

**To:** Jordan Cohen  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Vera J. Soto, MPA, Research and Data Collection Analyst  
Office on Trafficking in Persons  
Administration for Children and Families (ACF)

**Date:** May 3, 2022

**Subject:** NonSubstantive Change Request – Look Beneath the Surface (LBS) Campaign  
Stakeholder Feedback Interviews (OMB #0970- 0531)

---

This memo requests approval of nonsubstantive changes to the approved information collection, Look Beneath the Surface (LBS) Campaign Stakeholder Feedback Interviews (OMB #0970-0531).

### ***Background***

Human trafficking is a significant public health issue that affects individuals, families, communities, and industries, and whose impact can span generations. Each year, individuals in communities across the United States are compelled to work or to engage in commercial sex through force, fraud, or coercion. OTIP serves a unique role in the federal response to human trafficking by providing resources to inform a public health framework for preventing and responding to human trafficking through its *Look Beneath the Surface (LBS)* Anti-Trafficking campaign.

To inform campaign development and ensure that the LBS campaign and related materials are as useful and relevant as possible, OTIP is conducting qualitative market research interviews with users and stakeholders of LBS campaign materials. This is an active, approved Gen IC for formative research (approved April 4, 2022; ICR Ref No. 202202-0970-008).

OTIP and their contractor, the Schatz Strategy Group, sent the initial invitation to participate in *LBS Campaign* interviews on April 4<sup>th</sup>, 2022 to approximately 46 professionals within **Audience 2** under this collection. Six of these individuals declined, four of whom explicitly cited compensation concerns, 22 have not responded, and 18 have agreed to participate. Based on responses received from potential interviewees and high non-response rate, OTIP has significant concerns about participation rates and non-response bias.

To address these concerns, OTIP is seeking approval to offer the subject matter expert respondents engaged through this collection with a token of appreciation for their participation in the one-hour interview. Specifically, OTIP is seeking to provide respondents within **Audience 2: Professional audiences that interact with those who have experienced or may be at risk of experiencing trafficking** with a \$50 token of appreciation.

Receiving approval to provide those individuals who have already consented to participate in an

interview with a token of appreciation, and letting other potential respondents know that a token of appreciation will be provided is important as it will increase participation in this collection, allowing OTIP to hear from a varied group of respondents to ensure the LBS campaign accurately addresses the needs of a diverse group of potential users.

### Diversity in Perspectives and Response Rate

Leading practices for developing human trafficking-specific outreach and awareness campaign materials, call for “accurate and diverse stories in marketing, branding, and communication.” Agencies should take precautions to avoid perpetuating harmful cultural stereotypes. For example, “labor trafficking does not always involve migrant farmworkers from Central America, and child trafficking does not always occur to children from Southeast Asia. Organizations have the power to change public perception with more culturally sensitive and responsive narratives of trafficking.”<sup>1</sup> Engaging allied professionals who have a diverse range of experiences and perspectives will result in *LBS Campaign* materials that accurately reflect current social and cultural contexts that compose and foster demand for services from trafficked persons.<sup>2,3,4</sup> Failing to provide a token of appreciation for the unique population of allied anti-trafficking practitioners we are seeking to engage will meaningfully increase response bias and may impact the quality of the information that is ultimately reported.

### ***Overview of Requested Changes***

OTIP is not proposing any changes to the LBS interview guides, target audiences, or other substantive elements of the collection. OTIP is requesting approval to provide a \$50 token of appreciation to respondents within ***Audience 2*** who will be offering their time and expertise to participate in the one-hour LBS interviews.<sup>5</sup> We have updated the supporting statement to include justification in section A9.

### ***Time Sensitivities***

The contractor’s (Schatz) period of performance to conduct market research, subject matter expert interviews, and synthesize findings and recommendations ends in September 2022. The contractor is awaiting further guidance pertaining to whether a token of appreciation can be provided to potential respondents.

---

<sup>1</sup> Human Trafficking Leadership Academy Cohort 2017 (2017). Survivor-informed practice: Definition, best practices, and recommendations from the Human Trafficking Leadership Academy, 2017. National Human Trafficking Training and Technical Assistance Center. Retrieved from <https://www.acf.hhs.gov/otip/resource/htlasipractice>.

<sup>2</sup> Aronowitz, A. A., & Koning, A. (2014). Understanding Human Trafficking as a Market System: Addressing the Demand Side of Trafficking for Sexual Exploitation. *Revue Internationale de Droit Penal/International Review of Penal Law* 85(3–4): 669–696.

<sup>3</sup> Cyrus, N., & Vogel, D. (2015). *Demand Arguments in Debates on Trafficking in Human Beings: Using an Historical and Economic Approach to Achieve Conceptual Clarification*. DEMAND-AT Working Paper, 1.

<sup>4</sup> Vogel, D. (2017). The Concept of Demand in the Context of Trafficking in Human Beings. *Psychosociological Issues in Human Resource Management* 5(1): 193.

<sup>5</sup> Bureau of Labor Statistics (BLS) 2021 Wage Data for 11-9151 Social and Community Service Managers indicate that the mean hourly wage for these professionals is \$36.92. Because certain respondents within ***Audience 2*** may be individuals with lived experience who are being engaged in their professional capacity, OTIP is seeking to provide a token of appreciation that is slightly higher (\$50) than the mean hourly wage for Social and Community Service Managers. An hour of an expert consultant’s time is valued between \$100 and \$150.