

National Human Trafficking Hotline (NHTH) Performance Indicators

**OMB Information Collection Request
0970 - NEW**

Supporting Statement Part A - Justification

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Submitted By:
Office on Trafficking in Persons
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

Section 107(b)(1)(B)(ii) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended at 22 U.S.C. § 7105(b)(1)(B)(ii), authorizes the Secretary of Health and Human Services to make a grant for a national communication system—the National Human Trafficking Hotline (NHTH)—to assist victims of severe forms of trafficking in persons in seeking help, receiving referrals, and reporting potential trafficking cases.

The Office on Trafficking in Persons (OTIP) made an award in the form of a Cooperative Agreement to a single, competitively selected grant recipient to maintain and support operation of the NHTH throughout the United States and U.S. territories. The NHTH is a toll-free hotline that operates 24 hours a day, every day of the year.

The Cooperative Agreement delineates the roles and responsibilities for the administration of the grant program, which include:

1. Operating the NHTH with experienced and trained anti-trafficking advocates;
2. Operating the NHTH website and responding to online signals;
3. Promoting NHTH services to increase the identification and protection of victims of severe forms of human trafficking;
4. Providing timely information and service referrals to human trafficking victims using a trauma-informed, person-centered, culturally responsive, and linguistically appropriate approach;
5. Notifying law enforcement agencies of potential cases of human trafficking as well as instances when a trafficking victim is in imminent danger, and;
6. Documenting emerging trafficking schemes to assist in the detection and investigation of trafficking cases.

Hotline Advocates who operate the NHTH collect information about signalers (individuals who contact the Hotline) and from signalers regarding potential victims of a severe form of trafficking in persons and potential human trafficking cases. Given the unique relationship the NHTH has to the public, OTIP is seeking clearance to collect information about and from these signalers that will be summarized and reported to OTIP by the NHTH grant recipient in the aggregate. This information collected through this information collection is necessary to support the monitoring of work done through this cooperative agreement, ensure signalers receive information and support needed, provide appropriate technical assistance (TA) to the grant recipient, and to document emerging trafficking schemes.

2. Purpose and Use of the Information Collection

The main purpose of this information collection is to improve OTIP's monitoring of the grant recipient's overall performance and to assess the extent to which the grant recipient is meeting required program activities to:

- Ensure potential victims of trafficking remain able to access assistance by constantly monitoring and mitigating factors impacting NHTH operations;
- Assist the grant recipient to assess and improve their project over the course of the project period;
- Disseminate insights related to human trafficking cases and trends to inform anti-trafficking strategies and policies; and
- Provide information to Congress, other federal agencies, stakeholders, the public, and other countries on the aggregate outputs and outcomes of the NHTH operations.

Information about signals and signalers informs, in particular, OTIP's visibility into the grant recipient's efforts to:

1. Promote NHTH services to increase the identification and protection of victims of severe forms of human trafficking;
2. Provide timely information and service referrals to human trafficking victims using a trauma-informed, person-centered, culturally responsive, and linguistically appropriate approach;
3. Notify law enforcement agencies of potential cases of human trafficking as well as instances when a trafficking victim is in imminent danger, and;
4. Document emerging trafficking schemes to assist in the detection and investigation of trafficking cases.

The NHTH Performance Indicator information is also used to inform the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act of 2000, as amended and for the purposes of fulfilling Government Performance and Results Act (GPRA) of 1993 requirements. Information is also used to inform State Department reports, Comptroller General requests, HHS Inspector General requests or investigations, congressional subpoenas or requests, court orders, and other authorized disclosures.

Through this information collection, OTIP will not collect any personally-identifiable information and **this information collection does not seek to collect any information from signalers (respondents) that they would not otherwise provide to Hotline Advocates in order to seek help, receive referrals, or report potential trafficking cases.** Rather, this information collection would provide OTIP with information about signalers that the grant recipient already collects to manage cases and administer the grant program, but is not currently provided to OTIP. The grant recipient currently provides OTIP with general performance data about the Hotline (ex. # of signals, # of referrals, etc.). This request for the grant recipient to provide additional information about signals and signalers.

3. Use of Improved Information Technology and Burden Reduction

Potential victims, representatives of governmental entities, law enforcement, first responders, members of the community, and representatives of nongovernmental entities providing social, legal, or protective services to individuals in the United States who may have been subjected to severe forms of trafficking in persons utilize the NHTH as signalers. The NHTH provides these individuals with several different ways to contact Hotline Advocates out of recognition that one means of contacting the hotline may be more burdensome than others for certain signalers depending on their needs and circumstances. Signals can take the form of calls, texts, online tip forms, live web chats, or emails.

OTIP will provide an Excel-based data collection and reporting instrument to reduce the reporting burden on the NHTH grant recipient. This template will be structured to be compatible with the NHTH grant recipient's case management system and data export functionality. This reporting template will allow OTIP to merge and sort data across time in an efficient way and minimize errors in reporting. The NHTH grant recipient will submit reports electronically through GrantSolutions.

4. Efforts to Identify Duplication and Use of Similar Information

While there are other state and local human trafficking hotlines, the NHTH is the only official hotline that is national in scope. The performance indicator data to be collected relates specifically to the ACF NHTH and information from the one awarded grant recipient per the Cooperative Agreement. Other federal programs will not concurrently assist the sole NHTH operator, so there is no duplication.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

Due to the urgent and sensitive nature of the work of the NHTH, it is imperative for OTIP to remain as up-to-date as possible on factors that may impact the NHTH responsiveness rate, evolving human trafficking trends, gaps in services, and other trends that significantly impact operations like COVID-19, viral misinformation campaigns, and targeted spoofs. Delays in receiving this information could result in potential victims of trafficking missing the assistance they need because the NHTH (and OTIP, as the awarding agency) have not mitigated challenges and obstacles. For example, information requested related to operational indicators like *Wait Time* and *Missed Signal Rate* provide immediately actionable insight into the responsiveness of the NHTH. Incoming signals to the Hotline increased by 28 percent in the first 6 months of 2021 compared to the same period in the prior year. At the same time,

the NHTH experienced a staff turnover rate of 13 percent with limited capacity to hire new personnel. When this operational data is coupled with the performance data requested (like information about *Signalers' Primary Reason for Contacting the Hotline* or *Signaler Proximity to the Situation*), OTIP is able to see whether these developments impact responsiveness and the grant recipient's ability to administer the NHTH and fulfill requirements of the award. Insights derived from signaler data ultimately strengthen the NHTH operations and the broader response to trafficking in persons.

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

As stated above, due to the urgent and sensitive nature of the work of the NHTH, it is imperative for OTIP to remain as up-to-date as possible to effectively address factors impacting the NHTH responsiveness rate, ever-evolving human trafficking trends, gaps in services, and external factors that significantly impact operations like COVID-19, viral misinformation campaigns, and targeted spoofs.

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 07/21/2021, Volume 86, Number 137, 38489-38490 and provided a sixty-day period for public comment. During the notice and comment period, one comment was received from the NHTH grant recipient. OTIP's responses are included as Attachment A.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Although the NHTH collects personally identifiable information, this information collection request is for *aggregate* information from the grant recipient; OTIP is not requesting to receive any personally identifiable information. Further, the NHTH grant recipient will not be expected to adjust its response protocols for the purposes of this performance indicator and grant monitoring information collection. This means that Hotline Advocates will continue to collect only the information necessary to assist the signaler with their efforts to seek help, receive referrals, or report potential trafficking cases.

The NHTH collects and safeguards all information 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. All communication with the NHTH is strictly confidential, to the extent permitted by law. When a signaler contacts the NHTH, they are informed that they can get help or report a tip anonymously, and that they are required to share only as much information as they are comfortable providing. The NHTH's confidentiality policies can be accessed here:

<https://humantraffickinghotline.org/privacy-policy-and-terms>. The NHTH grant recipient will never share personally identifying information about the signaler to any external agency, including law enforcement, service providers, and government agencies, without the explicit permission of the signaler, unless required by law. Exceptions include situations in which the signaler appears to be in imminent danger and the information is necessary to ensure his/her immediate safety; the victim is a minor; or the individual has admitted to committing a lethal crime or sexual assault, endangering the well-being of a child, or disclosing a specific intent to imminently commit these crimes. In these limited circumstances, the NHTH retrieves and reports information from caller ID or from the IP address in order to facilitate a report to the appropriate authorities.

As the operator of the NHTH, the grant recipient collects two types of data—personally identifying information, such as location of a particular trafficking case and name of an alleged trafficker, and non-personally identifying information, such as the city/state of signalers and how they learned about the NHTH. Personally identifying information about victims is only disclosed to law enforcement and/or service providers in situations where the NHTH has received the consent of the victim, the victim is a minor, or there is substantial information to suggest that the victim is in imminent danger. Service providers may only use such information for the purposes for which they were engaged by the NHTH. The NHTH grant recipient may use or share aggregate, non-personally identifying information collected from cases to analyze trends; produce reports regarding such trends, including Program Performance Reports (PPR) to OTIP and ad hoc reports; or publish heat maps. The NHTH maintains a robust case management and communication system to facilitate the collection, storage, access, transmission, and destruction of information.

OTIP will not be collecting any personally identifiable information about signalers from the grant recipient. Rather, the grant recipient will provide aggregate information about signalers (who may be potential victims of a severe form of trafficking in persons, service providers, law enforcement or investigatory personnel, or other community members) to OTIP through this collection. OTIP will use aggregate information for the purpose of fulfilling reporting requirements, interagency inquiries, and for research and analysis. Information is used to inform the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act of 2000, as amended and for the purposes of fulfilling Government Performance and Results Act (GPRA) of 1993 requirements. Information is also used to inform State Department reports,

Comptroller General requests, HHS Inspector General requests or investigations, congressional subpoenas or requests, court orders, and other authorized disclosures.

11. Justification for Sensitive Questions

All signals made to the NHTH are voluntary and confidential in nature. Signalers (respondents) provide information related to potential victims or trafficking situations in order to make a tip or access referrals. Hotline Advocates who field signals follow response protocols and may ask follow-up questions in order to assess the situation, identify trafficking indicators, direct resources, and gather the information necessary to administer the hotline and fulfill requirements of the grant award. Hotline advocates are trained to frame conversation's progress around the caller's wishes and to only collect the necessary data required to provide assistance. For example, demographic information about potential victims' age (Adult or Minor, not the number of individuals who are any one specific age), gender, country of origin, and type of trafficking experienced may be provided when a signaler calls in and is working through a response protocol with the Hotline Advocate. However, only the information necessary to assist the signaler is explicitly requested. The NHTH grant recipient will not be expected to adjust its response protocols for the purposes of the PPR collection. This means that Hotline Advocates will continue to collect only the information necessary to assist the signaler with their efforts to seek help, receive referrals, or report potential trafficking cases.

Information like age, race/ethnicity, gender identity, and sexual orientation, is **never assumed** or collected (meaning, inputted into structured fields within the NHTH grant recipient's case management system) on the basis of inference. Hotline Advocates collect and record information as it is reported by signalers. So, for example, if an individual contacts the hotline as a potential victim of trafficking, and identifies as male if asked about their gender identity, they will be recorded as "Male". If an individual identifies as a transgender male, they will be recorded as a "Transgender Male". If an individual uses a term other than Male, Female, Transgender Male, or Transgender Female to describe their gender identity or the gender identity of a potential victim, then the individual will be recorded as "Another Gender Identity". If a signaler does not provide the gender identity of the potential victim, they will be logged as "Unknown Gender Identity". It is important to note that third parties (e.g. service providers, law enforcement officials, family members, friends, and community members) may contact the NHTH on a potential victim's behalf, which means that certain pieces of demographic information may be reported by third-parties and collected by proxy. For example, if an individual contacts the NHTH and indicates concerns that her minor daughter is experiencing sex trafficking, age and gender identity information about the potential victim may be collected by proxy.

In public-facing data products, demographic information pertaining to gender identity will only be reported in the aggregate as Male, Female, Unspecified or Another Gender based on information as it is reported by signalers, where "Unspecified or Another Gender" is inclusive

of all individuals who identified as something other than Male, or Female, such as Transgender Male or Transgender Female. Demographic and other potentially sensitive information is only collected by Hotline Advocates when needed, meaning Hotline Advocates do not routinely prompt signalers for this information, this information is not available for all potential victims, and this information is not required to receive assistance or referrals. Hotline Advocates do not follow “scripts” but rather response protocols, and are trained to frame the conversation’s progress around the caller’s wishes and to only collect the necessary data required to provide assistance.

The NHTH grant recipient is required to serve adults and minors, regardless of their race/ethnicity, religious affiliations, gender identity or sexual orientation (including individuals who identify as Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, and/or Asexual (2SLGBTQIA+). Research shows that 2SLGBTQIA+, 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.¹ Information about the unique vulnerabilities, trafficking experiences, and service needs of needs of priority populations (e.g., migrant and seasonal workers, Indigenous communities, 2SLGBTQIA+ individuals, survivors of other forms of violence, individuals with disabilities, men and boys, and so forth) is necessary for OTIP to ensure the NHTH grant recipient is maintaining appropriate screening and reporting protocols to engage with and assist signalers in the most person-centered, trauma-informed, and culturally and linguistically appropriate way. For example, demographic information, particularly information about a potential victim’s gender identity, informs our understanding of the intersection between gender identity and human trafficking (e.g., the role gender identity and expression and exclusion plays in the risk for human trafficking; process of identification; interaction with education; social welfare; and criminal justice systems; access to resources; health disparities/inequities experienced by underserved communities; etc.). For

¹ Butler, C. N. (2015). The racial roots of human trafficking. *UCLA Law Review*, 62, 1464–1514.

Curtis, R., Terry, K., Dank, M., Dombrowski, K., & Khan, B. (2008). Commercial sexual exploitation of children in New York City, volume one: The CSEC population in New York City: Size, characteristics, and needs. (Report No. 225083). National Criminal Justice Reference Service. Retrieved from <https://www.ncjrs.gov/pdffiles1/nij/grants/225083.pdf>

Fedina, L., Williamson, C., & Perdue, T. (2016). Risk factors for domestic child sex trafficking in the United States. *Journal of Interpersonal Violence*, 34(13), 2653–2673. doi:10.1177/0886260516662306

Georgia State University. (2019). Atlanta youth count 2018 community report: The prevalence of sex and labor trafficking among homeless youth in metro Atlanta. Retrieved from <https://atlantayouthcount.weebly.com/>

Gibbs, D. A., Henninger, A. M., Tueller, S. J., & Kluckman, M. N. (2018). Human trafficking and the child welfare population in Florida. *Children and Youth Services Review*, 88, 1-10. <https://doi.org/10.1016/j.childyouth.2018.02.045>

Koeplinger, S. (2008). Sex trafficking of American Indian women and girls in Minnesota. *University of St. Thomas Law Journal*, 6(1), 129–137. Retrieved from <https://ir.stthomas.edu/cgi/viewcontent.cgi?article=1179&context=ustlj>

Martinez, O., & Kelle, G. (2013). Sex trafficking of LGBT individuals: A call for service provision, research, and action. *The International Law News*, 42(4).

Swaner, R., Labriola, M., Rempel, M., Walker, A., & Spadafore, J. (2016). Youth involvement in the sex trade: A national study. Center for Court Innovation. Retrieved from https://www.courtinnovation.org/sites/default/files/documents/Youth%20Involvement%20in%20the%20Sex%20Trade_3.pdf

[2] FCSM: Federal Committee on statistical Methodology INTERAGENCY REPORTS. FCSM | Federal Committee on Statistical Methodology Interagency Reports. (n.d.). https://nces.ed.gov/FCSM/interagency_reports.asp.

these reasons, it is important for OTIP to collect granular information for internal use and planning.

OTIP recognizes that information is not necessarily prompted in a consistent way, which may introduce concerns over the *quality* of the information provided in publicly disseminated reports and datasets. This stems from several different factors. One is that some respondents do not want to share this sensitive information and may be unsure how to answer in a given context. Another reason that information quality may be poor is that the proposed collection contains a mix of information self-reported by potential victims and information reported by proxy from other individuals (i.e. representatives of governmental entities, law enforcement, first responders, members of the community, and representatives of nongovernmental entities providing social, legal, or protective services to individuals in the United States who may have been subjected to severe forms of trafficking in persons) who may be calling in to report a potential victim. Finally, the information is not collected in a standardized way, which also affects the information quality. For these reasons, and per HHS CDO guidelines, OTIP reviews reports and public-facing data products to ensure that all information is reported with the appropriate caveats (i.e. that the nature of data collection means that demographic information is reported non-cumulatively and/or is optionally reported for all data elements, where relevant), so that the public can assess for itself whether there may be some reason to question the quality of the data or objectivity of the sources.

When NHTH data is obtained, particularly demographic and other potentially sensitive information, it is interpreted and recorded in a highly structured way to ensure data availability, integrity, and accuracy to the best extent possible. Hotline advocates store case information in a custom deployment of Salesforce, a customer relationship management object-oriented database. Data is entered into all structured fields per strict data entry parameters related to each of the elements and their corresponding field values, minimizing subjectivity and improving objectivity in data capture. Operational guidance (i.e. data dictionaries) clarifies, for example, that certain pieces of information are never to be assumed or are only to be recorded under certain circumstances. **Data availability** is provided to relevant, authorized NHTH grant recipient staff per the infrastructure. **Data integrity** is maintained through the NHTH grant recipient's information-system provides monitoring functionality, particularly event logs to monitor data field changes, provide notifications to the system administrator when certain data events occur, and the ability to generate audit reports at regular intervals. System tests also ensure that PII is only available to authorized individuals in association with their assigned role. Data Integrity is also ensured through role-based access control which limits the number of users that have write capability. Role Based Access Control and Attribute Based Access Control dictate data entry and reporting privileges and permissions for users. Log files are maintained for any changes that occur within the system, time-stamped, and monitored by system and application administrators. **Data Accuracy** is ensured through built in quality control standards requiring all data be entered in a correct and usable format per operational and data entry guidance. Per the terms of the cooperative agreement, the NHTH grant recipient is required to report all NHTH data

with the appropriate caveats (i.e. that the nature of this data collection means that demographic information is reported non-cumulatively and/or is optionally reported for all data elements, where relevant), and, to employ data masking and suppression methods to prevent potential disclosure risks prior to any public release or publication.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents (Signalers)	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
National Human Trafficking Hotline (NHTH) Performance Indicators	585,300	1	0.433333	253,630	84,543	\$76.81	\$6,494,029.64

Potential victims, representatives of governmental entities, law enforcement, first responders, members of the community, and representatives of nongovernmental entities providing social, legal, or protective services to individuals in the United States who may have been subjected to severe forms of trafficking in persons utilize the NHTH as signalers. The cost to respondents was calculated using the most current Bureau of Labor Statistics (BLS) wage data (May 2020) for job codes [11-9151] Social and Community Service Managers, [23-0000] Legal Occupations, and [21-0000] Community and Social Service Occupations.

The average of the combined mean hourly rates of Social and Community Service Managers (\$36.13), Legal Occupations (\$54.00), and Community and Social Service Occupations (\$25.09) is \$38.41. To account for fringe benefits and overhead the rate is multiplied by two which is \$76.81. The estimated annualized total cost to respondents (signalers) is \$76.81 times 84,543 hours or \$6,494,029.64.

The burden to the record keeper (NHTH grant recipient) is estimated below.

Category of Respondent	No. of Respondents	No. of Responses Per Respondent	Burden Per Response	Total Burden Hours
National Human Trafficking Hotline (NHTH) Grant Recipient	1	15	24.13 hours	362

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

There are no other costs to the respondents (signalers) or record keepers.

14. Annualized Cost to the Federal Government

The estimated annual cost to the federal government is \$5,366.40

Grant performance progress reports are reviewed by salaried staff who assess program performance as a regular part of their work. ACF anticipates that the review of the information reported by the grant recipient(s) will cost \$46.72 per hour (job code 15-2041 and wage data from May 2020 and take 80 hours annually costing \$3,737.60 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 \$43.88 per hour (job code 19-3099 and wage data from May 2020 for an annual total of \$1,755.20.

15. Explanation for Program Changes or Adjustments

This information collection does not seek to collect any information from signalers (respondents) that they would not otherwise provide to Hotline Advocates in order to seek help, receive referrals, or report potential trafficking cases. Rather, this information collection would provide OTIP with information about signalers that the grant recipient already collects to manage cases and administer the grant program. The grant recipient currently provides OTIP with general performance data about the Hotline (ex. # of signals, # of referrals, etc.), however this request is for the NHTH grant recipient to provide additional information about signals and signalers. This additional information is needed to improve OTIP's monitoring of the grant recipient's overall performance and to assess the extent to which the grant recipient is meeting required program activities. Given the unique relationship the NHTH has to the public, OTIP is seeking clearance to collect this information about and from signalers from the NHTH grant recipient.

16. Plans for Tabulation and Publication and Project Time Schedule

OTIP will provide aggregate information on information collected, including summary data about the age (Adult or Minor, not the number of individuals who are any one specific age), gender, and country of origin of potential victims, as well as the type of trafficking experienced by potential victims, for the purposes of submitting information for the annual Attorney General's report to Congress on federal activities responding to human trafficking as authorized under the Trafficking Victims Protection Act. OTIP may also provide analysis of the information for other public purposes such as research reports and briefings of interest to the public. As outlined in Section 10, PII will not be provided to OTIP and will not be shared with the public by the grant recipient. The NHTH grant recipient may use or share aggregate, non-personally identifying information collected from cases to analyze trends;

produce reports regarding such trends, including Program Performance Reports (PPR) to OTIP and ad hoc reports; or publish heat maps.

Per the terms of the cooperative agreement with the NHTH grant recipient, OTIP is expected to be notified of any public communications or reports about NHTH operations or NHTH data. The NHTH grant recipient must notify OTIP in advance of any plans to prepare and disseminate communications that primarily use data from the NHTH to propose or respond to government policies; analyze trends; conduct research; or address controversial, newsworthy, and/or current events. **This gives OTIP an opportunity to review any datasets that will be published for information quality.** This includes reviewing reports to **ensure that all data is reported with the appropriate caveats** and, that the **data masking and suppression methods used sufficiently prevent potential disclosure risks** prior to any release or publication. For example, a data product may include language specifying that the nature of hotline data collection means that demographic information is reported non-cumulatively and/or is optionally reported for all data elements, where relevant. Data products will also include language to specify appropriate inferences that can be made about the information provided. For example, information about potential victims' gender identity may be summarized with caveat language such as, "X percentage of potential victims who contact the NHTH identify as neither male nor female, or declined to provide their gender identity." This is in alignment with HHS guidelines, which requires the agency to "identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific, financial, or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the information quality or objectivity of the sources. Where appropriate, data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users." Per their data disclosure and suppression policies, the NHTH grant recipient does not

- Disclose statistics related to venues, industries, victim information or signaler information referenced fewer than three times;
- Provide information regarding geographic locations with a population smaller than 50,000;
- Provide information on languages with fewer than 1,000,000 speakers worldwide;
- Share a survivor's personally identifying information (PII) obtained by the NHTH without the consent of the survivor in question barring legal obligation, or;
- Disseminate disaggregated data unless they have entered into a data use agreement with the specific party, where both parties must agree to follow specific safeguards to protect sensitive information.

Given the annual volume of signals to the NHTH and the number of potential victims/cases reported to the NHTH, k values are typically far greater than 10 for data elements reported in publicly available reports and datasets, including demographic data elements.

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

Due to the nature of the calls received by the NHTH, it would most often not be reasonable to spend time informing callers of the OMB Expiration Date. The NHTH Performance Indicator Data that is reported to OTIP by the NHTH grant recipient will display the OMB Expiration Date and PRA Statement, but Hotline Advocates will not read this information to signalers.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.