To: Kelsi Feltz
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Vera J. Soto
Office on Trafficking in Persons (OTIP)
Administration for Children and Families (ACF)

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Subject: NonSubstantive Change Request – National Human Trafficking Hotline Performance Indicators (OMB #0970-0598)

This memo requests approval of nonsubstantive changes to the approved information collection, National Human Trafficking Hotline Performance Indicators (OMB #0970-0598).

Background

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 situations. 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.

National Human Trafficking Hotline Performance Indicators (OMB #0970-0598) is an active and approved collection of aggregate information about signalers (individuals who contact the NHTH) and from signalers regarding potential victims of a severe form of trafficking in persons and potential human trafficking situations. The information collected is reported on a monthly, semi-annual, and annual basis, and is necessary to support the monitoring of work done through the cooperative agreement, to ensure signalers receive the information and support requested, and to provide appropriate technical assistance (TA) to the grant recipient.

To address performance issues and streamline internal signal processing procedures, the NHTH has audited its data collection practices and has identified indicators that are no longer in use, relevant, or otherwise necessary that can be removed to reduce the data collection and reporting burden on Hotline Advocates, the individuals employed by the grant recipient organization to operate the NHTH. This process included efforts to collapse, condense, or otherwise simplify lists of data elements for clarity. Per the Supporting Statement, 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. **None of the proposed changes impact front-end data collection, or the questions that Hotline Advocates ask to ascertain the purpose of a signal and the signaler's desired response (i.e. to issue a referral or make a tip).** By contrast, each of the proposed

changes impact only the solely-awarded grant recipient and the changes are being informed by efforts by the recipient described above. This request aims to bring the collection into alignment with the grant recipient's back-end data collection practices (i.e. what Hotline Advocates record in their case management database to summarize the signal and actions taken in response). Each of the changes proposed seek to improve data capture and data quality.

Overview of Requested Changes

This request includes collapsing, condensing, and otherwise simplifying the lists of data elements for clarity. As an illustrative example, prior to the NHTH audit of their data collection practices, there were four different values for Law Enforcement (Local Law Enforcement, State Law Enforcement, Federal Law Enforcement, and International Law Enforcement) under the Signaler Type data element, all of which separated from one another in an alphabetical list containing 51 total response options. The NHTH nested the various types of Law Enforcement under one umbrella category in their case management database, among other nonsubstantive changes, to simplify data collection for Hotline Advocates. Requested changes bring OMB #0970-0598 into alignment with the grant recipient's revised data collection practices.

Response Options to be Removed from Signaler Type Data Element

The Signaler Type data element, "Number of signals (calls, text conversations, chat conversations, online tip forms, and emails) received by signaler type during the reporting period" is included on the grant recipient's semi-annual and annual performance reports. The following response options are proposed for removal:

- 211/311 Operator
- Asylee/Refugee
- DOJ/BJA Task Force Member
- Family Member of Potential Victim
- Family/Friend of Potential Victim of Labor Exploitation
- Family/Friend of Potential Victim of Other Crime
- Family/Friend of Potential Victim of Unknown Situation
- Friend of Potential Victim
- Military Personnel
- NGO - General Social Services
- NGO - Other
- NGO - Worker Rights
- Potential Victim of Labor Exploitation
- Potential Victim of Other Crime
- Potential Victim of Unknown Situation
- Student
- Unknown
- Visa Holder

Reasons for Removing Signaler Type Response Options

Hotline Advocates do not follow “scripts” or administer questionnaires, but rather execute response protocols. Advocates are trained to frame the conversation’s progress around the caller’s wishes and to only collect the necessary data required to provide assistance. What this means in practice is that each signaler to the NHTH provides different information to Hotline Advocates depending on their needs and reasons for contacting the Hotline. Hotline Advocates do not collect any information from signalers (respondents) that they would not otherwise provide in order to seek help, receive referrals, or report potential trafficking cases. Hotline Advocates may not be able to ascertain or assign a signaler type depending on the information shared by the signaler and whether that information is necessary to provide an appropriate referral, or assist the signaler in submitting a tip. The NHTH audited its data collection practices to identify data elements with low capture. Each of the signaler types proposed for removal were not commonly observed as contacting the NHTH through any signal type (call, text, chat, email, or tip form) in year over year analyses of signal data.

<u>Signaler Type Response Options to be Renamed and/or Nested Under a New Category</u>

- Airline/Airport Personnel - to be nested under Business, renamed Commercial Transportation Employee
- Bus Industry Employee - to be nested under Business, renamed Commercial Transportation Employee
- Child Welfare/ORR - to be split into two values and nested under Government
- Faith-based Organization/Representative - to be nested under NGO
- Family Member of Potential Victim of Trafficking - consolidated to Connected/Related to PV of Trafficking
- Family/Friend/Acquaintance of Potential Controller - renamed Connected/Related to Potential Controller
- Federal Law Enforcement - to be nested under Law Enforcement
- Finance Industry Employee - to be nested under Business
- Foreign Government - to be nested under Government
- Friend of Potential Victim of Trafficking - consolidated to Connected/Related to PV of Trafficking
- Hotel/Motel Employee - to be nested under Business
- International Law Enforcement- to be nested under Law Enforcement
- Local Law Enforcement - to be nested under Law Enforcement
- Medical Professional - consolidated to Medical/Mental Health Professional
- Mental Health Professional - consolidated to Medical/Mental Health Professional
- NGO - Anti-trafficking - to be nested under NGO
- NGO - DV/SA - to be nested under NGO
- NGO - Immigrant/Refugee - to be nested under NGO
- NGO - RHY - to be nested under NGO
- Other
- Press/Media - to be nested under Business
- State Law Enforcement - to be nested under Law Enforcement
- Taxi/Rideshare Driver/Employee - to be nested under Business, renamed Commercial Transportation Employee
- Truck Stop Employee - to be nested under Business, consolidated to Truck Industry Employee

- Trucker - to be nested under Business, consolidated to Truck Industry Employee

Reasons for Renaming/Nesting of Signaler Type Response Options

The NHTH grant recipient collects information beyond that which OTIP requires for the purposes of performance reporting. The current list of response options under Signaler Type has been shaped by various priorities, public awareness raising activities, strategic engagements, and other efforts that have shifted over time. Hotline Advocates report that multi-select fields and drop-down lists containing more than 10 values tend to be cumbersome and time intensive to navigate. Removing "legacy" values no longer in use and nesting values that remain in more intuitive ways simplifies the case management database user interface for Hotline Advocates. The list of initial drop-down response options was simplified to 15 from a prior list of over 50.

<u>Venue/Industry Response Options to be Renamed and/or Nested</u>

The Venue/Industry data element, "Number of cases reported involving each venue/industry where potential trafficking took place during the reporting period" is included on the grant recipient's annual performance report. The following adjustments to response options are proposed:

- Agriculture/Farms/Animal Husbandry - renaming to Agriculture & Animal Husbandry
- Aquafarming/Fishing - consolidating into Other
- Bar/Club/Cantina - renaming Bars, Strip Clubs, and Cantinas
- Begging Rings - consolidating into Peddling & Begging
- Education - consolidating into Other
- Escort Service/Delivery Service - renaming Escort Service
- Forestry/Reforestation - renaming Forestry & Logging
- Hospitality - consolidating to Hotels & Hospitality
- Hostess/Strip Club - if occurring in LT situation, then it will be Arts & Entertainment; if occurring in ST or S&L, then it will be Bars, Strip Clubs, and Cantinas
- Hotel/Motel-Based Commercial Sex - consolidating into Escort Services
- Internet-Based Commercial Sex - consolidating into Escort Services
- Janitorial/Out-Call Cleaning Services - renaming Commercial Cleaning Services
- Landscaping Services - renaming Landscaping
- Legal Brothel - consolidating into Other
- Manufacturing/Factories - renaming Factories & Manufacturing
- Mining, Quarrying, Oil/Gas Extraction - consolidating into Other
- Other Small Business - consolidating into Other
- Peddling Rings - consolidating into Peddling & Begging
- Pre-school/Child Day Care Service - consolidating into Other
- Professional/Scientific/Tech Services - consolidating into Other
- Residence-Based Commercial Sex - renaming Residential-Based Commercial Sex
- Restaurant/Food Service - renaming Restaurants & Food Service
- Retail - consolidating into Other
- Sex Tourism - consolidating into Other
- Street-Based Commercial Sex - consolidating into Outdoor Solicitation
- Transportation - consolidating into Other

- Traveling Carnivals - renaming Carnivals
- Truck Stop - consolidating into Outdoor Solicitation

Reasons for Renaming/Nesting of Venue/Industry Response Options

Changes proposed to response options under this data element are either minor spelling changes, adjustments to the delimiters used in the data element name, or are otherwise minor changes intended to simplify the case management database user interface for Hotline Advocates. The overall number of response options under this data element was reduced to 28 from a previous list of 42.

Time Sensitivities

Proposed updates apply to data elements on the grant recipient's semi-annual and annual performance reports, which are due 30 days after the close of the reporting period (April Mid-Year Report summarizing 10/1/2023 - 3/31/2024 and the October Year-End Report summarizing 4/1/2024-9/30/2024). To ensure the grant recipient has time to implement the corresponding changes to reporting well in advance of the next reporting period, we ask for a response as soon as possible. Additionally, the project period for the NHTH grant recipient ends on 9/30/2025. OTIP plans to publish a Notice of Funding Opportunity (NOFO) to recompete the NHTH award before the IC expiration date. In order to ensure the NOFO reflects the most current iteration of performance monitoring expectations under this IC (OMB #0970-0598) we ask for a response as soon as possible.