

The Office on Trafficking in Persons (OTIP) received two comments to the proposed new information collection, Domestic Victims of Human Trafficking Program Data. The Freedom Network and National Survivor Network requested the following changes to the information collection:

- **All Forms – Use a randomized client identifier system that does not disclose personally identifying information,**

OTIP included guidance to grantees that the client identifier should be a system generated code.

- **Client Characteristics and Enrollment Form – Remove data elements unnecessary for the determination of program eligibility**

The purpose of the DVHT information collection is to assess program performance, inform evaluation, tailor technical assistance, respond to Congressional reports and inquiries, and inform policy and program development. Moreover, the U.S. Advisory Council on Human Trafficking has requested that OTIP collect information on specialized populations including men and boys, American Indians and Alaska Natives, the elderly, and LGBTQ populations. Thus, the information collection will retain data elements critical to understanding and assessing the unmet needs of at risk populations to inform program development including the client's:

- Age,
- Sex,
- LGBTQ affiliation,
- Disability status, and
- Tribal affiliation.

OTIP will also retain data elements needed to inform program evaluation efforts and guide policy discussions with federal partners such as the Department of Housing and Urban Development including the client's:

- Service needs,
- Enrollment into the DVHT program,
- Employment status at intake, and
- Living situation at intake.

In response to public comments, OTIP has eliminated data elements on the clients' English fluency, Polyvictimization history, risk factors, systems involvement, and whether they were referred to law enforcement. OTIP also eliminated data elements on the counties and states where clients originated.

To address concerns around burden, OTIP has collapsed the referral source category. The data element was retained to inform technical assistance provided to grantees. While OTIP kept data elements on the client's trafficking experience, language was added to clarify that the data elements were voluntary and that the information was not required for enrollment into the DVHT program, as well as highlighting the ability for the grantee to mark unknown when the information is not provided. The data elements were retained to inform victim identification and other prevention efforts led by the office.

- **Client Characteristics and Enrollment Form – Increase the burden estimate,**
OTIP increased the burden estimate to one hour.

- **Client Service Use and Delivery Form – Replace questions on services and benefits accessed by the client with a yes or no question on whether clients accessed any service or benefit,**
OTIP kept the data elements capturing the type of services and benefits accessed during the reporting period to ensure grant compliance in providing comprehensive case management, inform program evaluation efforts, and assess whether clients are receiving the services and benefit they need.

- **Client Case Closure Form – Remove all data elements except for the date,**
In order to assess client outcomes and program success, OTIP kept the data elements on the client's
 - Reason for exiting the program,
 - Living situation at program exit,
 - Employment status at program exit, and
 - Whether the client received a referral for continued case management.

- **Partnership Development and Expansion Forms – Limit reporting on partnerships to subrecipients receiving funding from the primary grantee**
OTIP limited grantee reporting on partnerships to subrecipients within their service network.