

Identifying and Addressing Human Trafficking in Child Welfare Agencies

OMB Information Collection Request
0970 – New Collection

Supporting Statement Part A

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Submitted By:
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**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Part A

Executive Summary

Type of Request: This Information Collection Request is for a new request. We are requesting 2 years of approval.

Description of Request:

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for a one-time qualitative case study of state and local child welfare human trafficking leaders, casework supervisors, and caseworkers. The goal of the Identifying and Addressing Human Trafficking in Child Welfare Agencies (IAHT) study is to better understand how child welfare agencies select and implement screening tools, train workers on their use, and explore how children and youth identified as trafficked or at increased risk of trafficking are connected to services that meet their needs. Findings will be used to inform child welfare practice by sharing information on widely approaches to screening and specialized services and those considered to be promising strategies.

The data collected in the study will not be representative and are not intended to be generalized to a broader population. We do not intend for this information to be used as the principal basis for public policy decisions.

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A1. Necessity for Collection

Human trafficking (HT) of youth is a growing public health and social justice concern (Institute of Medicine and National Research Council, 2013) (Rothman, et al., 2017). Defined as the exploitation of minors for forced labor or commercial sex, HT of minors crosses cultural and economic boundaries and has been linked to a wide range of short- and long-term physical and psychological health problems (Institute of Medicine & National Research Council, 2013).

Two federal laws have defined the child welfare (CW) system's role with respect to trafficking. The 2014 Preventing Sex Trafficking and Strengthening Families Act (Pub. L. 113-183) requires state CW agencies to identify, document, and respond to children and youth in their placement, care, or supervision who are identified as victims of sex trafficking or who are at risk of sex trafficking. The 2015 Justice for Victims of Trafficking Act (Pub. L. 114-22) extended these provisions by requiring state CW agencies to consider any child victim of sex trafficking as a victim of child maltreatment.

Although state and child welfare practice is evolving rapidly in response to the above legislation, earlier work by RTI under contract to ACF¹ indicates that many states are developing screening procedures, screening tools, and specialized services without the potential benefit of other states' experiences (Gibbs, Feinberg, Dolan, & Latzman, 2018). Data collection is needed to understand current promising child welfare practices and lessons learned.

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

A2. Purpose

Purpose and Use

The goal of the IAHT study is to better understand how child welfare agencies select and implement human trafficking screening tools and train workers on their use, and to explore how children and youth identified as trafficked or at increased risk of trafficking are connected to services that meet their needs.

This study has the potential to inform child welfare agencies' decisions on programs and practice related to human trafficking. Findings from this study may help inform child welfare practice by sharing information on widely used practices and those considered as promising strategies for identifying children and youth who have been trafficked and connecting them to specialized services. This information may include, for example, factors considered when selecting or developing screening tools, implementation experiences with screening, strategies for training child welfare staff on screening, and efforts to provide specialized services that are accessible and appropriate for different populations of children and youth.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker, and is not expected to meet the threshold of influential or highly influential scientific information.

¹ ACF has contracted with RTI to complete the work described in this request.

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Research Questions or Tests

The research questions (RQ) for this study are below. RQ1 will be addressed using material from state child welfare agencies' Annual Progress and Services Reports (APSRs) and websites.

RQ1: What are current practices among child welfare agencies nationally for screening for human trafficking and subsequent delivery of specialized services for children and youth who are identified as trafficking victims or at high risk of victimization?

RQ2: How do child welfare agencies with promising screening practices screen for human trafficking and train personnel to implement screening?

RQ2a. How do child welfare agencies select their approaches to screening for human trafficking, and what has been their experience in implementing these?

RQ2b. How do child welfare agencies train personnel on screening for human trafficking, and what has been their experience with training implementation?

RQ3: What is the relationship between screening and subsequent referrals for, access to, and delivery of specialized services for children and youth identified as trafficking victims or at high risk of victimization?

RQ3a. How do child welfare agencies connect children and youth to specialized services, and what has been their experience with this process?

RQ3b. How do child welfare agencies assess specialized services for children and youth who are likely trafficking victims or at increased risk, in terms of appropriateness, acceptability, availability, and accessibility?

Study Design

The IAHT study is a one-time qualitative study of state and local child welfare human trafficking leaders, casework supervisors, and caseworkers. We plan to collect data from state personnel in 25 states and local personnel in up to 8 states.

We will select approximately 25 state child welfare agencies (including both state-administered and state-supervised agencies) for telephone interviews and subsequently up to 8 sites (local child welfare agencies or offices) will be selected for case studies based on information collected in the telephone interviews. For details of selection criteria, see section B2 of the Supporting Statement Part B.

Data will be collected using a combination of telephone interviews as well as video and in-person individual and group interviews. Interviews with state and local human trafficking coordinators and casework supervisors include questions regarding agencies' human trafficking screening tools and practice, specialized services for children and youth identified as likely victims of human trafficking or at high risk for trafficking, and staff training related to human trafficking. Interviews with caseworkers will collect case narratives for selected children and youth to illustrate how identification of trafficking and connection to specialized services occur in practice. See **Table 1** for a more detailed list of topics covered in each interview and **Instruments 1-4** for the full set of interview questions.

The results of this study are not designed to be representative of or generalizable to a given subpopulation. For more details about limitation of this study, see Section B1 of the Supporting Statement Part B under Appropriateness of Study Design and Methods for Planned Uses.

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Table 1. Data Collection Overview by Instrument

| Instrument(s) | Respondent, Content and Purpose of Collection | Mode and Duration |
|---|--|---|
| <p>State Human Trafficking Coordinator</p> <p>Telephone Interview Guide</p> | <p>Respondents: State Human Trafficking Coordinators</p> <p>Content:</p> <ul style="list-style-type: none"> • Screening tools practice and variability within state • Assessment of screening tools and practice • Data on screenings conducted and outcomes in state • Next steps after children and youth identified as likely victims or increased risk of victimization • Availability of specialized services in the state and process for connecting children and youth to specialized services • Training provided to staff who conduct screenings, identify children and youth to screen, connect to specialized services and variability within the state • Resources to support training • Data on staff training within the state • Dissemination preferences for study findings • Suggested sites within state for case studies <p>Purpose: Document state leaders' description and assessment of screening, training, and specialized services</p> | <p>Mode: Telephone interview</p> <p>Duration: 90 minutes</p> |
| <p>Local Human Trafficking Coordinator</p> <p>Interview Guide</p> | <p>Respondents: Local Human Trafficking Coordinators</p> <p>Content:</p> <ul style="list-style-type: none"> • Variation from practices reported by state coordinator • Screening tools practice within agency • Assessment of screening tools and practice • Data on screenings conducted and outcomes • Next steps after children and youth identified as likely victims or increased risk of victimization • Availability of specialized services and process for connecting children and youth to specialized services • Training provided to staff who conduct screenings, identify children and youth to screen, connect to specialized services and variability within the state • Resources to support training • Data on staff training • Dissemination preferences for study findings <p>Purpose: Document local leaders' description and assessment of screening, training, and specialized services</p> | <p>Mode: Virtual or in-person interview</p> <p>Duration: 90 minutes</p> |

(continued)

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Table 1. Data Collection Overview by Instrument (continued)

| Instrument(s) | Respondent, Content and Purpose of Collection | Mode and Duration |
|--|--|---|
| Casework Supervisor Group Interview Guide | <p>Respondents: Casework Supervisors</p> <p>Content:</p> <ul style="list-style-type: none"> • Priority situations for screening • Approaches to encourage disclosure, build rapport, and trauma-informed practice • Identification other than by screening • Assessment of screening tools and practice • Implementation challenges and strategies • Next steps after children and youth identified as likely victims or at increased risk of victimization • Availability of specialized services and process for connecting children and youth to specialized services • Assessment of processes and specialized services • Content and delivery of training received by participants and their teams • Reinforcement of training in practice • Assessment of HT-related training • Dissemination preferences for study findings <p>Purpose: Document implementation experiences related to screening, training, and specialized services</p> | <p>Mode: Virtual or in-person group interview</p> <p>Duration: 90 minutes</p> |
| Caseworker Case Narrative Interview Guide | <p>Respondents: Caseworkers</p> <p>Content:</p> <ul style="list-style-type: none"> • Case-level implementation of screening practice or identification by other means • Case-level changes in services based on HT identification • Case-level experience with specialized services: source availability, access • Case-level circumstances of children and youth at time of identification of human trafficking <p>Purpose: Describe screening, training, and specialized services as implemented at individual case level</p> | <p>Mode: Virtual or in-person interview</p> <p>Duration: 60 minutes</p> |

Other Data Sources and Uses of Information

The study will also use extant data and previous work completed by the ACF Domestic Human Trafficking and the Child Welfare Population project. Extant data will include state child welfare agency websites and FY19 Annual Progress and Service Reports provided by states to ACF. These resources will be the primary source for Research Question 1, and will be used as a starting point for site selection and data collection with child welfare agencies, as described in Section A4.

A3. Use of Information Technology to Reduce Burden

Our data collection requires that we employ qualitative research methods through the use of key informant interviews and case narratives. For the State Human Trafficking Coordinator interviews, the

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study team will arrange a telephone call. This will allow the study team to collect data without imposing in-person visits to a larger number of states. Site-level interviews will be planned to do in-person with the possibility of completing using web-based video conferencing if needed or requested by the site.

For both the state coordinator interviews and the site level interviews, the contractor will audio record the interviews, with respondent consent.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The study team has worked to reduce participant burden by compiling data from extant sources and building on previous project products, as described in Section A2. The data required to address the study purpose is not available from existing sources and its collection will not duplicate previous efforts. Use of existing information reduces participant burden by identifying those child welfare agencies with strong and diverse practice. Interviews will build on, rather than duplicate, any data collected from extant sources. Selecting these agencies for primary data collection reduces the number of individuals who must be interviewed to achieve study objectives. Using extant data and previous research products also reduces the number of questions asked and level of detail required in interviews. However, the level of detailed information required for this study cannot be entirely obtained through other sources.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. Consultation

Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (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 June 26, 2020, Volume 85, Number 124, page 38371, and provided a sixty-day period for public comment. A copy of this notice is attached as **Appendix A**. During the notice and comment period, 1 comment was received, which is attached as **Appendix B**. This comment recommended site selection criteria consistent with those planned and reported in Supporting Statement B, Section B2, Methods and Design. The commenter also recommended the inclusion of tribal leaders in the study interviews. The study team agrees with the need for research with tribal communities to improve trafficking response. However, the selection methods in this study build on earlier tasks conducted as part of the ACF Domestic Human Trafficking and the Child Welfare Population project, which do not provide the information needed to select tribal leaders for the interviews. Therefore, the study team is not able to include tribal communities in the interviews. It will be important to include tribal communities in future research. The commenter also

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notes that research concerning youth trafficking should engage youth and survivors. The study team has engaged a range of survivor expert consultants in formative work informing the present study design. As the IAHT is focused on documenting current child welfare practice, the expert input on IAHT data collection instruments specifically was provided by leaders of child welfare agencies' human trafficking efforts (See [Table 2](#) below).

Consultation with Experts Outside of the Study

The study team consulted with several experts external to the study team to inform the data collection instruments. This included subject matter experts who currently or recently have directed human trafficking efforts in their state child welfare agencies. Revisions were made to capture the variations in terminology used by different screening instruments. Experts also suggested probes to existing questions, including those about the modifications and evaluations of screening tools, and opportunities for providing feedback on protocols.

Experts and affiliations are outlined in **Table 2**.

Table 2. Expert Consultants

| Expert Consultant | Affiliation |
|-------------------|--|
| Tammy Sneed | Director of Gender Responsive Adolescent Services at the Connecticut Department of Children and Families |
| Bethany Gilot | Human Trafficking Consultant at BGilot Consulting |

A9. Tokens of Appreciation

No tokens of appreciation will be provided to individual participants for this data collection.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

Personally identifiable information will be collected to the extent needed to schedule data collection and review interview notes. This will include name, agency, title, and work email and telephone number. No personally identifiable information will be linked to participant responses for the human trafficking coordinator or caseworker supervisor interviews. Interview notes will not include the participant's name. Other than information used to coordinate data collection, respondents will be asked not to share any personally identifiable information about themselves or others. If identifiable information is inadvertently shared by a respondent, it will be redacted from the interview notes.

Case narrative interviews will not request any information that could be used to identify the specific children and youth who have been identified as trafficked, and caseworkers will be instructed to use pseudonyms when describing them. If caseworkers accidentally share identifying information about an individual, the information will be redacted from the interview notes.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

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Assurances of Privacy

Information collected will be kept private to the extent permitted by law. RTI will complete this work under contract with ACF and will comply with all Federal and Departmental regulations for private information.

Information related to privacy of information will be included in the invitation to participate (Appendices D, E, F, and G). Before beginning interviews, the interviewer will again describe the purpose of the interview and summarize how the data will be used and privacy measures that are in place.

Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. For group interviews, respondents will be asked not to discuss the information shared by others but reminded that privacy cannot be guaranteed in this setting.

Case narrative interviews will not include any information that could be used to identify children or youth, and caseworkers will be instructed to use pseudonyms during the interview. 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 caseworker providing the information and the privacy of information concerning children and youth. If caseworkers accidentally share identifying information, the evaluation team will exclude the information from the notes.

With the respondents' permission, the interviewers will audio record the interview as a backup to their notes. After the notes are finalized, the audio recording will be erased. Interview notes will not include the participant's name, and written notes will be saved on RTI's private network in a share drive that only authorized RTI study team members can access. Further, interview data will be summarized in dissemination documents with no link to individuals' identity.

When summarizing what is learned from this study, reports will include innovative practices and challenges described by different states and counties (jurisdictions). However, participants will be given the opportunity to request that reports not identify their state or county in relation to anything they describe. They will be provided this opportunity both during the interview as well as when provided the interview summary.

In addition to project-specific training about study procedures, members of the data collection team receive training that includes general security and privacy procedures as a condition of their employment. All members of the data collection team will be knowledgeable about privacy procedures and will be prepared to describe them in detail or answer any related questions raised by respondents. Prior to initiating contact with respondents, study approval will be received from the RTI Institutional Review Board (IRB).

Data Security and Monitoring

The contractor has established data security plans for handling data during all phases of the data collection, as follows:

- Staff laptops will be password protected and disk encrypted. There are several levels of password-protected access required to view the files on the laptops. Failure to provide a password at any of the levels denies access to the files.

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- For in-person interviews, electronic notes will be transferred nightly from encrypted laptops to RTI's private network. All data will be transmitted and stored in a way that only members of the project team who are authorized and have need will have access. All project team members have been trained on data security procedures.
- All personnel working on the project must sign affidavits pledging that the data they will collect or work with will not be disclosed. Penalties for disclosure include termination of employment and substantial financial fines.
- Access to project file shares, systems, and data is strictly controlled by role-based security in the form of Windows security groups. An individual's security group membership is determined based on the minimum necessary access to perform their job function on the project. Staff are only added to security groups after completing the Project Confidentiality Pledge and any required trainings on data security. Security group membership is audited quarterly by project leaders to ensure that only those who still need specified access continue group membership.

For details of data quality monitoring, please see Section B4 of Supporting Statement B under Data Quality.

Prior to data collection, RTI will submit a Data Safety and Monitoring Plan that documents all types of data that will be collected, privacy assurances provided to respondents, and staff training requirements. RTI shall ensure that all of its employees, and any subcontractors or employees of subcontractors who perform work under this contract, are trained on data privacy issues and comply with the above requirements.

As specified in the contract, RTI shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. RTI will securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. RTI shall: ensure that this standard is incorporated into RTI's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, RTI will minimize to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information²

The state and local human trafficking coordinator and casework supervisor interview guides do not include sensitive questions.

² Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

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Because the caseworker case narrative interview is intended to understand the implementation of human trafficking screening and specialized services protocol for children and youth served by the agency, it deals with several sensitive topics. This information is necessary to address the study’s core research questions and is not reliably available from other sources.

The case narrative interview includes questions about the experiences of specific children and youth served by the participating agency. Potentially sensitive questions include, for example trafficking experiences and receipt of services. RTI will take measures to ensure the privacy of the caseworker providing the information and the privacy of each child or youth who is being discussed. As noted in A10 under Personally Identifiable Information, the interviewer will not collect any PII for the child or youth. At the beginning of the interview, caseworkers will be reminded not to use the child’s or youth’s name or anything else that could identify him or her. If caseworkers accidentally share identifying information, the study team will exclude the information from the notes.

All study materials and procedures are in the process of being reviewed by the contractor’s IRB (Federalwide Assurance #3331, effective until November 2023).

A12. Burden

Explanation of Burden Estimates

The data collection instruments will be used over the span of about 2 years. We will collect data from 121 individuals over the 2-year data collection period. Respondents will be state and local agency leaders, casework supervisors, and caseworkers. Table 3 provides the annual burden for this effort. To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage for each participant, according to May 2018 data available from the Bureau of Labor Statistics (BLS) for administrative services managers, social service managers, and child and family social workers.³

Estimated Annualized Cost to Respondents

Table 3. Estimated Annualized Cost to Respondents

| <i>Instrument</i> | <i>No. of Respondents (total over request period)</i> | <i>No. of Responses per Respondent (total over request period)</i> | <i>Avg. Burden per Response (in hours)</i> | <i>Total Burden (in hours)</i> | <i>Annual Burden (in hours)</i> | <i>Average Hourly Wage Rate</i> | <i>Total Annual Respondent Cost</i> |
|---|---|--|--|--------------------------------|---------------------------------|---------------------------------|-------------------------------------|
| State Human Trafficking Coordinator Telephone Interview Guide | 25 | 1 | 1.5 | 37.5 | 19 | 50.99 | \$968.81 |
| Local Human Trafficking Coordinator Interview Guide | 8 | 1 | 1.5 | 12 | 6 | 50.99 | \$305.94 |
| Casework | 40 | 1 | 1.5 | 60 | 30 | 34.46 | \$1,033.80 |

³ <https://www.bls.gov/news.release/ocwage.t01.htm>

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| | | | | | | | |
|--|-----|---|---|-------|----|-------|------------|
| Supervisor Group Interview Guide | | | | | | | |
| Caseworker Case Narrative Interview Guide | 48 | 1 | 1 | 48 | 24 | 23.92 | \$574.08 |
| Total | 121 | | | 157.5 | 79 | | \$2,882.63 |

A13. Costs

There are no additional costs to respondents.

A \$500 honoraria will be offered to the up to 8 agencies participating in the case studies, in recognition of the time and expertise that agencies contribute to the data collection. This includes on-site coordination of information collection activities (see section B4 of the Supporting Statement Part B for additional information) and professionals' completion of data collection activities as part of their professional duties.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$649,221. Annual costs to the Federal government will be \$324,611 for the proposed data collection. Estimated annualized costs to the federal government over the requested two-year approval period are provided in the following table.

Table 4. Estimated Annualized Costs to the Federal Government

| Cost Category | Estimated Costs |
|--|-----------------|
| Instrument Development and OMB Clearance | \$ 282,805 |
| Field Work | \$ 140,885 |
| Analysis | \$ 78,047 |
| Publications/Dissemination | \$ 147,484 |
| Total costs over the request period | \$649,221 |
| Annual costs | \$324,611 |

A15. Reasons for changes in burden

This is a new information collection request.

A16. Timeline

Table 5 outlines the key time points for the study and for information collection, analysis, and reporting.

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Table 5. Plan and Time Schedule for Information Collection, Tabulation, and Publication

| Project Activity | Time period |
|-------------------------|--|
| Data collection | 16 months, following OMB approval |
| Data analysis | 4 months, following data collection |
| Draft final report | About 2 months after completion of data analysis |
| Revised final report | About 4 months after completion of data analysis |

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

- Instrument 1: State Human Trafficking Coordinator Telephone Interview Guide
- Instrument 2: Local Human Trafficking Coordinator Interview Guide
- Instrument 3: Casework Supervisor Group Interview Guide
- Instrument 4: Caseworker Case Narrative Interview Guide
- Appendix A: 60-Day Federal Register Notice – IAHT
- Appendix B: Public Comments – IAHT
- Appendix C: State Participation Invitation
- Appendix D: State Human Trafficking Coordinator Advance E-mail
- Appendix E: Local Human Trafficking Coordinator Advance E-mail
- Appendix F: Casework Supervisor Advance E-mail
- Appendix G: Caseworker Advance E-mail

References

Gibbs, D. A., Feinberg, R. K., Dolan, M. M., & Latzman, N. E. (2018). *Report to Congress: The child welfare system response to sex trafficking of children*. . U.S. Department of Health and Human Services, Administration for Children and Families.

Institute of Medicine and National Research Council. (2013). *Confronting commercial sexual exploitation and sex trafficking of minors in the United States*. Washington, DC: The National Academies Press.

Rothman, E., Stoklosa, H., Baldwin, S., Chisolm-Straker, M., Price, R., & Atkinson, H. (2017). Public health research priorities to address US human trafficking. *American Journal of Public Health*, 1045-1047.