

Look Beneath the Surface (LBS) Campaign Stakeholder Feedback Interviews

Formative Data Collections for Program Support

0970 - 0531

Supporting Statement

Part A - Justification

April 2022

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to collect feedback about the *Look Beneath the Surface (LBS)* campaign.

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.

Necessity

The perspective of individuals who use or may seek out information about human trafficking and benefits, resources, and services available for individuals who have experienced human trafficking—information provided by campaigns like *LBS*—is critical to developing campaign materials that are appropriate and responsive.

To inform campaign development and ensure that the *LBS* campaign and related materials are as useful and relevant as possible, OTIP is proposing to conduct qualitative market research interviews with users and stakeholders of *LBS* campaign materials. Timely feedback is important to make sure the campaign and related materials reflect current understandings of, and trends in human trafficking, as well as current resource needs. As such, we are requesting approval under ACF's umbrella generic clearance for formative data collections for program support (0970-0531).

This collection meets the goal of this umbrella generic to collect information to understand ways ACF can better support programs and those served by the programs by learning about their needs and perspectives. Feedback will be voluntary. The activities fit within the following example activities outlined in the umbrella generic:

- Development or refinement of program and grant recipient processes, and the development and refinement of communication systems.
- Development of learning agendas and research priorities.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Initiative Purpose and Data Collection Procedures

Overview of Purpose, Use, and Approach

The purpose of the proposed information collection is to solicit feedback from users and stakeholders of *LBS* campaign materials. Through qualitative interviews, OTIP can better understand how *LBS* campaign materials have been used in the past, how these materials have and have not been useful, and other perspectives on how these materials might be modified to be most responsive to the needs of key users and stakeholders. These insights will inform updates to existing *LBS* campaign materials, the larger *LBS* campaign strategy, and learning agenda/research priority actions related to primary prevention and demand reduction through communications and outreach.

HHS' first human trafficking public awareness campaign, Rescue and Restore, was first launched in April 2004 to support the implementation of the Trafficking Victims Protection Act (TVPA) of 2000, as amended. The goal of HHS' first public awareness campaign was to help communities identify and serve victims of trafficking. In its first five years, the Rescue and Restore campaign generated 200 million media impressions throughout the country with a focus on altering the media's coverage of human trafficking from solely an international problem to a domestic problem. The campaign provided guidance to reporters to promote victim confidentiality and to promote ethical communication. The design and impact of the campaign was recognized with more than 10 industry awards, including the prestigious Silver Anvil Award from the Public Relations Society of America. Building on the success of the Rescue and Restore campaign, HHS launched the *LBS* campaign in 2016. The original *LBS* campaign maintained the same goals from the earlier Rescue and Restore campaign, however, *LBS* centered a public health approach to responding to human trafficking. The original *LBS* campaign sunset in FY 2020.

Historically, anti-trafficking work has centered around secondary and tertiary interventions, rather than primary prevention. Secondary interventions are interventions that occur when trafficking is "recognized early" before "major health, social, or other negative outcomes" occur. These interventions are focused on removing individuals from exploitative situations and to alleviate and respond to "short-term" adverse impacts. Tertiary interventions occur when trafficking is recognized but significant harm has already occurred. These interventions focus on remedying harms experienced by trafficking survivors through legal or judicial actions, and through the provision of relevant supportive services to those directly impacted.¹ The new *LBS* campaign is novel in that it is primarily focused on primary prevention, or ways to prevent exploitation and harm from occurring in the first place. *LBS* will equip users and stakeholders with information about human trafficking, emphasizing methods to address vulnerability and expand protective factors, as well as information pertaining to secondary and tertiary interventions available for trafficking survivors.²

¹ Chisolm-Straker, M., & Chon, K. (2021). *The historical roots of human trafficking: Informing primary prevention of commercialized violence*. Springer.

² Ibid.

Revised, primary prevention-oriented *LBS* campaign materials will also inform larger efforts focused on reducing the demand for commercial sexual services and forced labor, consistent with Sec. 115 of Pub. L. No. 115-425, which calls on the Federal government to examine the role of demand reduction in preventing human trafficking or otherwise achieving the purposes of the Trafficking Victims Protection Act (TVPA) of 2000, as amended and the Justice for Victims of Trafficking Act. Demand reduction efforts understand human trafficking as a market system, driven by principles of supply and demand for services supplied by trafficked persons. Insights from interviews with key users and stakeholders of human trafficking related information and resources will inform OTIP’s understanding of the current social and cultural contexts that compose and foster demand for services from trafficked persons.^{3,4,5,6} This understanding is integral if *LBS* materials are to address current vulnerabilities and protective factors.

To inform the development of revised *LBS* campaign materials for key audiences, OTIP is proposing to interview two main types of respondents, as described below. Interviewees are not required to respond to any of the questions in the interview protocols. Interviews will elicit feedback on the following topic areas:

- Key audience’s understanding of human trafficking to identify gaps in knowledge and awareness, and to inform updates to existing *LBS* campaign materials.
- Perceptions of trafficking-specific information and resources to assess utility and usefulness, and to identify how and in what ways specific products should be updated.
- Identify desired messaging, channels, and formats for distributing information and *LBS* campaign materials.

The interview protocols are designed to address the following guiding questions:

- What do key audiences know about human trafficking, including risk factors, protective factors, grooming and recruitment tactics (e.g., messages, locations, schemes), misinformation, disinformation, and stigma related to human trafficking? What do they want to know?
- What barriers impede help-seeking for individuals at risk for trafficking or who have experienced trafficking? What information might reduce barriers to help-seeking?
- What barriers impede identification or reporting of trafficking situations? What information might increase identification or reporting of trafficking situations?
- What are current successful approaches in the development of public health campaigns on violence prevention, including human trafficking?

³ 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.

⁴ 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.

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

⁶ Hernandez, D. and A. Rudolph (2015). Modern Day Slavery: What Drives Human Trafficking in Europe? *European Journal of Political Economy* 38: 118-139.

- What risk factors (especially related to primary prevention) can OTIP or its partners influence via a public awareness campaign? Which are the most important and why?
- What do key audiences see as important goals or objectives for a campaign like *LBS*? What are the key messages the *LBS* campaign should communicate?

Audience 1: State, tribal, and local government employees, federal contractors, and grant recipients

Government employees are a primary customer segment for OTIP. This includes individuals who work to prevent trafficking at the state, tribal, and local levels. Note that federal employees are not included in the described respondents. OTIP also works closely with its grant recipients and contractors, including those who run the National Human Trafficking Hotline (NHTH) and the National Human Trafficking Training and Technical Assistance Center (NHTTAC). See Attachment A: Government Employees, Contractors, Grant Recipients Interview Guide for a list of potential questions for these respondents.

Audience 2: Professional audiences that interact with those who have experienced or may be at risk of experiencing trafficking

OTIP designs materials for professional audiences that interact with individuals who have experienced or may be at-risk of experiencing human trafficking. This includes health and behavioral healthcare providers, social service professionals, child welfare system workers, public health professionals, communication professionals, and other anti-trafficking advocates who specialize in public awareness, outreach, and training. See Attachment B: Professional Service Provider Audience Interview Guide for a list of potential questions for these respondents.

Project Design

OTIP has contracted with the Schatz Strategy Group (Schatz) who will gather insights from representatives of these two target audiences through up to 77 facilitated conversations. Interviews will be conducted by a professional moderator. Interviewees will be asked to respond to specific questions in audience-specific discussion guides. Interviewees will be shown existing campaign materials during the interview to inform the feedback discussions.

OTIP maintains working relationships with subject matter experts and will invite individuals in its network to participate in this collection. Potential participants will receive information about the collection via phone or email and will be invited to participate in an interview. Other potential respondents may be referred by individuals in OTIP's network and via Internet searches for individuals who work for or are affiliated with organizations in relevant fields.

If individuals consent to participate, Schatz will schedule an appropriate time for the conversation and conduct the interview. With the interviewee's consent (obtained verbally) an audio recording will be made to assist in notetaking. All interviews will be conducted online via

Zoom or a similar platform. Schatz will prepare detailed notes from each session to assist in reporting. Data will be analyzed thematically for patterns in feedback observed across interviews and for any other major findings that may help to address formative research questions.

Schatz will prepare a short report (two to three pages in length) for OTIP that details high-level findings within three business days of completing the final interview within each respondent category. Findings from all interviews will be included in a full market research report, which will include final audience assessments and detailed content recommendations for the *LBS* campaign. This final report is for ACF's internal planning purposes, but will inform the *LBS* campaign materials, which will be made public after a period of peer-review by expert consultants with lived experience.

A3. Improved Information Technology to Reduce Burden

Interviews will take place in a virtual setting via a conference call platform that allows for screen sharing. Screen sharing will allow respondents to review existing campaign materials, as a means to contextualize their comments. Allowing individual interviews to take place virtually will reduce the burden of participation.

A4. Efforts to Identify Duplication

OTIP has not identified any similar efforts to obtain and document the reflections of allied professionals in a way that could directly inform *LBS* campaign materials.

A5. Involvement of Small Organizations

OTIP will be conducting interviews with representatives of non-governmental organizations (NGOs), as well as health and behavioral healthcare providers, social service professionals, child welfare system workers, and public health professionals who may work for small businesses or other small entities. These interviews will take place with audiences who can participate during normal business hours as a part of their typical workday. Many of these audiences work closely with OTIP.

A6. Consequences of Less Frequent Data Collection

Public awareness and outreach campaign materials must be current, evidence-based, and culturally and linguistically appropriate in order to be useful for key audiences. This is a single, point-in-time collection to gather feedback from OTIP customers to inform the development of the updated *LBS* campaign materials.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

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 the overarching generic clearance for formative information collection. This notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. A subsequent notice provided a thirty-day period for public comment. This notice was published on December 28, 2020, Volume 85, Number 248, page 84343, and provided a thirty-day period for public comment. During the notice and comment periods, no substantive comments were received.

Consultation with Experts Outside of the Study

No experts outside of the initiative have been consulted.

A9. Tokens of Appreciation for Respondents

OTIP recommends providing respondents within **Audience 2** with a \$50 token of appreciation for their participation in the one-hour interview. This token of appreciation reflects OTIP's commitment to recognizing respondents' time and effort to respond, and may also offset the incidental costs of their participation, such as arrangement of child care or transportation.

While not always appropriate for federal information collections, there are instances when providing a token of appreciation for participation in a federal information is appropriate because it can contribute to response rates and information quality. For example, it's common for focus group and interview participants to be offered a token of appreciation (usually \$40 to \$75, consistent with general federal government practice).

Through this collection, OTIP is seeking the time and expertise of professionals who serve survivors of trafficking. Providing a token of appreciation for the unique population of allied anti-trafficking practitioners we are seeking to engage will meaningfully increase response rates and may the quality of the information that is ultimately reported. Thus, OTIP proposes a \$50 token of appreciation for respondent participation in the one-hour interview.⁷

⁷ 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. However, 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. By comparison, an hour of an expert consultant's time is valued between \$100 and \$150.

A10. Privacy of Respondents

Interviews will be conducted by an independent third-party contractor (Schatz). OTIP will have access to the contact information for the survivor expert consultants and allied professionals with whom we maintain working relationships, but findings will be reported in the aggregate and no comments will be attributed to individuals by name. Schatz will obtain oral consent from each participant at the start of the interview, including permission to audio record the interview. No personally identifiable information will be collected as part of the interview questions.

Schatz will produce notes from each interview using the recordings; recordings will be destroyed at the conclusion of the project. OTIP will not have access to the recordings or to individual interview notes. Schatz will summarize findings at the group level to share with OTIP (e.g., industry or individuals with lived experience). Participants will be advised that their participation is optional, that they do not need to answer all questions, and that they may terminate the interview at any time.

All respondents will be informed of the following prior to their participation in any interview:

“Thank you for agreeing to speak with me today. I’m [insert name], and I will facilitate our conversation. I am collecting information on behalf of the Office on Trafficking in Persons (OTIP) at the U.S. Department of Health and Human Services to improve public awareness and outreach materials and understanding of human trafficking. Participating in this interview is voluntary; you may end the interview at any time or choose not to answer any question. I will be recording today’s call so that I can capture notes from our discussion. These recordings are not shared outside our research team, and are destroyed once our notes are complete. We write a report about what we heard, but we combine our findings across all interviews. Your feedback is private. Nothing you say will be attributed to you by name, unless you specifically direct otherwise. I am an independent researcher, so I am not an expert on this topic. My job is to hear your honest feedback. There are no wrong answers; any feedback you have is helpful for me. A \$50 token of appreciation will be provided for your participation. May I start the recording?”

A11. Sensitive Questions

Feedback will be voluntary. Despite the sensitivity of the subject matter (human trafficking), all interview questions have been carefully crafted to elicit feedback on specific public awareness and outreach campaign informational products and resources, rather than specific details about any individual’s lived experience or other particularly sensitive concerns. For example, we might ask a case manager who provides services for individuals with lived experience about what services survivors required after exiting their trafficking experience in order to get at the larger question, “did you or your client know where to go for information about your client’s rights and the kinds of benefits/services/resources available to them?” or “what precluded you or your client from being able to access those benefits/services/resources?” and if it was a communications matter (i.e. the respondent indicates that they did not know where to find the information, did not know how to navigate directories of service providers, did not know their

client’s labor/immigration rights, etc.) we will seek to address these information gaps through revised *LBS* campaign materials. All respondents will be informed of the proposed uses of the information they share, that their information will be kept private, that they do not have to answer any questions they do not feel comfortable responding to, and that they can end the interview at any time. All questions are aimed at soliciting feedback on how *LBS* campaign materials can be improved to better meet the needs of each key audience or respondent type.

A12. Estimation of Information Collection Burden

Total Burden Requested Under this Information Collection

Potential participants will be contacted via phone or email and invited to take part in the project. If they consent, they will be scheduled for a 60-minute interview at a time of their choosing and sent a meeting link (e.g., via Zoom) to access the conversation. No pre-work or post-work is required; participation is limited to the 60-minute conversation. There is no separate screening process.

Instrument	Total Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
<i>Look Beneath the Surface (LBS) Campaign Stakeholder Feedback Interviews:</i> Government Employees, Contractors, Grant Recipients	26	4	1	104	54.14	5,630.56
<i>Look Beneath the Surface (LBS) Campaign Stakeholder Feedback Interviews:</i> Professional Service Provider Audiences	51	4	1	204	54.14	11,044.56
Estimated Annual Burden Total				308	54.14	16,675.12

Total Annual Cost

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) May 2020 National Occupational Employment and Wage Estimates mean hourly wage for All Occupations [00-0000], which is \$27.07. To account for fringe benefits and overhead the rate was multiplied by two which is \$54.14. The estimated annual cost to respondents for an estimated total burden of 308 hours is \$54.14 times 308 hours or \$16,675.12.

https://www.bls.gov/oes/current/oes_nat.htm

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents or recordkeepers.

A14. Estimate of Cost to the Federal Government

The estimated annual cost to the Federal government is \$6,241.62.

Findings from these individual interviews will be reviewed by OTIP Project Officers and salaried staff to inform revisions to *LBS* Campaign Materials. The cost to the federal government was calculated using the most current Bureau of Labor Statistics (BLS) wage data (May 2020) for job code [13-1198] Project Management Specialists and Business Operations Specialists. The mean hourly rate of Project Management Specialists and Business Operations Specialists is \$40.53. The estimated annualized total cost to the government is \$6,241.62, which reflects 154 hours (roughly 2 hours of review per individual interview) times \$40.53.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

The Contractor, with the assistance of the Government, will begin scheduling facilitated conversations following OMB approval. Contractor will provide an internal research report with relevant findings to inform campaign development to OTIP by June 2022.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.