

Measuring Human Trafficking Prevalence in Construction: A Field Test of Multiple Estimation Methods

OMB Information Collection Request
New Collection

Supporting Statement Part A

MARCH 2022

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officer:
Mary G. Mueggenborg
Kelly Jedd McKenzie

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a new data collection. We are requesting 2 years of approval.
- **Description of Request:** This request is for a one-time survey of construction workers in one U.S. geographic location. Study findings will be used to inform future prevalence estimation research as well as policy, programs, and practices intended to prevent, identify, and respond to labor trafficking in the construction industry. The survey will be administered to construction workers in Houston, Texas. This study is not intended to promote statistical generalization to other sites or industries. We do not intend for this information to be used as the principal basis for public policy decisions.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A1. Necessity for Collection

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).

To advance knowledge of promising methods for estimating human trafficking prevalence, the Office of Planning, Research, and Evaluation (OPRE), in collaboration with the Office on Trafficking in Persons (OTIP), within the Administration of Children and Families (ACF) at the U.S. Department of Health and Human Services seeks Office of Management and Budget (OMB) approval for a one-time survey of construction workers in one U.S. geographic location. OPRE has contracted with RTI International to conduct this information collection.

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

A2. Purpose

Purpose and Use

The information collection is for the purpose of research that will potentially be used to inform future prevalence estimation research as well as policy, programs, and practices intended to prevent, identify, and respond to labor trafficking in the construction industry. This project will give rise to several topical briefs that can inform the field. Final topics will be selected in a later stage of the study in coordination with OPRE and OTIP, however, potential topics include: a know-your-rights brief or infographic targeting the construction worker community and focused raising awareness about vulnerabilities to labor exploitation and labor trafficking in the construction industry with information about local and national resources for support; a brief summarizing study findings tailored for community-based advocacy organizations, government organizations, and private-sector procurement professionals in the disaster response and construction industry spaces ; a methods brief with a reflective summary of the challenges and benefits of the various sampling methods that we utilized in this study; labor exploitation and trafficking following natural disasters; and other topics that emerge throughout the study.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker, and is not expected to meet the threshold of influential or highly influential scientific information.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Research Questions

The primary and sub-research questions for this study are outlined in **Tables 1a and 1b**.

Table 1a. Research Questions (RQs): Construction Worker Survey

RQ1: How do the number and characteristics of construction workers who self-reported exploitation and trafficking experiences compare by prevalence estimation strategy?	
RQ1a	How many and what percentage of construction workers in the study site have experienced labor exploitation and trafficking?
RQ2: What is the nature and type of exploitation experienced by construction workers?	
RQ2a	What types of exploitation were experienced by construction workers during recruitment (e.g., coercion, deception, fees)?
RQ2b	What types of exploitative employment practices and penalties were experienced by construction workers (e.g., pay withheld, made to perform additional services or responsibilities, unpaid overtime)?
RQ2c	How do employers treat the personal life and property of construction workers (e.g., control over a meaningful part of someone’s life, confiscation of mobile phones)?
RQ2d	What types of degrading conditions were experienced by construction workers?
RQ2e	To what extent was the freedom of movement or communication of construction workers restricted (e.g., identification documents confiscated, surveillance and monitoring)?
RQ2f	What forms of debt or dependency were experienced by construction workers?
RQ2g	What forms of violence (or threats of violence) were experienced by construction workers?
RQ3: What are the potential risk and protective factors associated with trafficking victimization?	
RQ3a	What individual-level factors (e.g., gender, national origin, English proficiency) differentiate construction workers who report trafficking experiences from other workers?
RQ3b	What employment characteristics (e.g., construction work during natural disaster recovery, type of construction work, length of employment in construction, methods for finding work in construction) differentiate construction workers who report trafficking experiences from other workers?

Study Design

The proposed information collection activity is a one-time survey with up to 4,200 adults who have worked in the construction industry in Houston, Texas in the 24 months prior to data collection. The construction worker survey will be offered to workers identified through two sampling strategies: (1) probability sample (i.e., time location sample) and (2) a network sample. The survey instrument used for individuals recruited through the two different sampling strategies will be primarily the same and includes questions focused on the individuals’ experiences with labor exploitation and trafficking; employment histories, including work after a natural disaster; social networks, and demographic data. The study design selected is intended to identify a representative sample of construction workers, which is important for estimating prevalence. Supporting Statement B provides more detail on the appropriateness of the design (section B1) and the study design (B2). **Table 2** provides an overview of the data collection efforts.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Table 2. Overview of Data Collection Efforts

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Construction Worker Survey	<p>Respondents: Adults who have worked in the construction industry in Houston, Texas in the 24 months prior to data collection.</p> <p>Content: Professional background (Section 1), work experiences of the respondent (Section 2), work experiences of the respondents' friends (Section 3), demographics (Section 4), questions for sampling (Section 5).</p> <p>Purpose: To estimate the prevalence of labor trafficking exploitation among construction workers in Houston, Texas.</p>	<p>Mode: Computer-Assisted Self-Interview</p> <p>Duration: 30 minutes</p>

Other Data Sources and Uses of Information

Federal agencies are encouraged to leverage existing administrative data as a means of increasing the utility of their research in a cost-efficient manner (OMB, 2014). This study will rely on the primary data collection described here because there are no existing administrative datasets to leverage.

A3. Use of Information Technology to Reduce Burden

The Construction Worker Survey will be programmed for Computer-Assisted Self-Interviewing (CASI). Compared with a paper-and-pencil instrument, CASI offers several features that make the survey more efficient, and thus less burdensome for the respondent, while also supporting data quality. First, CASI technology makes possible the self-administration of complex questionnaires with a level of accuracy that would otherwise not be feasible. CASI-programmed surveys implement complex skip patterns based on responses to gateway questions and to fill specific wordings based on answers previously provided by the respondent. Second, CASI technology provides greater expediency with respect to data processing and analysis. A number of back-end processing steps, including editing, coding, and data entry become part of the data collection process.

Respondents will also electronically sign all forms (e.g., informed consent) via the device they use to take the survey. As with CASI, this increased efficiency of the signature process reduces respondent burden.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

Several efforts were undertaken to identify existing data, reduce duplication, and minimize burden. A comprehensive review of prior human trafficking prevalence studies was conducted for this data collection effort (Barrick & Pfeffer, 2021). Two studies identified in this review included construction workers in their labor trafficking studies; however, both were more broadly focused on labor trafficking and simply captured these industries along with others. A website scan revealed no ongoing federal efforts to conduct research to understand labor trafficking victimization among construction workers. In addition, a dataset scan identified no federal data collection systems or surveys with the requisite data needed to answer questions related to prevalence of labor trafficking among construction workers. Thus, the information being collected through the Construction Worker Survey cannot be obtained through other sources. In addition, the study has been structured so that the findings will be included in a meta-analysis of several international human trafficking prevalence studies funded by the Prevalence Reduction Innovation Forum, a collaboration funded by the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons, to encourage standardization of measurement in prevalence research. The meta-analysis will leverage the data collected in each of the federally funded studies to further enhance the knowledge of promising methods for estimating human trafficking prevalence. This will increase the utility of this data collection activity and increase government efficiency in advancing knowledge of promising methods for human trafficking prevalence estimation.

A5. Impact on Small Businesses

This survey does not involve data collection from small organizations.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. 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 this information collection activity. This notice was published on November 22, 2021, Volume # 86, Number # 222, page # 66315, and provided a sixty-day period for public comment. During the notice and comment period, 2 comments were received, which are attached as Appendix C along with the response Appendix D.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Consultation with Experts Outside of the Study

The project team consulted with several experts external to the study team to inform the study design and data collection instrument. The selection of a study design was informed by the expertise of Sheldon Zhang, PhD, and Meredith Dank, PhD. Drs. Zhang and Dank are international experts on labor trafficking and are Principal Investigators on numerous domestic and international research studies focused on estimating the prevalence of human trafficking in different contexts. The study focus (i.e., construction industry) and methods were identified in consultation with Drs. Zhang and Dank in addition to subject matter experts on survey methodology and survey statistics. Dr. Kyle Vincent, a statistician with expertise in estimating the prevalence of human trafficking, has advised on the study design and methods and will lead data analysis. The data collection instruments were developed to align with the standardized trafficking indicators developed by the Prevalence Reduction Innovation Forum. After a careful review by two labor trafficking experts (Dr. Torres and Mr. Salgado), revisions were made to streamline the instruments, simplify and clarify wording, and increase variation in response options. Once programmed, the survey will be pre-tested (see Supporting Statement B, section B3).

Table 3. Expert Consultants

Expert Consultant	Affiliation	Consultation Domain
Kyle Vincent, PhD	Independent Researcher	Study design; statistical analysis
Stephanie Eckman, PhD	RTI International	Survey methodology; survey statistics
Marcus Berzofsky, PhD	RTI International	Survey methodology; survey statistics
Stephen Tueller, PhD	RTI International	Survey methodology; survey statistics
Sheldon Zhang, PhD	University of Massachusetts-Lowell	Overall study design; industry selected; instrument content; indicators of labor trafficking
Meredith Dank, PhD	John Jay College of Criminal Justice	Overall study design; industry selected
Renan Salgado	Worker Justice Center of New York	Instrument content; indicators of labor trafficking; construction workers
Melissa Torres, PhD	Baylor College of Medicine	Instrument content; indicators of labor trafficking; construction workers

A9. Tokens of Appreciation

Tokens of appreciation are needed to offset data costs of participation in data collection, such as cellular data used to access the survey or transportation to a neutral location to access the survey. They also serve to encourage participation among high-risk respondents, which is particularly important given the sensitive nature of the questions. Minimizing nonresponse is critically important for surveys like the Construction Worker Survey because it can bias the findings. For study findings to be representative, participation must be

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

secured from participants with wide-ranging characteristics and experiences, including those most at risk for labor exploitation and trafficking. Tokens of appreciation are also needed to encourage participants to recruit their peers to participate in the survey, which is critical to achieve the needed sample size for the network recruitment sample. To secure a representative sample of adequate size, tokens of appreciation will be offered to construction workers who complete the survey (\$50) and for each eligible individual they refer who completes the survey (\$15 per referral, with a maximum of 3 referrals). This amount is appropriate for this type of study and consistent with prior research on sensitive topics. If a smaller token is provided, it may lead to lower response rates, which can reduce the representativeness of the sample and bias the study findings. For example, the *National Survey on Drug Use and Health* has provided \$30 since 2001; however, it has experienced declining response rates since 2006. The referral structure has been used successfully in prior human trafficking prevalence estimation studies including RTI's current study, *Estimating Sex Trafficking in Sacramento County*, and a study on labor trafficking in San Diego, which included construction workers (Zhang et al., 2012, 2014). For example, Zhang and colleagues (2012) interviewed unauthorized immigrant workers between June 2010 and November 2011 to estimate the prevalence of labor trafficking. The sample started with only 18 initial "seed" participants, each of whom received 3 referral coupons worth \$10 each. This referral and recruitment approach resulted in a total of 826 completed interviews. Because the data collection occurred more than 10 years ago, the token of appreciation provided for referrals has been increased to \$15.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

A limited amount of personally identifiable information (PII) will be requested from respondents to the Construction Worker Survey, including first name (or nickname) and the last 4 digits of their phone number. The information will be used to trace social links among all survey respondents, which is necessary to estimate the prevalence of labor trafficking using a network sample. A subset of respondents will also be asked to provide a limited amount of PII on individuals they refer to complete the survey, including: (1) first name (or nickname), (2) the last 4 digits of their phone number, (3) gender, (4) age range, and (5) country of birth. The information will be linked to the survey responses and used to trace social links among all survey respondents, which is necessary to estimate the prevalence of labor trafficking using a network sample. They also will be given the option to provide their peers' phone number or email address, which will be used to invite them to participate in the survey. It may also be used to confirm the social links among survey respondents made through the fuzzy matching of first name and last 4 digits of a phone number. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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. As specified in the contract, RTI will comply with all Federal and Departmental regulations for private information.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

The consent form describes measures taken to assure participant privacy. These include assurances that the research team will protect the privacy of respondents to the fullest extent possible under the law, that respondents' participation is voluntary, and that they may withdraw their consent at any time without any negative consequences.

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 this research (see A.11 for more information), the study will obtain a Certificate of Confidentiality. The Certificate of Confidentiality helps to 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).

Data Security and Monitoring

As specified in the contract, RTI shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The project team will use its extensive corporate administrative and security systems to prevent the unauthorized release of information, including state-of-the-art hardware and software for encryption that meet federal standards and physical security that includes a keyless card-controlled access system on all buildings and local desktop security and account lockout via Microsoft Windows.

RTI has established data security plans for handling data during all phases of the data collection, as follows:

- Field staff tablets will be password protected and disk encrypted. There are several levels of password-protected access required to view the files on the tablets. Failure to provide a password at any of the levels denies access to the tablet's contents.
- Data will be transmitted and stored in a way that only members of the project team who are authorized and have need will have access to any identifying information. All project team members have been trained on data security procedures and have signed agreements that provide for termination of employment, civil suit, and financial and other penalties in case of violation. RTI field tablets and the data transmitted to and from the tablets are encrypted with Federal Information Processing Standard (FIPS) 140.2-compliant algorithms.
- All personnel working on the survey must sign affidavits pledging that the data they will collect or work with will not be disclosed. Penalties for disclosure include termination of employment and substantial financial fines.
- Access to project file shares, systems, and data is strictly controlled by role-based security in the form of Windows security groups. An individual's security group membership is determined based on the minimum necessary access to perform their job function on the project. Staff are only added to security groups after completing the Project Confidentiality Pledge and any required trainings on data security. Security group membership is audited quarterly by project leaders to ensure that only those who still need specified access continue group membership.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A11. Sensitive Information¹

Because the Construction Worker Survey focuses on labor exploitation and trafficking, it deals with several private and sensitive topics. This information is necessary to address the study's core research questions and are not reliably available from other sources. The survey includes potentially sensitive questions about, for example, exposure to violence, participation in illicit activities, and physical and cognitive disabilities. All study materials and procedures are in the process of being reviewed by the contractor's IRB (Federalwide Assurance #3331, effective until November 2023). After IRB approval, the research team will get a Certificate of Confidentiality and respondents will be informed of protections to privacy and potential limitations to that privacy.

Respondents are advised of the voluntary nature of participation and their right to refuse to answer any question during the informed consent process. Additionally, before the portion of the survey containing the most sensitive questions, respondents are reminded of the importance of their honest answers and assured that any information they provide will be kept private to the fullest extent permitted by law. After a participant completes the survey, the closing page will provide a list of community-based resources for people who have experienced labor exploitation or trafficking.

A12. Burden

Explanation of Burden Estimates

We estimate that up to 4,200 respondents could complete the one-time Construction Worker Survey.² On average, the survey is estimated to take 30 minutes to complete. Using a standard estimated time for question completion, the burden was calculated by averaging the time to complete the minimum and maximum number of survey items a respondent could be asked based on varying skip patterns. To

¹ Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

² Although likely response rate was used when calculating statistical power, the largest possible survey population size was used for burden estimate in order to be transparent regarding potential respondent burden.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage for each construction worker participant, according to June 2021 data available from the Bureau of Labor Statistics (BLS).³ The average hourly earnings for construction workers (NAICS 23) was used (\$32.86 per hour).

Estimated Annualized Burden and Cost to Respondents

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Construction Worker Survey	4200	1	0.5	2100	1050	\$32.86	\$34,503

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$1,670,950. Annual costs to the Federal government will be \$835,475 for the proposed data collection.

Cost Category	Estimated Costs
Field Work	\$1,277,785
Analysis	\$235,899
Publications/Dissemination	\$157,266
Total costs over the request period	\$1,670,950
Annual costs	\$835,475

A15. Reasons for changes in burden

This is a new information collection request.

A16. Timeline

Table 5 outlines the key time points for the study and for information collection, analysis, and reporting.

³ <https://www.bls.gov/iag/tgs/iag23.htm>

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Table 5. Plan and Time Schedule for Information Collection, Tabulation, and Publication

Project Activity	Time period
Data collection	12 months, following OMB approval
Data analysis	12 months, following data collection
Final report and other publications	About 3 months after completion of data analysis

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: Construction Worker Survey

Appendix A: Recruitment Script for Construction Workers

Appendix B: Consent Form

Appendix C: Public Comments

Appendix D: Public Responses

References

Barrick, K. & Pfeffer, R. (2021). *Human Trafficking Policy and Research Analyses Project: Comprehensive review of prior prevalence studies and recommendations for field testing in the United States*, OPRE Report No. 2021-87, Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

Zhang, S.X. (2012). Looking for a Hidden Population: Trafficking Migrant Laborers in San Diego County. Final Report submitted to the National Institute of Justice.

Zhang, S.X., Spiller, M.W., Finch, B.K., & Qin, Y. (2014). Estimating labor trafficking among unauthorized migrant workers in San Diego. *The Annals of the American Academy of Political and Social Science*, 653, 65-86.