Domestic Victims of Human Trafficking (DVHT) Program Data

OMB Information Collection Request
0970 - 0542

Supporting Statement Part A - Justification

October 2022

Summary

This request is for an extension with changes to an approved and ongoing data collection under Office of Management and Budget (OMB) Control Number 0970-0542. Current OMB approval of the collection expires on March 31, 2023. Minor updates have been made to performance indicators under this collection in consultation with existing grant recipients and stakeholders, to reduce respondent burden and strengthen privacy and confidentiality. A currently approved form under this collection, the Domestic Victims of Human Trafficking Spending Form, was renamed to Categories of Assistance and the categories have been simplified to reduce reporting burden.

1. **Circumstances Making the Collection of Information Necessary**

   The Trafficking Victims Protection Act of 2000 (TVPA), as amended, authorizes the Secretary of Health and Human Services (HHS) to expand benefits and services to victims of severe forms of trafficking in persons in the United States (U.S.), without regard to their immigration status. The TVPA also authorizes HHS to establish and strengthen programs to assist United States citizens and lawful permanent residents who have experienced sex trafficking or severe forms of trafficking in persons (22 U.S.C. § 7105(f)(1)).

   Acting under a delegation of authority from the Secretary of HHS, the Administration for Children and Families (ACF) awards cooperative agreements to organizations to establish a program to assist U.S. citizens and lawful permanent residents who have experienced human trafficking, the Domestic Victims of Human Trafficking (DVHT) Program. The DVHT Program is inclusive of two distinct programs: the Domestic Victims of Human Trafficking Services and Outreach Program (DVHT-SO), and the Demonstration Grants to Strengthen the Response to Victims of Human Trafficking in Native Communities Program (VHT-NC). Through the DVHT Program, grant recipients provide comprehensive case management to domestic survivors of human trafficking in traditional case management and Native community settings.

   This is an existing collection that is necessary to measure grant project performance, provide technical assistance to grant recipients, assess program outcomes, inform program evaluation, respond to congressional inquiries and mandated reports, and inform policy and program development that is responsive to the needs of victims. Information from this collection also enables the ACF Office of Trafficking in Persons (OTIP) to fulfill a provision in the TVPA of 2000, as amended, that requires the Attorney General to submit annually "a report on Federal agencies that are implementing any provision of this chapter" (22 USC 7103(d)) and to prepare a required annual report to Congress on U.S. Government activities to combat trafficking that is prepared by the U.S. Department of Justice. Congress requires HHS and other appropriate Federal agencies to report, at a minimum, information on the number of persons who received benefits or other services under 22 USC 7105(b)(f), in connection with programs or activities funded or administered by HHS.

This request is to extend approval with changes to an ongoing data collection under OMB Control Number 0970-0542. The proposed changes are intended to reduce respondent burden and strengthen privacy and confidentiality. An overview of changes is provided in A15.

2. **Purpose and Use of the Information Collection**

The main purpose of this information collection is to improve OTIP's monitoring of grant recipients providing services to domestic victims of a severe form of trafficking in persons, and to assess the extent to which grant recipients are meeting required program activities to:

1. Provide comprehensive, culturally and linguistically responsive case management and victim assistance to domestic victims of human trafficking, including Native American victims, who have experienced labor and/or sex trafficking;
2. Conduct outreach efforts to increase identification of domestic, including Native American, victims of sex and/or labor trafficking, and;
3. Deliver training for service providers and community partners on effective identification, assessment, trauma-informed service delivery strategies, and referral.

The information obtained through this collection will allow OTIP to evaluate service delivery efforts, inform prevention programming, and monitor program outcomes. Additionally, this information will enable OTIP to understand and disseminate insights related to human trafficking cases and trends to inform anti-trafficking strategies and policies. The information collected is also used to prepare a required annual report to Congress and the annual Attorney General's Trafficking in Persons Report, as noted previously.

3. **Use of Improved Information Technology and Burden Reduction**

DVHT grant recipients have historically submitted information under this collection via structured, macro-enabled Excel workbooks. Beginning in FY 2021, HHS strengthened its security posture, no longer allowing macro-enabled workbooks for use, which increased the level of manual data entry required by grant recipients. Previously, OTIP staff needed to manually extract and process grant performance reporting data contained within the spreadsheets that grant recipients upload as an attachment to the Performance Progress Report (PPR) within GrantSolutions.gov, a cumbersome process that is time consuming for OTIP staff and grant recipients.

OTIP built and, as of September 2022, deployed the Anti-Trafficking Information Management System (ATIMS) for grant recipients to manage client and programmatic information required under the DVHT program. ATIMS allows OTIP to better monitor grant performance, eases the reporting burden for grant recipients, enables robust analytics, and supports OTIP's HHS Certification and Eligibility processes through a separate, now integrated module, the Shepherd Case Management System. The data collection system provides for increased quality controls such as structured, multi-select reporting options, as well as tooltips, to define key terms and definitions within the system user interface. The

ATIMS system reduces the amount of manual data entry, easing the burden of reporting on grant recipients and increasing the accuracy and overall quality of the data submitted. ATIMS also provides grant recipients with real-time analytics pertaining to their awards and performance, so that recipients may track their progress towards targets.

4. **Efforts to Identify Duplication and Use of Similar Information**

The data to be collected relates to the OTIP grants to implement the DVHT Program. As required under the funding opportunity, recipients must describe how DVHT Program funds will complement and not duplicate existing anti-trafficking efforts and services in the proposed geographic area. If the recipient is receiving other federal funds to implement a human trafficking program, the recipient is required to provide the name of the awarding federal agency, the name of the grant, the project period, the amount they currently receive, and will be expected to ensure any funds awarded through the DVHT Program will not be used to supplant or augment any other related federal funding. Because participants assisted by these grants will not concurrently be assisted by another federal program, OTIP is the only agency to collect this information, and there is no duplication.

5. **Impact on Small Businesses or Other Small Entities**

Not applicable.

6. **Consequences of Collecting the Information Less Frequently**

The information collected on clients enrolled in the DVHT program is submitted on a quarterly and annual basis to monitor grant recipient performance throughout the fiscal year as outlined in the Notice of Funding Opportunity. Grant recipients are required to demonstrate progress towards achieving grant project activities and a less frequent collection would impede the project officer's ability to assess grant performance and weaken the analysis used during the annual non-competing continuation application process to award funding for these cooperative agreements. Further, information obtained under this collection informs OTIP's ability to provide timely responses to congressional and other ad hoc requests pertaining to federal efforts to serve domestic victims of a severe form of trafficking in persons, as well as the annual Attorney General's Trafficking in Persons Report.

7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Not applicable.

8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

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 July 27, 2022, Volume 87, Number 143, pages 45107-45108, and provided a sixty-day period for public comment. OTIP did not receive comments.

Consultation

OTIP engaged its existing grant recipients providing services to domestic victims of trafficking in persons to discuss their views on feasibility and relevance of the requested data, frequency of collection, and the reporting format to gather feedback for the purposes of ATIMS development, and to identify ways to reduce the overall reporting burden. Grant recipients highlighted the importance of requesting only that information, which is necessary for OTIP to oversee case management, ensure quality service provision, and monitor recipients' fulfillment of objectives under their awards, given large caseloads and capacity constraints. Grant recipients also highlighted the level of rapport clinicians and case managers need to obtain certain pieces of information from clients (as related to their trafficking experiences, trauma histories, and varying service needs). To the maximum extent practicable, OTIP incorporated this feedback into the collection by removing data elements that did not directly inform OTIP's monitoring activities, by collapsing certain data elements for simplicity, and by embedding grant recipients' feedback pertaining to ATIMS mock-ups into the user interface/experience (Ui/Ux) within the system (see section 3).

OTIP also leveraged best practices in service delivery as identified by the National Human Trafficking Training and Technical Assistance Center (NHTTAC) and NHTTAC's Human Trafficking Leadership Academy (HTLA), as well as existing research examining the trafficking experiences of particular demographic groups, to update certain data elements and field values to bring those elements and values into alignment with best practice. For example, OTIP removed the 'Screening Tools Used' outreach indicator, recognizing that practitioners may use a series of screeners, or conduct screenings over multiple points of contact with clients, to obtain information needed to coordinate case response and service delivery, and this information was not necessary for OTIP's monitoring purposes. Other examples include removing the indicator 'Trafficker's Relationship to Victim' as this information was not frequently known by recipients or reported by clients, changing 'LGBTQ2S+' to '2SLGBTQIA+' for consistency with the term used by practitioners in the field, and updating the gender identity categories to mirror those proposed by National Academies of Science, Engineering, and Medicine (NASEM)'s 2022 report, Measuring Sex, Gender Identity, and Sexual Orientation).

9. **Explanation of Any Payment or Gift to Respondents**

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Grant recipients under this program are required to submit a protocol, inclusive of relevant organizational policies and procedures, to prevent disclosure of confidential, private, or personally identifiable information concerning clients or their immediate family members without informed, written, and reasonably time-limited consent from the person whose information is sought. The protocols must also include the plan for how the DVHT-SO Program prime recipient, and if applicable, the subrecipient(s) will inform clients of the limits to confidentiality prior to disclosures (e.g., mandated reporting requirements, etc.). DVHT-SO Program prime recipients must ensure compliance with 45 CFR § 75.303(e) to take reasonable measures to safeguard a client's protected personally identifiable information. The protocol must also include a plan for how protected personally identifiable information and other information that is considered sensitive, consistent with applicable federal, state, local and tribal laws regarding privacy and obligations of confidentiality, will be collected and safeguarded. Grant recipients must provide the methods and/or systems that will be used to ensure that confidential and/or sensitive information is properly handled and if applicable, address the process for subrecipient(s) and/or contractors, as well as a plan for the disposition of such information at the end of the project period, as a condition of their awards. Each grant recipient's confidentiality agreements/privacy disclosures explain what information will be shared through routine reporting to the funding organization (OTIP) for analysis, assessment of the program's success, congressional reporting, evaluation, and research. The grant recipients provide the information collected from their subrecipients sharing a system generated client identifier in lieu of personally identifiable information such as the client's name or social security number.

11. Justification for Sensitive Questions

OTIP has received inquiries and direction from anti-trafficking stakeholders, including the U.S. Advisory Council on Human Trafficking, to collect data on specialized populations who disproportionately experience human trafficking or may be at risk, including individuals with disabilities and those who identify as lesbian, gay, bisexual, transgender, or queer. Research shows that lesbian, gay, bisexual, transgender, queer (or questioning), Two-Spirit, and other (LGBTQ2S+) persons, as well as Black, Latinx, and Native American individuals are disproportionately likely to experience trafficking in persons and other forms of abuse and exploitation. Men and boys are also under-identified among this victim population, particularly non-heterosexual men and boys who have experienced sex trafficking.

Based on broad consultation with existing grant recipients providing services to domestic victims of trafficking in persons, best practices identified by the National Human Trafficking Training and Technical Assistance Center (NHTTAC) and NHTTAC's Human Trafficking Leadership Academy (HTLA), and existing research examining the trafficking experiences of particular demographic groups, OTIP has retained questions asking about clients' disability status, sexual orientation and gender identity, and trafficking experience to better understand the populations at risk of human trafficking, inform program development, assess the unmet needs of these populations, and respond to recommendations articulated in the

[2021](#) and [2022](#) reports from the United States Advisory Council on Human Trafficking.[1] Clients have the right not to disclose this information, meaning that this information is not required to receive benefits and services under this grant program, and the grant recipients will inform their subrecipients and clients of how their information will be used through their confidentiality agreements/privacy disclosures. All client-level information reported to OTIP is deidentified before it is received.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Client Characteristics and Program Entry	1700	1	0.75	1,275	425	38.9	16,532.5
Client Case Closure	1700	1	0.167	283.9	94.6	38.9	3,679.94
Barriers to Service Delivery and Monitoring	35	4	0.167	23.4	7.8	38.9	303.42
Client Service Use and Delivery	1700	1	0.25	425	141.7	38.9	5,512.13
Victim Outreach	35	4	0.3	42	14	38.9	544.6
Training	35	4	0.5	70	23.3	38.9	906.37
Subrecipient Enrollment	35	3	0.167	17.5	5.8	38.9	225.62
Categories of Assistance	35	1	.75	26.25	8.75	38.9	340.38
Estimated Annual Burden Total:					720.95	**Estimated Annual Cost Total:**	**$28,044.96**

Burden Estimates

Burden estimates were informed and calculated through consultation with existing grant recipients, through ATIMS system development efforts, and an environmental scan of human trafficking screening forms and protocols, to estimate the time needed for grant recipients to

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[1] The Council was established on May 29, 2015, in section 115 of the Justice for Victims of Trafficking Act of 2015, Pub. L. 114-22, also known as the Survivors of Human Trafficking Empowerment Act. In December 2019, June 2020, and January 2021, the President appointed members of the Council to provide advice and recommendations to the U.S. government, specifically the Senior Policy Operating Group (SPOG) and the President's Interagency Task Force (PITF), to strengthen federal policy and programming efforts that reflect best practices in the anti-trafficking field; review federal U.S. government policy and programs intended to combat human trafficking, including programs relating to the provision of services for victims; serve as a point of contact for federal agencies reaching out to human trafficking survivors for input on anti-trafficking programming and policies in the United States; and represent the diverse population of human trafficking survivors across the United States, among other responsibilities.

engage in client-centered and trauma-informed approaches as they screen victims and obtain and document pertinent grant administration information. As it specifically relates to the client-level indicators, different screening forms and protocols may be leveraged by grant recipients depending on the target population to be screened, the environment where the screening will take place, and the professional background of the clinician or case manager conducting the screening, among other factors. Burden estimates were calculated based on the average amount of time required to populate all fields on the various forms after several indicators were removed (see section 15), however, clients served have the right not to disclose information and this information is not required to receive benefits and services under this grant program. These factors together mean that the estimates for grant recipients to report client-specific indicators, in particular, may be slightly higher or slightly lower, depending on what information clients feel comfortable sharing upon intake. Burden estimates for the other grant administration indicators were reduced according to the time taken to gather and enter information within the new ATIMS environment based on consultation and user testing with existing grant recipients (see section 3).

Cost Estimates
The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2021, which is $19.45 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $38.90. The estimate of annualized cost to respondents for hour burden is $38.90 times 720.95 hours or $28,044.96.
https://www.bls.gov/oes/current/oes_stru.htm

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no direct monetary costs to respondents other than their time to complete the forms.

14. Annualized Cost to the Federal Government

Grant recipient performance progress reports are reviewed by salaried staff who assess program performance as a regular part of their work. OTIP anticipates that the review of the information reported by the grant recipients will cost $47.81 per hour (job code 15-2041 and wage data from May 2021) and take 100 hours annually costing $4,781.00 annually. This includes the time it takes for the data to be cleaned, organized, interpreted, and summarized into usable information. An additional 40 hours will be spent annually by the grant officer to review and discuss the submissions with the grant recipient at $43.70 per hour (job code 19-3099 and wage data from May 2021) for an annual total of $1,748.00. The annual cost to the federal government is $6,529.00 in staff time.

15. Explanation for Program Changes or Adjustments

This request pertains to an existing information collection. The collection captures information on DVHT participant demographics (e.g., age, gender identity, race/ethnicity), type of trafficking experienced (sex, labor, or both), types of services and benefits provided, along with aggregate information on outreach activities conducted, subrecipients enrolled, and the types of trainings provided to relevant audiences. Minor updates have been made to performance indicators under this collection in consultation with existing grant recipients and stakeholders, to reduce respondent burden and strengthen privacy and confidentiality. A currently approved form under this collection, the DVHT Spending Form, was renamed to Categories of Assistance and the categories have been simplified to reduce reporting burden.

The revisions made to the various forms under this collection, as summarized in full below, reduce the overall time required to respond and enable OTIP to better fulfill its mandate in accordance with the TVPA of 2000, as amended. These revisions also allow OTIP to be more responsive to congressional inquiries, federal reporting requirements, and the needs of victims, as the information provided is factored into policy and program development efforts.

Overview of Revisions

To reduce burden and strengthen client privacy and confidentiality, the following DVHT client-level indicators have been removed:

- Type of Intake
- Date of Birth
- Services Requested at Intake
- Benefits Requested at Intake
- Trafficker Relationship to Victim
- Employment Status at Case Closure

To reduce burden, additional outreach and subrecipient indicators have also been removed, structured, or adjusted for simplicity:

- Screening Tool Used During Outreach removed
- Goal of Subrecipient Partnership removed
- Type of Subrecipient Partnership removed
- Additional Outreach Setting options Casinos, Digital: Social Media, Digital: Other, Factories, Homeless Encampments, Street Settings added
- Structured Target Population(s) options added (data element was previously open text)
- Services Provided by Subrecipient (In-House) and Services Provided by Subrecipient (by Referral) have been collapsed into one category: Services Provided By Subrecipient
- Categories of Assistance field values simplified

Additional minor updates were made to certain field values under the collection to bring the collection into alignment with terms used within the new ATIMS reporting database, terms

used by anti-trafficking practitioners and other subject matter experts providing services to victims, and to remove references to OTIP victim assistance programs that have sunset:

- Service Eligibility Status renamed to Grant Eligibility Status
- Client Uses A Different Term (free text to specify), Unknown, and Prefer Not To Answer added as field values under Gender Identity
- "Does the client identify as LGBTQ2S+?" data element changed to "Does the client identify as 2SLGBTQIA+?"
- Country of Origin renamed from Location of Origin
- Living Situation at Intake renamed from Current Living Situation
- Location of Services level changed to request only State/Territory; Remote option added
- Dental Health removed and replaced with Healthcare under Services Received
- Look Beneath the Surface Grantee removed as Referral Source option

16. Plans for Tabulation and Publication and Project Time Schedule

ACF will conduct univariate analysis to describe the service population and ascertain patterns. Summary findings will be presented in briefings, infographics, fact sheets, federal reports, responses to congressional inquiries or Freedom of Information Act requests, and presentations.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.