

National Human Trafficking Hotline (NHTH) Performance Indicators

**OMB Information Collection Request
0970 - NEW**

Supporting Statement Part A - Justification

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Submitted By:
Office on Trafficking in Persons
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

Section 107(b)(1)(B)(ii) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended at 22 U.S.C. § 7105(b)(1)(B)(ii), authorizes the Secretary of Health and Human Services to make a grant for a national communication system—the National Human Trafficking Hotline (NHTH)—to assist victims of severe forms of trafficking in persons in seeking help, receiving referrals, and reporting potential trafficking cases.

The Office on Trafficking in Persons (OTIP) made an award in the form of a Cooperative Agreement to a single, competitively selected grantee to maintain and support operation of the NHTH throughout the United States and U.S. territories. The NHTH is a toll-free hotline that operates 24 hours a day, every day of the year.

The Cooperative Agreement delineates the roles and responsibilities for the administration of the grant program, which include:

1. Operating the NHTH with experienced and trained anti-trafficking advocates;
2. Operating the NHTH website and responding to online signals;
3. Promoting NHTH services to increase the identification and protection of victims of severe forms of human trafficking;
4. Providing timely information and service referrals to human trafficking victims using a trauma-informed, person-centered, culturally responsive, and linguistically appropriate approach;
5. Notifying law enforcement agencies of potential cases of human trafficking as well as instances when a trafficking victim is in imminent danger, and;
6. Documenting emerging trafficking schemes to assist in the detection and investigation of trafficking cases.

Hotline Advocates who operate the NHTH collect information about signalers (individuals who contact the Hotline) and from signalers regarding potential victims of a severe form of trafficking in persons and potential human trafficking cases. Given the unique relationship the NHTH has to the public, OTIP is seeking clearance to collect information about and from these signalers that will be summarized and reported to OTIP by the NHTH grantee in the aggregate. This information collected through this information collection is necessary to support the monitoring of work done through this cooperative agreement, ensure signalers receive information and support needed, provide appropriate technical assistance (TA) to the grantee, and to document emerging trafficking schemes.

2. Purpose and Use of the Information Collection

The main purpose of this information collection is to improve OTIP's monitoring of the grantee's overall performance and to assess the extent to which the grantee is meeting required program activities to:

- Ensure potential victims of trafficking remain able to access assistance by constantly

- monitoring and mitigating factors impacting NHTH operations;
- Assist the grantee to assess and improve their project over the course of the project period;
- Disseminate insights related to human trafficking cases and trends to inform anti-trafficking strategies and policies; and
- Provide information to Congress, other federal agencies, stakeholders, the public, and other countries on the aggregate outputs and outcomes of the NHTH operations.

Information about signals and signalers informs, in particular, OTIP's visibility into the grantee's efforts to:

1. Promote NHTH services to increase the identification and protection of victims of severe forms of human trafficking;
2. Provide timely information and service referrals to human trafficking victims using a trauma-informed, person-centered, culturally responsive, and linguistically appropriate approach;
3. Notify law enforcement agencies of potential cases of human trafficking as well as instances when a trafficking victim is in imminent danger, and;
4. Document emerging trafficking schemes to assist in the detection and investigation of trafficking cases.

The NHTH Performance Indicator information is also used to inform the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act of 2000, as amended and for the purposes of fulfilling Government Performance and Results Act (GPRA) of 1993 requirements. Information is also used to inform State Department reports, Comptroller General requests, HHS Inspector General requests or investigations, congressional subpoenas or requests, court orders, and other authorized disclosures.

Through this information collection, OTIP will not collect any personally-identifiable information and **this information collection does not seek to collect any information from signalers (respondents) that they would not otherwise provide to Hotline Advocates in order to seek help, receive referrals, or report potential trafficking cases.** Rather, this information collection would provide OTIP with information about signalers that the grantee already collects to manage cases and administer the grant program, but is not currently provided to OTIP. The grantee currently provides OTIP with general performance data about the Hotline (ex. # of signals, # of referrals, etc.). This request for the grantee to provide additional information about signals and signalers.

3. Use of Improved Information Technology and Burden Reduction

Potential victims, representatives of governmental entities, law enforcement, first responders, members of the community, and representatives of nongovernmental entities providing social, legal, or protective services to individuals in the United States who may have been

subjected to severe forms of trafficking in persons utilize the NHTH as signalers. The NHTH provides these individuals with several different ways to contact Hotline Advocates out of recognition that one means of contacting the hotline may be more burdensome than others for certain signalers depending on their needs and circumstances. Signals can take the form of calls, texts, online tip forms, live web chats, or emails.

OTIP will provide an Excel-based data collection and reporting instrument to reduce the reporting burden on the NHTH grantee. This template will be structured to be compatible with the NHTH grantee's case management system and data export functionality. This reporting template will allow OTIP to merge and sort data across time in an efficient way and minimize errors in reporting. The NHTH grantee will submit reports electronically through GrantSolutions.

4. Efforts to Identify Duplication and Use of Similar Information

While there are other state and local human trafficking hotlines, the NHTH is the only official hotline that is national in scope. The performance indicator data to be collected relates specifically to the ACF NHTH and information from the one awarded grantee per the Cooperative Agreement. Other federal programs will not concurrently assist the sole NHTH operator, so there is no duplication.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

Due to the urgent and sensitive nature of the work of the NHTH, it is imperative for OTIP to remain as up-to-date as possible on factors that may impact the NHTH responsiveness rate, evolving human trafficking trends, gaps in services, and other trends that significantly impact operations like COVID-19, viral misinformation campaigns, and targeted spoofs. Delays in receiving this information could result in potential victims of trafficking missing the assistance they need because the NHTH (and OTIP, as the awarding agency) have not mitigated challenges and obstacles. For example, information requested related to operational indicators like *Wait Time* and *Missed Signal Rate* provide immediately actionable insight into the responsiveness of the NHTH. Incoming signals to the Hotline increased by 28 percent in the first 6 months of 2021 compared to the same period in the prior year. At the same time, the NHTH experienced a staff turnover rate of 13 percent with limited capacity to hire new personnel. When this operational data is coupled with the performance data requested (like information about *Signalers' Primary Reason for Contacting the Hotline* or *Signaler Proximity to the Situation*), OTIP is able to see whether these developments impact responsiveness and the grantee's ability to administer the NHTH and fulfill

requirements of the award. Insights derived from signaler data ultimately strengthen the NHTH operations and the broader response to trafficking in persons.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

As stated above, due to the urgent and sensitive nature of the work of the NHTH, it is imperative for OTIP to remain as up-to-date as possible to effectively address factors impacting the NHTH responsiveness rate, ever-evolving human trafficking trends, gaps in services, and external factors that significantly impact operations like COVID-19, viral misinformation campaigns, and targeted spoofs.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 07/21/2021, Volume 86, Number 137, 38489-38490 and provided a sixty-day period for public comment. During the notice and comment period, one comment was received from the NHTH grantee. OTIP's responses are included as Attachment A.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Although the NHTH collects personally identifiable information, this information collection request is for *aggregate* information from the grantee; OTIP is not requesting to receive any personally identifiable information.

The NHTH collects and safeguards all information personally identifiable information and other information that is considered sensitive, consistent with applicable federal, state, local and tribal laws regarding privacy and obligations of confidentiality. All communication with the NHTH is strictly confidential, to the extent permitted by law. When a signaler contacts the NHTH, they are informed that they can get help or report a tip anonymously, and that they are required to share only as much information as they are comfortable providing. The NHTH's confidentiality policies can be accessed here:

<https://humantraffickinghotline.org/privacy-policy-and-terms>. The NHTH grantee will never share personally identifying information about the signaler to any external agency, including law enforcement, service providers, and government agencies, without the explicit permission of the signaler, unless required by law. Exceptions include situations in which the

signaler appears to be in imminent danger and the information is necessary to ensure his/her immediate safety; the victim is a minor; or the individual has admitted to committing a lethal crime or sexual assault, endangering the well-being of a child, or disclosing a specific intent to imminently commit these crimes. In these limited circumstances, the NHTH retrieves and reports information from caller ID or from the IP address.

As the operator of the NHTH, the grantee collects two types of data—personally identifying information, such as location of a particular trafficking case and name of an alleged trafficker, and non-personally identifying information, such as the city/state of signalers and how they learned about the NHTH. Personally identifying information about victims is only disclosed to law enforcement and/or service providers in situations where the NHTH has received the consent of the victim, the victim is a minor, or there is substantial information to suggest that the victim is in imminent danger. Service providers may only use such information for the purposes for which they were engaged by the NHTH. The NHTH grantee may use or share aggregate, non-personally identifying information collected from cases to analyze trends; produce reports regarding such trends, including Program Performance Reports (PPR) to OTIP and ad hoc reports; or publish heat maps. The NHTH maintains a robust case management and communication system to facilitate the collection, storage, access, transmission, and destruction of information, as well as for auditing and incident-handling functions.

OTIP will not be collecting any personally identifiable information about signalers from the grantee. Rather, the grantee will provide aggregate information about signalers (who may be potential victims of a severe form of trafficking in persons, service providers, law enforcement or investigatory personnel, or other community members) to OTIP through this collection. OTIP will use aggregate information for the purpose of fulfilling reporting requirements, interagency inquiries, and for research and analysis. Information is used to inform the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act of 2000, as amended and for the purposes of fulfilling Government Performance and Results Act (GPRA) of 1993 requirements. Information is also used to inform State Department reports, Comptroller General requests, HHS Inspector General requests or investigations, congressional subpoenas or requests, court orders, and other authorized disclosures.

11. Justification for Sensitive Questions

All signals made to the NHTH are voluntary and confidential in nature. Signalers (respondents) provide information related to potential victims or trafficking situations in order to make a tip or access referrals. Hotline Advocates who field signals may ask follow-up questions in order to assess the situation, identify trafficking indicators, direct resources, and gather the information necessary to administer the hotline and fulfill requirements of the grant award. The NHTH grantee is expected to maintain screening and reporting protocols in order to engage with and assist signalers in the most person-centered, trauma-informed, and culturally and linguistically appropriate way. This information collection does not seek to

collect any information from signalers (respondents) that they would not otherwise provide to the Hotline in order to seek help, receive referrals, or report potential trafficking cases.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents (Signalers)	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
National Human Trafficking Hotline (NHTH) Performance Indicators	585,300	1	0.433333	253,630	84,543	\$76.81	\$6,494,029.64

Potential victims, representatives of governmental entities, law enforcement, first responders, members of the community, and representatives of nongovernmental entities providing social, legal, or protective services to individuals in the United States who may have been subjected to severe forms of trafficking in persons utilize the NHTH as signalers. The cost to respondents was calculated using the most current Bureau of Labor Statistics (BLS) wage data (May 2020) for job codes [11-9151] Social and Community Service Managers, [23-0000] Legal Occupations, and [21-0000] Community and Social Service Occupations.

The average of the combined mean hourly rates of Social and Community Service Managers (\$36.13), Legal Occupations (\$54.00), and Community and Social Service Occupations (\$25.09) is \$38.41. To account for fringe benefits and overhead the rate is multiplied by two which is \$76.81. The estimated annualized total cost to respondents (signalers) is \$76.81 times 84,543 hours or \$6,494,029.64.

The burden to the record keeper (NHTH grantee) is estimated below.

Category of Respondent	No. of Respondents	No. of Responses Per Respondent	Burden Per Response	Total Burden Hours
National Human Trafficking Hotline (NHTH) Grantee	1	15	24.13 hours	362

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no other costs to the respondents (signalers) or record keepers.

14. Annualized Cost to the Federal Government

The estimated annual cost to the federal government is \$5,366.40

Grant performance progress reports are reviewed by salaried staff who assess program performance as a regular part of their work. ACF anticipates that the review of the information reported by the grantee(s) will cost \$46.72 per hour (job code 15-2041 and wage data from May 2020 and take 80 hours annually costing \$3,737.60 annually. This includes the time it takes for the data to be cleaned, organized, interpreted, and summarized into usable information. An additional 40 hours will be spent annually by the grant officer to review and discuss the submissions with the grantee at \$43.88 per hour (job code 19-3099 and wage data from May 2020 for an annual total of \$1,755.20.

15. Explanation for Program Changes or Adjustments

This information collection does not seek to collect any information from signalers (respondents) that they would not otherwise provide to Hotline Advocates in order to seek help, receive referrals, or report potential trafficking cases. Rather, this information collection would provide OTIP with information about signalers that the grantee already collects to manage cases and administer the grant program. The grantee currently provides OTIP with general performance data about the Hotline (ex. # of signals, # of referrals, etc.), however this request is for the NHTH grantee to provide additional information about signals and signalers. This additional information is needed to improve OTIP's monitoring of the grantee's overall performance and to assess the extent to which the grantee is meeting required program activities. Given the unique relationship the NHTH has to the public, OTIP is seeking clearance to collect this information about and from signalers from the NHTH grantee.

16. Plans for Tabulation and Publication and Project Time Schedule

OTIP will provide aggregate information on information collected for the purposes of submitting information for the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act. OTIP may also provide analysis of the information for other public purposes such as research reports and briefings of interest to the public. As outlined in Section 10, PII will not be provided to OTIP and will not be shared with the public by the grantee.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Due to the nature of the calls received by the NHTH, it would most often not be reasonable to spend time informing callers of the OMB Expiration Date. The NHTH Performance Indicator Data that is reported to OTIP by the NHTH grantee will display the OMB Expiration Date and PRA Statement, but Hotline Advocates will not read this information to signalers.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.