

**Public Comment: The utility of the information requested does not outweigh the negative impact of information collection on victims and survivors contacting the NHTH for help. Additionally, some of the information is not necessary to meet the mandate of the National Human Trafficking Hotline.**

**OTIP Response:**

The National Human Trafficking Hotline (NHTH or ‘Hotline’) is a hotline funded and overseen by the Administration for Children and Families Office of Trafficking in Persons (OTIP). This work is completed through a cooperative agreement. Hotline Advocates 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.

OTIP recognizes that the primary purpose of the Hotline is to support victims of trafficking and that data collection and reporting are secondary functions of the Hotline. Example secondary functions include ensuring the grantee meets the requirements of the grant, that the Hotline operates in a way to provide signalers with necessary information in a timely manner, and to document general trends in trafficking.

OTIP also recognizes that each signaler will provide different information to Hotline Advocates depending on their needs and reasons for contacting the Hotline. **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.** 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 is intended 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.

**OTIP will not be collecting any personally identifiable information 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.

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.

OTIP will also use this information 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.

Insights derived from this signaler data will ultimately strengthen the NHTH operations and the broader response to trafficking in persons. For example, information requested related to operational indicators like *Wait Time* and *Missed Signal Rate* provide immediate 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.

Although there is no additional burden imposed on signalers, OTIP has made some adjustments to reduce the associated burden on the recordkeeper (the NHTH grantee) to compile and transmit the requested information. Specifically, the data elements have been reduced to **only** include data elements that are **directly** related to requirements established in the Funding Opportunity Announcement (FOA) HHS-2020-ACF-IOAS-OTIP-TV-1807, the Cooperative Agreement, and the Corrective Action Plan. In addition, OTIP has modified the collection to include only those data elements that are primarily entered by the Hotline Advocates at the time of signal, as opposed to other staff within the organization (e.g. the grantee's data team). See below for additional information about these reductions.

**Public Comment: The agency has underestimated the burden of the proposed collection of information and does not consider the budgetary implications of the annual burden hours or the operational impact of additional information collection.**

**OTIP Response:**

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 NHTH—to assist victims of severe forms of trafficking in persons in seeking help, receiving referrals, and reporting potential trafficking cases.

HHS delegated that authority to OTIP and OTIP made an award in the form of a Cooperative Agreement to a single, competitively selected grantee, Polaris, to maintain and support operation of the NHTH throughout the United States and U.S. territories.

OTIP estimated the respondent’s burden based on the average duration of each NHTH signal (e.g. the amount of time signalers spend answering questions and providing information to Hotline Advocates in order to seek help, receive referrals, or report potential trafficking cases.). This public comment is not specific to the burden on respondents (signalers), rather the burden on the recordkeeper (the NHTH grantee, Polaris).

To reduce the burden on the recordkeeper, OTIP has modified the collection to remove several of the new data elements that were initially proposed. The remaining new data elements (e.g. data the grantee is not already providing to us as a condition of award), are intended to provide information to inform OTIP’s:

- Monitoring of performance and operational issues;
- Generation of timely insights into trends related to victim demographics and service needs, and the impact of particular intra- and inter-agency efforts, messaging campaigns, trainings, and other anti-trafficking efforts on NHTH signals, and;
- Responses to congressional inquiries and other ad hoc inquiries without submitting burdensome individual requests to the Hotline.

OTIP is also willing to work with the grantee around timing for final mid-year and year-end reports if additional time is needed to cleanse more labor-intensive data elements. OTIP has provided a justification for each data element in the tables that follow.

## Monthly Performance Indicator Report

### Human Trafficking Emergency-Related Request and Referral Data

Original Data Element	Proposed Change	Justification
Emergency-Related Service Requests - COVID-19  (Record the number of requests made for each emergency-related service during the reporting period.)	COVID-19 is an intersectional driver of exploitation. Its effects will not be sufficiently captured through this type of data collection. For this reason, we recommend maintaining the current structure.	OTIP recognizes that COVID-19 is an intersectional driver of socioeconomic service needs and that it may be difficult to determine how many requests or referrals are directly related to the challenges imposed by COVID-19. <b>OTIP suggests removing this data element in accordance with the public comment received to reduce burden.</b>
New Referral Partners Added to the Referral Database  (Record the number of new referral partners added to the referral database during the reporting period.)	Polaris reports on this data element semi-annually and we recommend this continues. If this cadence increases there will be staffing and cost implications.	The NHTH Funding Opportunity Announcement (FOA) HHS-2020-ACF-IOAS-OTIP-TV-1807 maintains that the grantee must develop, maintain, and update a comprehensive resource database or service locator. The database must include information on available shelters and supportive service providers that provide advocacy, case management, assistance accessing federal and state financial assistance programs, legal advocacy, health and mental
Referral Partners in the		

<p>Referral Database</p> <p>(Record the total number of referral partners in the referral database at the close of the reporting period.)</p>		<p>health care, assistance locating and securing safe and affordable emergency or permanent housing and homelessness prevention services, and other prevention services. The FOA further provides that the prime recipient must document 1,500 contacts within the first 6 months of award and increase the database referral network by 200 contacts each year.</p> <p>In order for OTIP to monitor progress toward these objectives, <b>OTIP suggests retaining these two data elements.</b></p>
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## Human Trafficking Case-Level Data

Original Data Element	Proposed Change	Justification
<p>Total Cases Reported to Law Enforcement</p> <p>(Record the number of potential trafficking cases reported to law enforcement by age of the potential victim(s) during the reporting period.)</p>	<p>Polaris reports on the number of potential trafficking cases reported to law enforcement. Information on the age of the victim is produced by Polaris analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>The NHTH Funding Opportunity Announcement (FOA) HHS-2020-ACF-IOAS-OTIP-TV-1807 maintains that the grantee is responsible for referring time-sensitive tips regarding potential trafficking cases to appropriate federal, state, tribal, and local law enforcement authorities as requested or required by law within 24 hours. The NHTH must defer to the individual seeking assistance on if, and when, to report their case to law enforcement, unless required to do otherwise by state-mandated child welfare reporting requirements.</p> <p>Additionally, based on Washington DC Mandated Reporting Requirements, Hotline advocates are considered mandated reporters. To fulfill DC’s mandated reporter requirement, the grantee is expected to update all protocols and processes to ensure that any disclosure of abuse, neglect, or trafficking of a minor, regardless of where it is occurring (inside or outside of DC), is reported to the appropriate child protective services. To fulfill this requirement, advocates are expected to execute the reports, Hotline Supervisors are expected to monitor to ensure requirements are met, and the Law Enforcement Partnership Manager is expected to maintain and update protocols that outline the process, including state-by-state requirements. Information is expected to be readily available.</p> <p>In order for OTIP to monitor the grantee’s performance and to ensure that mandatory</p>

		reporting requirements are being met, <b>OTIP</b> suggests <b>retaining this data element</b> .
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## Semi-Annual Performance Indicator Report

### Potential Victim Access, Referral, Report, Outcome Data

Original Data Element	Proposed Change	Justification
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<p>Referrals and Reports</p> <p>(Record the number of potential victims who received referrals or were reported to the listed entities during the reporting period.)</p>	<p>Polaris reports on similar data elements. Change in data structure would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>The NHTH Funding Opportunity Announcement (FOA) HHS-2020-ACF-IOAS-OTIP-TV-1807 maintains that the grantee is responsible for referring time-sensitive tips regarding potential trafficking cases to appropriate federal, state, tribal, and local law enforcement authorities as requested or required by law within 24 hours. The NHTH must defer to the individual seeking assistance on if, and when, to report their case to law enforcement, <b>unless required to do otherwise by state-mandated child welfare reporting requirements.</b></p> <p>At present, OTIP receives monthly data from the Hotline and one annual report. The current annual report contains referral and report summary data. OTIP suggests receiving this data from the grantee twice during the performance year, as opposed to only once in order for us to provide more timely insights into the impact of particular intra- and inter-agency anti-trafficking efforts, messaging campaigns, trainings, political events, stakeholder engagements, etc. on NHTH signals and reporting, as well as trends related to victim demographics/service needs and potentially operational issues, such as gaps in service provision.</p> <p>The current annual report requires the Hotline to provide data related to the following referrals and/or report types:</p> <ul style="list-style-type: none"> <li>• Child Protection Services</li> <li>• Domestic Violence Hotline/Services</li> <li>• DVHT Program Grantee</li> <li>• Law Enforcement</li> <li>• Other Service Provider</li> <li>• Other Trafficking Service Provider</li> <li>• Runaway Safeline/Services</li> <li>• SAMHSA Helpline/Services</li> <li>• Sexual Assault Hotline/Services</li> <li>• Suicide Prevention Lifeline/Services</li> <li>• TVAP Program Grantee</li> </ul> <p>In order for OTIP to monitor the grantee’s performance, gauge efforts toward maintaining the referral database, and ensure mandatory reporting requirements are being met, <b>OTIP suggests retaining this data element.</b></p>
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<p>Type of Outcome Received on Cases of Potential Trafficking</p> <p>(Record the number of potential victims for whom each outcome was logged during the reporting period.)</p>	<p>Polaris reports on similar data elements. Change in data structure would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>OTIP recognizes that given the nature of the NHTH, it is difficult to track and measure outcomes or the results of the NHTH’s efforts to issue referrals and provide assistance to signalers.</p> <p>At present, OTIP receives monthly data from the Hotline and one annual report. The current annual report contains Tip-related and Referral-related outcome data. OTIP suggests receiving this data from the grantee twice during the performance year, as opposed to only once in order for us to provide more timely insights into the impact of particular messaging campaigns, trainings, political events, stakeholder engagements, etc. on NHTH signals and reporting, as well as trends related to victim demographics/service needs and potentially operational issues.</p> <p>The grantee collects information on several potential case outcomes, including outcomes that OTIP is not requesting the grantee to report to us for the purposes of grant monitoring. The current annual report requires the Hotline to provide data related to the following outcomes:</p> <p><b>Tip</b></p> <ul style="list-style-type: none"> <li>• Investigation opened</li> <li>• LE referred to another LE agency</li> <li>• Investigation already in progress</li> <li>• LE collaborated with other LE on case</li> <li>• PV(s) located</li> <li>• PT(s) arrested</li> <li>• Case opened</li> <li>• PV(s) extracted</li> <li>• PT(s) located</li> <li>• Insufficient evidence found to proceed with investigation</li> <li>• Allegations unsubstantiated/unfounded</li> <li>• LE immediately dispatched</li> <li>• CPS involving LE</li> <li>• PT(s) charged with human trafficking</li> <li>• PV(s) not willing to cooperate with investigation</li> <li>• Case found to be other crime</li> <li>• PT(s) charged with other crime</li> <li>• Outcomes Reported Fewer Than 3 Times</li> </ul> <p><b>Referral</b></p> <ul style="list-style-type: none"> <li>• PV(s) received services from referral</li> </ul>
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		<p>organization</p> <ul style="list-style-type: none"> <li>• PV(s) ineligible for services because referral org assessed as non-trafficking</li> <li>• PV(s) unable to connect with referral organization</li> <li>• Outcomes Reported Fewer Than 3 Times</li> </ul> <p>In the interest of reducing burden to the grantee but still obtaining data to assess the efficacy of the NHTH’s services, <b>OTIP suggests paring down the number of outcomes the grantee is expected to report to us (only those that are green above) and allowing the Hotline to report this only in their annual, year-end submission.</b></p>
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### Potential Victim Demographic Data

Original Data Element	Proposed Change	Justification
<p>Potential Victims Identified by Gender</p> <p>(Record the total number of potential victims during the reporting period by gender.)</p>	<p>Demographic information about the victims is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>Shortly after taking office, President Biden issued <a href="#">Executive Order 13985</a> (<i>Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</i>), directing the Federal Government to pursue a comprehensive approach to advancing equity for all including people of color, foreign nationals, and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality in the United States. Individuals who experience trafficking—or vulnerable to it—often suffer disparities in education, health care, housing, employment, and access to public services, as well as a host of inequities that represent the social determinants of health.</p> <p>The NHTH grantee is expected to effectively serve all victims of all forms of trafficking in a person-centered, culturally appropriate, and trauma-informed manner, including individuals belonging to groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage, in order to increase identification of and support for individuals from these groups. OTIP is interested in collecting information related to <a href="#">Sexual Orientation and Gender Identity (SOGI) Survey Measures</a> to better support equity for individuals belonging to groups referenced in EO 13985.</p> <p>OTIP recognizes that gender identity information</p>



		<p>may not be obtained during every signal and that some cleansing of this data is required. In order to be responsive to EO 13985, <b>OTIP suggests retaining this data element. However, in order to reduce burden, OTIP can extend flexibilities to the grantee (such as allowing the grantee to submit preliminary figures at the time frequency reports are due, but allowing the grantee to submit subsequent, final figures once data cleansing can be conducted).</b></p>
<p>Potential Victims Identified by Citizenship Status</p> <p>(Record the total number of potential victims identified by citizenship status during the reporting period).</p>	<p>Polaris reports on the number of situations involving foreign nationals and U.S. citizens/LPRs, but does not report on citizenship status by victim. Additionally, many victims are not comfortable providing citizenship details. Tracking this information would further impede trust and may not be accurate if callers are afraid. We recommend maintaining the current system of recording and reporting on this information.</p>	<p>Shortly after taking office, President Biden issued <a href="#">Executive Order 13985</a> (<i>Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</i>), directing the Federal Government to pursue a comprehensive approach to advancing equity for all including people of color, foreign nationals, and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality in the United States. Individuals who experience trafficking—or vulnerable to it—often suffer disparities in education, health care, housing, employment, and access to public services, as well as a host of inequities that represent the social determinants of health.</p> <p>The NHTH grantee is expected to effectively serve all victims of all forms of trafficking in a person-centered, culturally appropriate, and trauma-informed manner, including individuals belonging to groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage, in order to increase identification of and support for individuals from these groups. OTIP is interested in collecting information related to citizenship status to better support equity for individuals belonging to groups referenced in EO 13985.</p> <p>Citizenship status may impact the types of benefits and services that a potential victim can access and OTIP’s current funding structure bifurcates spending based on citizenship status, so it is important for OTIP to gauge how many foreign national individuals leverage the Hotline’s services and for what types of assistance.</p> <p>However, OTIP recognizes that it may not be</p>

		<p>person-centered, culturally appropriate, and/or trauma-informed to ask each signaler their citizenship status, and that there may be some unintended consequences (such as a chilling effect on help-seeking behaviors) if potential signalers do not feel comfortable sharing this information. Further, OTIP recognizes that there are significant data privacy concerns and sensitivities to be mindful of when collecting information on citizenship status. Other data included in this collection can serve as a proxy for gauging the number of foreign national individuals seeking assistance through the NHTH (particularly data on the number of referrals issued to connect signalers with a TVAP Program Grantee and the data element on the total number of potential victims identified by country of origin). <b>OTIP suggests removing this data element in accordance with the public comment received to reduce burden.</b></p>
<p>Potential Victims Identified by Age and Type of Trafficking</p> <p>(Report the total number of potential victims who experienced each type of trafficking by age during the reporting period).</p>	<p>Age and country of origin of victims is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>OTIP is expected to be responsive to congressional and other ad hoc inquiries regarding Hotline data. OTIP consistently receives inquiries about the type of trafficking experienced by potential victims identified by the Hotline and the age of potential victims associated with those cases. In order to provide a timely response to these inquiries without submitting burdensome individual, ad hoc requests to the Hotline, OTIP is requesting to receive this information from the grantee on a semi-annual basis.</p> <p>OTIP recognizes that potential victim age and type of trafficking information may not be obtained during every signal and that some cleansing of this data is required. OTIP is not requesting the specific ages of individual potential victims related to any case. Rather, OTIP is requesting to know how many potential trafficking cases involve Adults (individuals 18 years of age or older), Minors (individuals under the age of 18) or Both Adults and Children. Based on the aforementioned mandatory reporting requirements, this information should be readily available and should not result in significant staffing or budget implications.</p> <p><b>OTIP suggests retaining this data element. However, in order to reduce burden, OTIP can extend flexibilities to the grantee (such as</b></p>

		<b>allowing the grantee to submit preliminary figures at the time frequency reports are due, but allowing the grantee to submit subsequent, final figures once data cleansing can be conducted).</b>
<p>Potential Victims Identified by Country of Origin</p> <p>(Report the total number of potential victims identified during the reporting period from each country.)</p>	<p>Age and country of origin of victims is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>The grantee is already providing the total number of potential victims identified by country of origin in their year-end, annual report. OTIP requested to receive this information on a semi-annual basis in order to obtain timely insights into the impact of particular inter- and intra-agency efforts, messaging campaigns, trainings, natural and political events, stakeholder engagements, etc. on NHTH signals as well as trends related to victim demographics/service needs.</p> <p><b>However, in order to reduce burden, OTIP suggests removing this data element from the semi-annual report and continuing to receive this information on a yearly basis.</b></p>

## Semi-Annual Performance Indicator Report

### Trafficking Emergency-Related Request and Referral Data

Original Data Element	Proposed Change	Justification
<p>Emergency-Related Service Requests - COVID-19</p> <p>(Record the number of requests made for each emergency-related service during the reporting period.)</p>	<p>COVID-19 is an intersectional driver of exploitation. Its effects will not be sufficiently captured through this type of data collection. For this reason, we recommend maintaining the current structure.</p>	<p>OTIP recognizes that COVID-19 is an intersectional driver of socioeconomic service needs and that it may be difficult to determine how many requests or referrals are directly related to the challenges imposed by COVID-19. <b>OTIP suggests removing this data element in accordance with the public comment received to reduce burden.</b></p>

### Human Trafficking Case-Level Data

Original Data Element	Proposed Change	Justification
<p>Total Cases Reported to Law Enforcement</p> <p>(Record the number of potential trafficking cases reported to law enforcement by age of the</p>	<p>Polaris reports on the number of potential trafficking cases reported to law enforcement. Information on the age of the victim is</p>	<p>The NHTH Funding Opportunity Announcement (FOA) HHS-2020-ACF-IOAS-OTIP-TV-1807 maintains that the grantee is responsible for referring time-sensitive tips regarding potential trafficking cases to appropriate federal, state, tribal, and local law enforcement authorities as requested or required by law within 24 hours. The</p>

<p>potential victim(s) during the reporting period.)</p>	<p>produced by Polaris analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>NHTH must defer to the individual seeking assistance on if, and when, to report their case to law enforcement, <b>unless required to do otherwise by state-mandated child welfare reporting requirements.</b></p> <p>Additionally, based on Washington DC Mandated Reporting Requirements, Hotline Advocates are considered mandated reporters. To fulfill DC’s mandated reporter requirement, the grantee is expected to update all protocols and processes to ensure that any disclosure of abuse, neglect, or trafficking of a minor, regardless of where it is occurring (inside or outside of DC), is reported to the appropriate child protective services. To fulfill this requirement, Hotline Advocates are expected to execute the reports, Hotline Supervisors are expected to monitor to ensure requirements are met, and the Law Enforcement Partnership Manager is expected to maintain and update protocols that outline the process, including state-by-state requirements.</p> <p>OTIP is not requesting the specific ages of individual potential victims related to any case reported to law enforcement, which is information about the victim that is produced by Polaris analysis outside of the NHTH when resources are available. Rather, OTIP is requesting to know how many cases involve Adults (individuals 18 years of age or older), Minors (individuals under the age of 18) or Both Adults and Children. Based on the aforementioned mandatory reporting requirements, this information should be readily available and should not result in significant staffing or budget implications.</p> <p>In order for OTIP to monitor the grantee’s performance and to ensure that mandatory reporting requirements are being met, <b>OTIP suggests retaining this data element.</b></p>
<p>Signaler Proximity to Situation or Victim  (Record the number of potential trafficking cases where the signalers</p>	<p>Information on proximity of signaler is produced by analysis outside of the NHTH when resources are</p>	<p>The governing legislation that underpins the current performance landscape is the Government Performance and Results Act (GPRA) of 1993 and the GPRA Modernization Act of 2010. The GPRA requires agencies to engage in performance management tasks such as setting</p>

<p>proximity to the situation/victim was applicable.)</p>	<p>available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>performance metrics, measuring results, and reporting their progress.</p> <p>One GPRA performance indicator for the NHTH is to: <i>Increase the number of incoming communications received from victims and survivors of human trafficking by the Hotline.</i> OTIP requires signal proximity data in order to assess progress toward this goal.</p> <p>The grantee is already providing data on signaler proximity to the situation or victim in their year-end, annual report. OTIP is requesting to continue receiving this information at the same reporting frequency. <b>OTIP suggests retaining this data element.</b></p>
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### Potential Trafficker Data

Original Data Element	Proposed Change	Justification
<p>Potential Traffickers Identified</p> <p>(Record the number of potential traffickers identified by the close of the reporting period.)</p>	<p>Information on number of potential traffickers and suspicious businesses is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p><b>OTIP suggests removing these data elements in accordance with the public comment received to reduce burden.</b></p>
<p>Suspicious Businesses Identified</p> <p>(Record the number of suspicious businesses identified by the close of the reporting period.)</p>		

### Potential Victim Trafficking Experience Data

Original Data Element	Proposed Change	Justification
<p>Risk Factors/Vulnerabilities</p> <p>(Record the total number of potential victims for whom a particular risk factor or vulnerability was logged by the close of the</p>	<p>Information on risk factors/vulnerabilities, recruitment tactic, and exploitation venue/industry is produced by analysis outside of the NHTH when resources are</p>	<p><b>OTIP suggests removing these data elements in accordance with the public comment received to reduce burden.</b></p>

reporting period.)	available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.	
<p>Recruitment Tactic</p> <p>(Record the total number of potential victims for whom a particular recruitment tactic was logged by the close of the reporting period.)</p>	<p>Information on risk factors/vulnerabilities, recruitment tactic, and exploitation venue/industry is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	
<p>Exploitation Venue/Industry</p> <p>(Record the total number of potential victims whose trafficking situation took place in each venue/industry during the reporting period.)</p>	<p>Information on risk factors/vulnerabilities, recruitment tactic, and exploitation venue/industry is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.</p>	<p>Research shows that workers in particular venues or industries are more vulnerable to exploitation and trafficking, including agriculture, construction, electronics manufacturing, mining, fishing, forestry, hospitality, housekeeping and janitorial services, textile and apparel manufacturing, transportation, and warehousing. Recruitment strategies, exploitation tactics, and victim profiles vary by the type of trafficking experienced and the venue/industry where the trafficking situation took place. The NHTH is the only human trafficking hotline national in scope and is one of the only entities maintaining data on the trafficking situations that individuals in the United States experience. OTIP suggests retaining this data element to inform victim identification efforts and other prevention efforts.</p> <p>The grantee is already providing data on exploitation venue/industry in their year-end, annual report to our office. OTIP is requesting to continue receiving this information at the same reporting frequency. <b>OTIP suggests retaining this data element.</b></p>