidence on the extent of domestic labor trafficking is largely anecdotal, with little systematic research on its prevalence and nature. Risk factors for human trafficking include childhood victimization (child abuse or neglect, dating violence, or rape), homelessness and running away, and drug abuse.[5,6] The impact of trafficking on its victims is pervasive and long lasting, and victims' trauma is partly the result of the everyday violence they face. Pimp-related violence is the most well-known, although violence comes from other sources as well, including customers, others working for the pimp, the public, and law enforcement.[7,8] Violence is also common among labor victims, against whom job managers and "bosses" may use violence to keep victims working. Sexually exploited or trafficked youth are at substantial risk of sexually transmitted diseases, including HIV/AIDS. The social and emotional risks are also significant, with studies reporting disproportionate levels of mental illness.[9]

The need to better understand provision of services is great. Service delivery is made more difficult by the hidden nature of the crime when victims are runaways or homeless; are identified as prostitutes; are not recognized as being trafficked; or do not disclose their exploitation because of fear of their exploiter, shame, or embarrassment.[10] Many of the service needs that have been identified for trafficking victims emerged from work with vulnerable populations most likely to be trafficked. The ACF-funded demonstration sites will implement a comprehensive victim-centered services model, using trauma-informed approaches. These principles complement ACF's requirement that demonstration sites utilize comprehensive case management and develop a collaborative approach to the provision of services that may include runaway and homeless youth service providers, child welfare staff, law enforcement, juvenile and adult corrections, courts, schools, medical and mental health professionals, child advocacy centers, legal advocates, victim services professionals, and community- and faith-based organizations.

A.1.2 Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A.2   Purpose of Survey and Data Collection Procedures

A.2.1   Overview of Purpose and Approach

The purpose of this study is to conduct a 2-year evaluation of demonstration programs funded in FY 2015 to serve domestic victims of sex and labor trafficking. The evaluation will describe program operations and implementation experiences as the three selected programs identify, engage, and serve trafficking victims and build community capacity to address trafficking. Information from the evaluation will inform development and evaluation of future programs to address domestic trafficking, and will provide information for ongoing program improvement to FYSB grantees.

This evaluation explores four domains within the demonstration programs: community and organizational capacity; partnership composition and functioning; comprehensive victim-centered services; and survivor characteristics, experiences, and early outcomes. Specific evaluation questions have been developed to address each of these domains (see **A.2.2**). A detailed description of the study design and data collection methodology can be found in section **A.2.3.**

A.2.2   Research Questions

Evaluation questions are grouped under four separate domains: community and organizational capacity; partnership composition and functioning; comprehensive victim-centered services; and survivor characteristics, experiences, and early outcomes. These domains provide valuable insight in the multi-dimensional nature of human trafficking and provision of services to those affected by it. A table with all evaluation questions for each research domain can be found in **Table A.2.1.**

Table A.2.1.   Research Questions

Research Questions

Community Needs Assessment

1. To what extent do grantees utilize the community needs assessment to ensure that the right partners are involved, appropriate services are available and accessible, and resources are allocated appropriately?

Partnership Expansion

2. What networks and service linkages have been created to provide assistance to victims of trafficking? What are the key factors that facilitated or impeded the collaboration and coordination of services?

3. What is the nature and quality of the collaborations that were formed among providers of assistance to victims? What is necessary for these collaborations to form? What is necessary to sustain the collaborations?

4. How does collaboration among the providers of victim services influence referral mechanisms? What aspects of coordination among providers influence successful referrals?

5. How has the grantee conducted community outreach to engage diverse partners?

Comprehensive Victim-Centered Services

6. What does the case management component look like? What is the program model?

7. What information can be shared across agencies?

8. What are protocols for release of information? What do service providers and clients think is appropriate to share?

9. How do providers utilize screening tools and assessments in their case management protocols? To what extent are case management services victim-centered?

10. What services are provided, and what do they look like? How are the services delivered? To what extent are the services comprehensive?

11. What have been service providers' and clients' experiences with the program? What do they see as working well? What do they see as not working?

12. To what extent are victims of trafficking who are otherwise ineligible for federally funded services provided with needed services?

Survivor Experiences and Outcomes

13. What are the characteristics of the clients served through the program? What were their trafficking experiences? How were they identified as trafficking victims? To what extent have clients previously interacted with human services programs or the child welfare system?

14. What types of supports do clients most want? To what extent do clients access the services that best meet their needs? What needs are difficult to meet?

15. To what extent do clients make progress toward their individual goals?

16. To what extent do clients make progress toward appropriate, short-term indicators of health, safety, and well-being?

Cost

17. What are the costs associated with the case management component? What are the costs associated with ensuring that victims receive the services that are needed and available?

18. What are the costs associated with providing needed services that would otherwise be unavailable in the community?

A.2.3   Study Design

Data Collection

Each year of the grantee program, the evaluation team will collect qualitative data via key informant interviews with grantee and partner agency staff, case narrative interviews with case managers, interviews with clients, informal observations of grantee and partner team meetings, and review of documents supplied by grantees (e.g., screening and assessment tools, information sharing protocols, needs assessments) (see **Table A.2.2**). Together, these methods will assist in answering the evaluation questions and measuring demonstration program progress.

The RTI evaluation team will collect data during two site visits, one in summer of 2016 and one in summer of 2017, to each of the three demonstration sites. During the site visits, evaluation team members will conduct key informant interviews with project directors, case managers, and key community partners; and conduct case narrative interviews with case managers. Prior to each interview, interviewers will explain to respondents that participating the interview is completely voluntary and that they may decline to answer any question or stop the interview at any time (see introductory text in Appendixes A-1 through A-5).

In addition to interviews conducted during site visits, RTI will arrange a call with each grantee every 2 months. During these calls, RTI will ask project directors or their designees about any significant program developments (e.g., updates or changes related to program structure, partnerships, or service delivery), and review questions that may have arisen from document review activities. RTI will also request and review program documents and materials, such as funding applications, memoranda of understanding, screening and assessment tools, information sharing protocols, and training materials. Additionally, one telephone interview with each grantee project director and/or finance staff will be conducted to collect information about program cost over a 12-month period.

Interview guides for each of the key informant interviews are included in **Appendix A-1 through A-7**, and are briefly described in **Section A.2.4.** Additional items for this study were developed by the evaluation team to address the specific evaluation questions identified in **Section A.2.3**.

Data Analysis

Analysis of qualitative data (key informant interviews, case narrative interviews, client interviews, or data abstracted during review of site documents) will begin with the development of *deductive codes,* which will represent topics addressed within the topic guides (e.g., client engagement in the service delivery process). The task team will create a detailed codebook with definitions. To facilitate analysis, data will be abstracted into a qualitative data management program (NVivo). As interview notes are reviewed and coded, team members will also identify issues, facts, or topics that were not anticipated

but are potentially significant to what is being described. Examples of such *inductive codes* might include specific concerns related to client dependency, mechanisms of gang involvement in trafficking, or specific barriers to and facilitators of collaboration. Two team members will each separately code a sample of interview notes from the first site visit and compare their coding decisions to identify any possible ambiguities that require clarification before coding proceeds. As coding proceeds, the team will abstract information from the notes into the database and continually review the inductive codes to ascertain which merit inclusion in the existing coding structure. The inductive codes will be added to the database and populated with data as they are identified during review. Following completion of deductive coding of all interview notes, the notes will be reviewed a second time to identify additional instances to which the inductive codes might apply. This method has been widely used by RTI researchers in situations requiring cost-efficient handling of qualitative data for evaluation rather than ethnography. RTI will then prepare matrices that summarize themes across sites or by types of respondents to develop a broad perspective of potential patterns. In addition, they will triangulate data by comparing qualitative data from different sites, sources, or site visits.

Limitations and Strengths

This study is grounded in a process evaluation design, which focuses on individual programs of service provision and client needs. Because the collected data will be inherently grantee- and program-specific, we cannot generalize our findings to other service providers or other individuals affected by domestic human trafficking.

Nevertheless, the proposed research approach will allow a deep understanding of the clients' service needs and the case management model of the three grantees, which is an important starting point for determining how to best serve a diverse population of victims. Qualitative interviews with case managers, program directors, and clients will add unique, nuanced voices to this complex topic. This study will serve as a preliminary exploration of these issues and present an opportunity for future research to pursue this work on a larger, more representative scale.

A.2.4 Universe of Data Collection Efforts

Table A.2.2 lists all data collection activities by the title used to describe the instrument throughout the entire package (which matches the file name of the instrument document) and in the same order as they are listed in the burden table in A.12. All instruments can be found in **Appendix A-1 through A-7.**

Table A.2.3 includes a cross-walk of how the instruments are connected to the research questions. Several of our research questions are answered through more than one instrument. All

instruments cited here have been developed by the evaluation team; we have not taken questions from other surveys.

Table A.2.2.   Data Collection Instruments and Description

Instrument	Description	Total Number of Respondents
Project Director Interview Guide (A-1)	Key informant interview guide designed to be used to interview project directors of the demonstration programs.	6
Case Manager Interview Guide (A-2)	Key informant interview guide designed to be used to interview demonstration program case managers who provide direct service to clients.	30
Partner Agency Interview Guide (A-3)	Key informant interview guide designed to be used to interview demonstration program partner staff.	30
Case Narrative Interview Guide (A-4)	Case narrative interview guides designed to be used to interview demonstration program case managers about treatment aspects for a range of clients served. These will be conducted via telephone following the first site visit.	30
Client Interview Guide (A-5)	Key informant interview guide designed to be used to interview clients of the demonstration programs.	30
Human Trafficking Evaluation Cost Module/ Human Trafficking Evaluation Labor Module (A-6)	Tool to be used to interview program directors about the costs and labor associated with their respective demonstration program (e.g., personnel, administrative, space rental/depreciation, utilities, communication, transportation, staff supports) and staff who work directly with the project (e.g., project directors, program managers, outreach staff, case managers, social workers, and finance staff).	6
Bimonthly Telephone Interviews with Project Director (A-7)	Telephone interview guide designed to be used to interview project directors of the demonstration programs bimonthly.	6

Table A.2.3.   Crosswalk of Research Questions and Instruments

Research Questions	Instrument/s
Community Needs Assessment	
1. To what extent do grantees utilize the community needs assessment to ensure that the right partners are involved, appropriate services are available and accessible, and resources are allocated appropriately?	• **Project Director Interview Guide**, section: *Community Assessment and Partnership Expansion Planning*
Partnership Expansion	
2. What networks and service linkages have been created to provide assistance to victims of trafficking? What are the key factors that facilitated or impeded the collaboration and coordination of services?	• **Project Director Interview Guide**, sections: *Partnership Composition and Development, Collaboration Structures and Activities, Referral Mechanisms and Information Sharing, and Partnership Functioning* • **Case Manager Interview Guide,** sections: *Partnership Composition and Development, and Referral Mechanisms and Information Sharing* • **Partner Agency Interview Guide:** all sections • **Case Narrative Interview Guide,** sections: *Comprehensive Services, and Services Utilized* • **Client Interview Guide,** sections: *Program Entry, and Services Utilized*
3. What is the nature and quality of the collaborations that were formed among providers of assistance to victims? What is necessary for these collaborations to form? What is necessary to sustain the collaborations?	• **Project Director Interview Guide**, sections: *Partnership Composition and Development, Collaboration Structures and Activities, Referral Mechanisms and Information Sharing, and Partnership Functioning* • **Case Manager Interview Guide,** section: *Partnership Composition and Development* • **Partner Agency Interview Guide,** sections: *Collaboration Structures and Activities, Partnership Functioning*
4. How does collaboration among the providers of victim services influence referral mechanisms? What aspects of coordination among providers influence successful referrals?	• **Project Director Interview Guide**, sections: *Referral Mechanisms and Information Sharing, and Partnership Functioning* • **Case Manager Interview Guide,** section: *Referral Mechanisms and Information Sharing* • **Partner Agency Interview Guide,** sections: *Referral Mechanisms and Information Sharing, and Partnership Functioning*
5. How has the grantee conducted community outreach to engage diverse partners?	• **Project Director Interview Guide**, section: *Partnership Composition and Development*

(continued)

Table A.2.3.   Crosswalk of Research Questions and Instruments (continued)

Research Questions	Instrument/s
Comprehensive Victim-Centered Services	
6. What does the case management component look like? What is the program model?	• **Project Director Interview Guide**, section: *Comprehensive Victim-Centered Services* • **Case Manager Interview Guide,** section: *Comprehensive Victim-Centered Services* • **Partner Agency Interview Guide:** section: *Comprehensive Victim-Centered Services* • **Case Narrative Interview Guide,** sections: *Program Engagement, Case Management, Victim-Centered Services,* and *Comprehensive Services* • **Client Interview Guide,** section: *Comprehensive Victim-Centered Services*
7. What information can be shared across agencies?	• **Project Director Interview Guide**, sections: *Partnership Composition and Development, Referral Mechanisms and Information Sharing,* and *Screening and Assessment* • **Case Manager Interview Guide,** section: *Referral Mechanisms and Information Sharing* • **Partner Agency Interview Guide:** section: *Referral Mechanisms and Information Sharing*
8. What are protocols for release of information? What do service providers and clients think is appropriate to share?	• **Project Director Interview Guide**, sections: *Partnership Composition and Development, Referral Mechanisms and Information Sharing,* and *Screening and Assessment* • **Case Manager Interview Guide,** section: *Referral Mechanisms and Information Sharing* • **Partner Agency Interview Guide:** section: *Referral Mechanisms and Information Sharing*
9. How do providers utilize screening tools and assessments in their case management protocols? To what extent are case management services victim-centered?	• **Project Director Interview Guide**, sections: *Screening and Assessment,* and *Comprehensive Services* • **Case Manager Interview Guide,** sections: *Screening and Assessment,* and *Victim-Centered Services* • **Partner Agency Interview Guide,** section: *Screening and Assessment* • **Case Narrative Interview Guide,** sections: *Screening/Assessment and Program Entry,* and *Victim-Centered Services* • **Client Interview Guide,** section: *Victim-Centered Services*

(continued)

Table A.2.3.   Crosswalk of Research Questions and Instruments (continued)

Research Questions	Instrument/s
Comprehensive Victim-Centered Services	
10. What services are provided, and what do they look like? How are the services delivered? To what extent are the services comprehensive?	• **Project Director Interview Guide**, sections: *Case Management, Comprehensive Services, Victim-Centered Services, and Program Strengths and Weaknesses* • **Case Manager Interview Guide,** sections: *Case Management, Program Engagement Strategies, Comprehensive Services, Victim-Centered Services, and Program Strengths and Weaknesses* • **Partner Agency Interview Guide,** sections: *Partnership Functioning, and Comprehensive Services* • **Case Narrative Interview Guide,** sections: *Case Management, Victim-Centered Services, and Comprehensive Services* • **Client Interview Guide,** sections: *Case Management, Victim-Centered Services, Progress Toward Outcomes, Program Strengths and Weaknesses*
11. What have been service providers' and clients' experiences with the program? What do they see as working well? What do they see as not working?	• **Project Director Interview Guide**, sections: *Staff Supervision and Support, Program Strengths and Weaknesses* • **Case Manager Interview Guide,** sections: *Staff Supervision and Support, Program Engagement Strategies, and Program Strengths and Weaknesses* • **Partner Agency Interview Guide,** section: *Staff Support and Supervision* • **Case Narrative Interview Guide,** all sections • **Client Interview Guide,** all sections
12. To what extent are victims of trafficking who are otherwise ineligible for federally funded services provided with needed services?	• **Project Director Interview Guide**, section: *Comprehensive Services; Community Outreach, Training, and Technical Assistance* • **Case Manager Interview Guide,** section: *Comprehensive Services* • **Partner Agency Interview Guide,** section: *Community Resources to Prevent Human Trafficking and Respond to Trafficking Victims* • **Case Narrative Interview Guide,** section: *Victim Centered Services* • **Client Interview Guide,** sections: *Victim-Centered Services*

(continued)

Table A.2.3.   Crosswalk of Research Questions and Instruments (continued)

Research Questions	Instrument/s
Survivor Experiences and Outcomes	
13. What are the characteristics of the clients served through the program? What were their trafficking experiences? How were they identified as trafficking victims? To what extent have clients previously interacted with human services programs or the child welfare system?	• **Case Narrative Interview Guide,** sections: *Demographics, Screening/Assessment and Program Entry, and Trafficking Status* • **Client Interview Guide,** sections: *Program Entry, and Demographics*
14. What types of supports do clients most want? To what extent do clients access the services that best meet their needs? What needs are difficult to meet?	• **Case Narrative Interview Guide,** sections: *Program Engagement, Case Management, Victim-Centered Services, Comprehensive Services, Services Utilized, and Progress Toward Outcomes* • **Client Interview Guide,** sections: *Service Needs, Services Utilized, Case Management, Victim-Centered Services, Progress Toward Outcomes, and Program Strengths and Weaknesses*
15. To what extent do clients make progress toward their individual goals?	• **Case Narrative Interview Guide,** section: *Progress Toward Outcomes* • **Client Interview Guide,** section: *Progress Toward Outcomes*
16. To what extent do clients make progress toward appropriate, short-term indicators of health, safety, and well-being?	• **Case Narrative Interview Guide,** section: *Progress Toward Outcomes* • **Client Interview Guide,** section: *Progress Toward Outcomes*
Cost	
17. What are the costs associated with the case management component? What are the costs associated with ensuring that victims receive the services that are needed and available?	• **Human Trafficking Evaluation Cost Module/Human Trafficking Labor Cost Module,** all sections
18. What are the costs associated with providing needed services that would otherwise be unavailable in the community?	• **Human Trafficking Evaluation Cost Module/Human Trafficking Labor Cost Module,** all sections

A.3   Improved Information Technology to Reduce Burden

Our data collection requires that we employ qualitative research methods through the use of in-person, in-depth interviews. Where possible and upon participant consent, we will audio record the interviews to capture all information and assist with report preparation.

In addition to interviews conducted during site visits, RTI will arrange a call with each grantee every 2 months. This will allow the evaluation team to monitor site progress without imposing frequent in-person visits on the sites.

A.4 Efforts to Identify Duplication

A study of the implementation of a comprehensive, intensive case management approach, as defined by ACF, is new to the field of domestic human trafficking research. ACF has conducted very few projects in the field of human trafficking, none of which have focused on case management among domestic victims. The Department of Justice's National Institute of Justice funded research beginning in 2009 to evaluate the implementation of programs funded by the Office of Victims of Crime and to identify promising practices to help service providers and law enforcement agencies make informed decisions about services to minor victims of sex and labor trafficking. The current work expands upon the previous research and does not duplicate any evaluation efforts of these demonstration projects at the local or national levels.

A.5 Involvement of Small Organizations

The three demonstration programs included in this evaluation are small community-based organizations. To minimize any burden on these organizations resulting from the data collection process, the evaluation team will schedule all interviews at the convenience of the case managers, project directors, partner agencies, and clients, and restrict the interview length to the minimum required. RTI does not believe that data collection will impact the organizations' operations or ability to serve clients.

A.6 Consequences of Less-Frequent Data Collection

The RTI evaluation team will collect data during two site visits, one in summer of 2016 and one in summer of 2017, to each of the three demonstration sites. Each site visit will include interviews with program directors, case managers, program partner staff, and program clients. These visits will be supplemented by interviews with grantee project directors every 2 months to measure site progress (which would not be possible with only a single site visit) while minimizing the data collection burden. Given the qualitative nature of the data collection, RTI believes that yearly site visits and bimonthly calls will permit a robust examination of program implementation. The interview with program directors, case managers, program partner staff, and program clients will enable the evaluation to collect multiple perspectives and allow for a 360-view of the program. Less frequent calls or visits, and fewer interviews with a variety of participants, would increase error in recall about program activities and events and inhibit the descriptive ability of the evaluation.

A.7   Special Circumstances

There are no special circumstances for this data collection.

A.8   Federal Register Notice and Consultation

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13 and OMB regulations at 5 CFR Part 1320 [60 FR 44978, August 29, 1995]), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on December 7, 2015, Volume 80, Number 234, page 76021–76022, and provided a 60-day period for public comment. A copy of this notice is included in **Appendix B**. No substantive comments were received during the 60-day notice period. RTI also consulted with an expert panel on the design of the evaluation and the questions. This included:

- Frances Butterfoss, President, Coalitions Work
- Heather Clawson, Vice President, Communities in Schools
- Vednita Carter, Executive Director, Breaking Free
- Lisa Hammond, Independent Consultant
- Tammy Hopper, Project Director, Runaway and Homeless Youth Training and Technical Assistance Center
- Janelle Moos, Executive Director, Council on Abused Women's Services/Coalition Against Sexual Assault
- Sandy Naoom, Associate Director, National Implementation Research Network
- Colleen Owens, Research Associate, Urban Institute
- Mary Ann Scheirer, Mary Ann Scheirer Consulting

A.9   Incentives for Respondents

RTI proposes an incentive for clients participating in interviews. There is extensive research on the use of incentives for research participants and the literature supports the use of incentives for increasing response rates and as compensation for respondent time and effort.[11] A methodological review conducted by SAMHSA demonstrated that increasing $20 incentives to $40 incentives increased response rates and disclosure of sensitive information.[12] RTI proposes a $25 gift card, which represents $15 for 2 hours (1 hour interview, 1 hour travel time using Bureau of Labor Statistics minimum wage of $7.25) and $10 for travel expenses and as appreciation for their participation. This incentive recognizes the value of trafficking victims' time. In other studies by RTI, comparable compensation has been offered. In the Development and Evaluation of an Intervention to Reduce Victim's Risk of Repeat Sexual Abuse/Assault (cooperative agreement sponsored by USDA NIFA), a $25 Amazon Gift Card was provided. In the National Survey of Child and Adolescent Well-Being (funded by ACF), incentives were provided to adult

caregivers of $25 for Wave 1 and $50 in Wave II (OMB # 0970-0202). Also, as suggested in the literature,[13] we wanted to prevent the incentive from being too high and at risk of being coercive, particularly because of the sensitive nature of the questions and the vulnerability of the clients.

Incentives will not be provided to grantee agency and partner agency staff. Grantee and partner agency staff will be interviewed during their normal workday hours about topics that are pertinent to their work (unlike clients who will be interviewed on their own time).

A.10   Privacy of Respondents

The proposed information collection was reviewed by RTI's Office of Research Protection. It was determined to not be research as defined by the U.S. federal human subjects' regulations. The data collection was determined to be a program evaluation, and the Privacy Act is not applicable. RTI will prioritize privacy of participants in all phases of research, including key informant interviews, case narrative interviews, and client interviews.

Although the key informant interviews will not include sensitive information, RTI will take measures to ensure respondents' privacy. With the respondent's permission, the evaluation team will audio record the interview as a backup to their notes. Before the interview starts, the interviewer will describe the purpose of the interview and summarize how the data will be used and privacy measures that are in place. Participants will be informed that their participation is voluntary, and that their identity and anything they say will be treated in a secure manner. After the notes are finalized, the audio recording will be erased. Interview notes will not include the participant's name, but the typed notes will be saved on RTI's private network in a share drive that only authorized RTI evaluation team members can access. Further, interview data will be summarized in dissemination documents with no link to their identity. Respondents will be asked not to share any personally identifiable information about program participants; if identifiable information is inadvertently shared by a respondent, it will be redacted from the interview notes.

Case narrative interviews will not include any information that could be used to identify the client, and case managers will be instructed to use pseudonyms when describing clients. However, the case narrative interviews may include sensitive information, such as unique trafficking experiences and service provision. RTI will take measures to ensure the privacy of the case manager providing the information and the privacy of each client who is being discussed. If case managers accidentally share identifying information, the evaluation team will exclude the information from the notes.

For client interviews, case managers will be asked to identify clients who meet the evaluation's selection criteria and offer them the chance to participate in an interview. Clients will be told that their decision to participate or not will have no effect on any services they receive from the program. This

assurance will be repeated by the evaluation team member conducting the interview. Additionally clients will be told that they may choose not to answer any questions and to stop the interview at any point. The RTI interviewer will explain to clients that information the client shares during the interview will be not be shared with program staff, nor will any information be reported that could individually identify them. The exception to privacy provisions will be any information indicating future harm to the client or another person.

All interviews will be conducted by two members of the evaluation team. Interviews will be recorded as a backup to written notes, as long as the respondent agrees. Audio recordings and written notes will only identify respondents by state and respondent role (in the case of key informant interviews) and a unique study ID (for case narrative and client interviews). After the notes are finalized, audio recording will be erased. During site visits, electronic notes will be transferred nightly from encrypted laptops to RTI's private network, using a share drive that only authorized RTI evaluation team members can access. Client interview data will be summarized in dissemination documents in a manner that does not reveal clients' identities. Any hard copy interview notes will be shredded after the notes have been typed up.

A.11 Sensitive Questions

Case narrative and client interviews may include sensitive information disclosed by case managers or clients while describing trafficking experiences and contextual backstories. Specifically, interviews may include discussion of sex behavior and attitudes; illegal, anti-social, self-incriminating, and demeaning behavior; and/or mental and psychological problems potentially embarrassing to respondents.

There is a risk that some questions may make clients feel uncomfortable when describing their personal experiences. To minimize this risk and avoid distress to clients during their interviews, RTI will work closely with case managers to select clients to be invited to participate in interviews.Toward this end, interviews will be conducted only with clients who are recommended by grantees as unlikely to be distressed by the interview. More specifically, criteria to invite clients to participate in interviews will include:

- **Safety:** We will *not* invite any clients for whom case managers believe an interview could potentially compromise client safety for any reason.

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[11]   Singer, E. and Ye, C. (2013) *The Use and Effects of Incentives in Surveys. The Annals, of the American Academey of Politicalt and Social Science, 645 (1) :*112-141.

[12]   Substance Abuse and Mental Health Services Administration (2014) *National Survey on Drug Use and Health: Summary of methodolical studies, 1971-2014.* Rockville, ME: Center for Behavioral Health Statistics and Quality, SAMHSA. Retrieved February 2016 from:

- **Mental health status:** We will *not* invite clients who are currently experiencing severe mental health issues, including but not limited to, post-traumatic stress disorder or suicidal ideation, as known by the case manager.
- **General emotional stability:** We will *not* invite clients who case managers believe may not have the emotional stability to answer interview questions or for whom case managers believe that interview questions will pose distress.
- **Level of involvement with the program:** We will invite clients who have participated in the program in a substantial way, as defined by program activities (e.g., a client who has undergone intake, assessments, and some level of case management).
- **Diversity:** We will invite clients who represent a diversity of backgrounds and demographics, such as type of trafficking experienced (labor and sex), race and ethnicity, gender and sexual orientation, age, and experiences/involvement with the program.

Clients will be told that their participation in any interviews is completely voluntary and that their decision to participate or not will have no effect on any services they receive from the program. This assurance will be repeated by the evaluation team member conducting the interview, along with the fact that clients may choose not to answer any questions and to stop the interview at any point. RTI will further protect client well-being by establishing site-specific protocols for responding to distressed clients, specifying people to contact and actions to take if a client exhibits severe distress.

A.12   Estimates of Information Collection Burden

These forms will be used for data collection for 2 years;.once in 2016 and once in 2017. We will complete 69 interviews per year for a total of 138 over the 2 years of program implementation. Respondents will be project directors and case managers at the three FY 2015 FYSB-funded demonstration projects; staff (e.g., program managers, project directors) from partner organizations that are working with the three FY 2015 FYSB-funded demonstration projects; and clients who have received services from the three FY 2015 FYSB-funded demonstration projects. Table A.12.1 provides the annual burden for this effort. The interviews, conducted in 2016, will also be conducted with the same respondents (or their replacement) in 2017.

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http://www.samhsa.gov/data/sites/default/files/NSDUHmethodsSummary2013/NSDUHmethodsSummary2013.pdf

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Table A.12.1.   Estimated Annualized Burden Costs and Total for 2-Year Data Collection

Activity	Total No. of Respondents	Annual No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in Hours)	Total Annual Burden Hours	Hourly Wage Rate[14]	Total Annual Respondent Costs
Project Director Interview Guide (A-1)	6	3	1	2	6	$32.56	$195.36
Case Manager Interview Guide (A-2)	30	15	1	1.25	19	$22.03	$418.57
Partner Agency InterviewGuide (A-3)	30	15	1	1.25	19	$32.56	$618.64
Case Narrative Interview Guide (A-4)	30	15	1	1	15	$22.03	$330.45
Client Interview Guide (A-5)	30	15	1	1	15	$7.25	$108.75
Human Trafficking Evaluation Cost Module/Human Trafficking Evaluation Labor Module (A-6)	6	3	1	1	3	$32.56	$97.68
Bimonthly Telephone Interviews with Project Director (A-7)	6	3	1	6	18	$32.56	$586.08
Total	138	69	N/A	N/A	95	N/A	$2,355.33

N/A = Not applicable.

A.13   Cost Burden to Respondents or Record Keepers

ACF does not anticipate additional costs to respondents other than time spent (captured in A.12.1, above).

A.14   Estimate of Cost to the Federal Government

The estimated cost to the federal government for the proposed data collection and analysis is $221,739. This figure includes labor hours, and other direct costs (travel, photocopying, mailing, etc.) for both years of data collection. The annual cost is $110,869.50.

A.15   Change in Burden

This is a new information collection.

A.16   Plan and Time Schedule for Information Collection, Tabulation, and Publication

The table below provides a timeline based on OMB approval in June 2016 with data collection beginning in July 2016. Specific dates are dependent on OMB approval.

A.16.1 Project Timeline for Information Collection

Activities and Deliverables	Due Date
Identify case narrative subjects and client interviews	June 2016 and June 2017
Onsite data collection	July 2016 and July 2017
Coding and data entry	August–September 2016 August–September 2017
Analysis	Ongoing with inclusion of bimonthly calls
Telephone interview with project directors	Every two months beginning July 2016
Draft final report	January 2018
Revised final report	February 2018

A.17 Reasons Not to Display OMB Expiration Date

OMB expiration date will be displayed on necessary materials and documents.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

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