Responses to Public Comment: November 29, 2021

- 1. The project protocol, including:
 - a. Why this research population was selected and how respondents are to be recruited.

On February 25, 2020, the Office on Trafficking in Persons (OTIP) specified five priority industries for consideration in this study: direct care work, childcare, animal husbandry, construction, and illicit activities through forced labor among gang-involved youth. After a systematic and comprehensive review of prior human trafficking prevalence studies and consideration of the feasibility of sampling within the priority areas listed above, it was decided that this study use traditional probability sampling and link-tracing sampling methodologies to estimate the prevalence of labor trafficking victimization in the construction industry. The report summarizing those recommendations is available for download: https://www.acf.hhs.gov/opre/report/human-trafficking-policy-and-research-analysis-project-comprehensive-review-prior

The contractor, RTI International, plans to recruit current workers from construction sites and current/former workers through workers' social networks. The research team will use probability (i.e., time-location sampling) and network referral sampling to identify a representative sample of workers to participate in the survey. A time location sampling design will be used to recruit current workers from construction sites. A network sample, either respondent-driven sampling or Vincent Link-Tracing Sampling, will also be used to recruit individuals who have worked in construction in the past 24 months.

b. Arrangements, if any, for privacy and confidentiality, and conditions under which individual respondents or personally identifiable responses would be disclosed to other than project personnel.

Information collected will be kept private to the extent permitted by law. 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. In addition to project-specific training about study procedures, members of the data collection team will receive training that includes general security and privacy procedures. 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. Due to the sensitive nature of the research, the study will obtain a Certificate of Confidentiality to help assure participants that their information will be kept private to the fullest extent permitted by law. Prior to initiating contact with potential participants, study approval will be received from the RTI Institutional Review Board (IRB). Individual respondents or personally identifiable responses will not be disclosed to other than project personnel.

c. The proposed English-language consent form.

A draft is attached.

2. A statement of whether this project was evaluated and approved by an Institutional Review Board, and if so which Board.

No, the project has not yet received IRB approval. The project will be reviewed by the RTI IRB.

3. The agency's justifications for this project.

Human trafficking casts a wide net of harm, negatively affecting individuals, families, public safety, the healthcare system, and the criminal legal system. Stakeholders, including policymakers, service providers, health care providers, law enforcement officers, and courtroom actors, involved in anti-trafficking efforts need data to inform their responses to human trafficking within their communities. A critical first step towards mobilizing efforts that best serve trafficking victims involves a better understanding of the scope and nature of the problem. However, calculating an estimate of human trafficking victims has proven to be a difficult and monumental task. There is growing recognition that it is necessary to improve the methodologies used to generate such estimates, a task that was even called for in a January 2020 Executive Order Combating Human Trafficking and Online Child Exploitation in the United States (Executive Order 13903, 2020). The goal of this study is to advance knowledge of promising methods for estimating human trafficking prevalence.