

SOAR Demonstration Grant Program Data

**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

The SOAR (Stop, Observe, Ask, Respond) to Health and Wellness Training (SOAR) Demonstration Grant Program was developed in response to the Trafficking Victims Protection Act of 2000 (Public Law 106-386), § 106(b), as amended (22 U.S.C. 7104(b)(1) and 22 U.S.C. 7105(b)(1)(B)), which calls on agencies to “increase public awareness of the dangers of trafficking and the protections that are available for victims of trafficking” and provide “services to assist potential victims of severe forms of trafficking in persons.” The program’s goal is to fund the implementation of SOAR trainings and capacity building efforts to identify, treat, and respond to patients or clients who have experienced severe forms of human trafficking as defined by the Trafficking Victims Protection Act (TVPA) of 2000, as amended, among their patient or client population. SOAR is a nationally recognized, accredited training program delivered by OTIP’s National Human Trafficking Training and Technical Assistance Center (NHTTAC) and designed to help target audiences identify and respond to those who are at risk of, are currently experiencing, or have experienced trafficking and connect them with needed resources.

This information collection will enable OTIP to measure grant project performance, provide technical assistance to grant recipients, assess program outcomes, inform program evaluation, respond to congressional inquiries and mandated reports, including required contributions to the annual Attorney General’s Annual Report to Congress on U.S. Government Activities to Combat Trafficking in Persons.

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 individuals who have experienced or are at risk of experiencing human trafficking, and to assess the extent to which grant recipients are meeting required program activities to:

1. Implement SOAR trainings, including SOAR Online and SOAR for Organizations, for staff at relevant levels and divisions, including at a minimum frontline and support staff most likely to encounter an individual who has experienced trafficking; mid-level and senior management responsible for approving changes in policies and protocols and resources to support implementation; and staff who oversee procurement and external partners, across the prime’s organization.
2. Build the capacity of organizational staff to identify patients or clients who are experiencing human trafficking and provide them with coordinated, age-appropriate, culturally responsive, trauma-informed, patient-centered, and evidence-based care and/or services through ongoing training and engagement.
3. Serve patients or clients who are experiencing human trafficking in a coordinated, age-appropriate, culturally responsive, trauma-informed, person-centered, and evidence-based way and establish a continuum of care by entering into memoranda of understanding (MOUs) with local direct service providers and multidisciplinary

stakeholders willing to receive referrals and provide aftercare services that are beyond scope of the prime's capacity or mission to support patients or clients who are experiencing human trafficking.

4. Develop, implement, and evaluate the effectiveness of the Human Trafficking Response Protocol (HTRP) and corresponding policies and procedures that include best practices for working with law enforcement and making referrals when serving patients or clients in service settings who have experienced human trafficking to further refine and enhance project implementation. HTRP must comply with federal, state, local, and tribal laws, including legal privacy and confidentiality requirements for clients, patients and health care and social services providers.

The information collection captures information on organizations enrolled in each grant recipient's multidisciplinary network of providers serving individuals who have experienced, or are at-risk of experiencing, a severe form of trafficking in persons, and the clients served by providers within these networks. Data elements capture information about organizational providers (e.g. number of individuals trained to identify and respond to trafficking, types and number of trainings offered, types of services provided, number of clients enrolled in services, organizational barriers to service delivery and implementation, and total funds spent by category of assistance) and client demographics (e.g., total number of clients enrolled in services by providers within the recipient's multidisciplinary network by client age, race/ethnicity, sex, gender identity, sexual orientation, disability status, and preferred language).

3. Use of Improved Information Technology and Burden Reduction

To the extent practicable, OTIP is committed to reducing the burden on applicants. As it relates to data collected about organizations and participants who participate in SOAR training and their feedback, NHTTAC uses an online evaluation form, which allows recipients to complete the evaluation at a time and location convenient for them and minimizes data entry on the part of prime and subrecipients. The participant feedback form is a customizable instrument with a menu of questions that can be tailored to the most relevant questions for each SOAR offering to minimize the burden on respondents.

All other SOAR Demonstration Grant Program Data will be reported to OTIP via structured Excel workbooks until recipients are phased into OTIP's new Anti-Trafficking Information Management System (ATIMS) for grant recipients to manage client and programmatic information required under OTIP programs. To the extent practicable, ATIMS will be made interoperable with existing health management information system technologies, to allow for easier aggregation of data from providers within the multidisciplinary network, and reporting to OTIP. ATIMS 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 SOAR Demonstration Grant Program. As required under the funding opportunity, recipients must describe how SOAR Demonstration Grant 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 SOAR Demonstration Grant 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

Small businesses or other small entities may participate in SOAR offerings or provide services to clients through the multidisciplinary network of providers. OTIP minimizes the reporting burden on these entities by asking for readily available information (e.g. information obtained as part of standard health care administration procedure), and using short, structured, easy-to-complete information collection instruments for prime recipient aggregation and reporting to OTIP.

6. Consequences of Collecting the Information Less Frequently

The information collected and reported under the SOAR Demonstration Grant 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 "increase public awareness [...] of the dangers of trafficking and the protections that are available for victims of trafficking" and provide "services to assist potential victims of severe forms of trafficking in persons." Additionally, without feedback on NHTTAC's SOAR offerings for SOAR Demonstration Grant Participants, OTIP will not have timely information to fulfill the requirements of the SOAR to Health and Wellness Act of 2018, or to make continuous improvements to ensure offerings are meeting recipient needs and addressing emerging issues and other needs of practitioners in the field.

Timely collection of SOAR Demonstration Program Data also enables OTIP to evaluate progress made toward priority actions and commitments articulated in the Biden-Harris Administration's [National Action Plan to Combat Human Trafficking](#) (NAP). The NAP calls on the Department of Health and Human Services (HHS) to support the following relevant activities:

- Enhance training on identification and prevention of human trafficking (Priority Action 2.1.3: Regularly train Federal law enforcement and service provider agencies on identifying human trafficking).
- Develop, validate, and implement screening protocols (Priority Area 2.1.1: Develop or update, validate, and implement screening forms and protocols).
- Increase access to mental health and other healthcare services for individuals who are experiencing human trafficking (Priority Action 2.6.1: Increase access to mental health and other healthcare services).
- Ensure input from individuals with lived experience in human trafficking is consistently incorporated into trainings, policies, and programs (Priority Action 4.3.2: Leverage federal survivor-consultant networks and federal training and technical assistance centers to ensure survivor input is consistently incorporated into policies and programs).

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

Not applicable. The information collected will be voluntary and will not be used for statistical purposes.

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 March 21, 2023, Volume 87, Number 54, page 16984, and provided a thirty-day period for public comment. One comment was received, which is attached. The respondent wrote to express support for the collection of client demographic information, particularly information pertaining to client sexual orientation and gender identity, citing the importance of measuring these concepts given that "LGBTQ+ people and especially youth have long and continue to report disproportionate rates of violence, discrimination, homelessness, and other experiences driven by stigma that leave them particularly vulnerable to experiencing various forms of human trafficking." The respondent emphasized the importance of collecting this information in such a way that respects respondents' confidentiality and expressed approval for the use of the sexual orientation and gender identity questions proposed by the [National Academies of Sciences, Engineering, and Medicine's 2022 Report](#). No updates were made to the collection based on this feedback.

During the sixty-day period for public comment (notice published on August 25, 2022, Volume 87, Number 164, page 52387), four comments were received, which are also attached. Respondents provided minor comments, which primarily focused on areas where definitions or operational guidance could be strengthened for added clarity. OTIP updated the reporting reference guide accordingly. One commenter highlighted the potential utility of collecting on an additional client demographic indicator, Disability Status, to assess recipients' ability to serve clients who may be navigating disability, and to implement programs that are cognizant of the ways disability status may impact the risk of human trafficking, process of identification, experience of service delivery, access to resources, among other considerations. Accordingly, a client demographic disability status question was added to the collection. OTIP uses the disability question leveraged by the Census Bureau in the American Community Survey (ACS) in all its victim assistance and client service programs. No comments received were related to cost or time burdens associated with this collection.

Consultation

OTIP engaged newly awarded prime grant recipients 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 informing this new information collection, and to identify ways to reduce the overall reporting burden. OTIP also leveraged insights from other, similarly structured grant programs to anticipate reporting challenges that may be faced by prime recipients aggregating information from subrecipient providers for this collection. To the maximum extent practicable, OTIP included in this collection data elements that can be easily harmonized by providers within the multidisciplinary network (e.g. shared terms and definitions, interoperable health management system administrative data elements) to reduce the aggregation and reporting burden on prime recipients. OTIP's ATIMS system will be designed based on this feedback.

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 develop, implement, and evaluate the effectiveness of a Human Trafficking Response Protocol (HTRP) and corresponding policies and procedures that include best practices for working with law enforcement and making referrals when serving patients or clients in service settings who have experienced human trafficking to further refine and enhance project implementation. The HTRP must comply with Federal, State, local, and tribal laws, including legal confidentiality requirements for patients and healthcare providers.

During the initial 12-month project implementation period, prime recipients are expected to recruit, hire, and onboard new staff who will support the implementation of the project; participate in the SOAR trainings; develop an organizational audit, situational analysis, strategic action plan, and training plan; and establish a continuum of care. Included in these efforts is the development of a project plan describing how prime and subrecipients will protect 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, as well as how this information will be collected and safeguarded. The applicant 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. Additionally, the prime and subrecipients must provide a plan for the disposition of such information at the end of the project period. Under no circumstance should personally identifiable information from health or case management records be disclosed without the client's express written permission.

11. Justification for Sensitive Questions

There are not sensitive questions included in this information collection except those questions pertaining to client demographics. The SOAR Demonstration Program is informed by the "[Core Competencies for Human Trafficking Response in Healthcare and Behavioral Health Systems Report](#)," which outlines the necessary skillsets for practitioners, including those providing services to individuals belonging to groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage. These competencies include but are not limited to:

- Using a trauma- and survivor-informed, culturally responsive approach;
- Understanding the nature and epidemiology of trafficking;
- Evaluating and identifying the risk of trafficking;
- Evaluating the needs of individuals who have experienced trafficking or individuals who are at risk of trafficking;
- Providing client/patient-centered care;
- Adhering to legal and ethical standards, and;
- Integrating trafficking prevention strategies into clinical practice and systems of care.

Through the SOAR Demonstration Program, healthcare, behavioral health, and social service delivery professionals are expected to increase their awareness of how race, gender, sexual orientation, and other demographic and identity-based variables intersect with risk of exploitation, and to serve individual clients, including those belonging to groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage. To assess progress toward those objectives, providers are expected to report aggregate level information about clients served (e.g., total number of clients enrolled in services by providers within the recipient's multidisciplinary network by client age, race/ethnicity, sex, gender identity, sexual orientation, disability status, and preferred

language). Data collected will allow providers to assess their capacity to provide appropriate care for individuals who have experienced trafficking and prevent trafficking among those who are at risk of trafficking. Data from this collection will also inform gaps in the evidence-base pertaining to the impact of provider core competencies on client outcomes.

Further, 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 victims of trafficking in persons, best practices identified by NHTTAC and NHTTAC’s [Human Trafficking Leadership Academy \(HTLA\)](#), and existing research examining the trafficking experiences of particular demographic groups, OTIP is proposing to collect information about client’ race/ethnicity, disability status, sexual orientation and gender identity, 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 All data will be de-identified and reported to OTIP in the aggregate. 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.

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
Provider Capacity Building Indicators	75	4	1	300	100	62.38	\$6,238

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.

SOAR Demonstration Grant Participant Training Form	4500	1	0.75	3375	1125	62.38	\$70,178
Client Demographic Indicators	2000	4	1	8000	2667	62.38	\$166,367
Human Trafficking Response Protocol (HTRP) Indicators	75	4	2.5	750	250	115.22	\$28,805
Multidisciplinary Network Provider Indicators	75	4	0.5	150	50	115.22	\$5,761
Categories of Assistance Form	75	1	2.5	188	63	115.22	\$7,259
Estimated Annual Burden Total:					4,255	Estimated Annual Cost Total:	\$284,608

Burden Estimates

Burden estimates were informed and calculated through consultation with NHTTAC SOAR offering providers, grant recipients, and health care providers, to estimate the time needed for grant recipients to engage in client-centered and trauma-informed approaches as they screen victims and obtain and document pertinent grant administration information. The package contains forms that will require varying levels of burden hours to complete, which impacts the estimated cost burden. The estimates of annualized cost to respondents are based on appropriate wage rate categories and annual salaries for position types in which respondents serve. Estimates for the average hourly wage for respondents are based on the U.S. Department of Labor National Compensation Survey estimate for the occupations presented below, which were gathered from the following website: https://www.bls.gov/oes/current/oes_stru.htm.

The wage data from May 2021 were applied for the following job codes:

- 29-9099—Healthcare Practitioner/Technical Workers—at \$31.19 per hour
- 11-9111—Medical and Health Services Manager—at \$57.61 per hour

To account for fringe benefits and overhead the rate was multiplied by two for each job code. Estimates were calculated using the wage data for each form as follows:

- 29-9099—Healthcare Practitioner/Technical Workers—at \$62.38 per hour
 - o Provider Capacity Building Indicators
 - o SOAR Demonstration Grant Program Participant Training Form

- o Client Demographic Indicators
- 11-9111—Medical and Health Services Manager—at \$115.22 per hour
 - o Human Trafficking Response Protocol (HTRP) Indicators
 - o Multidisciplinary Network Provider Indicators
 - o Categories of Assistance Form

The estimate of annualized cost to respondents for 4,225 hours burden is \$284,608.

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 200 hours annually costing \$9,562.00 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 \$11,310.00 in staff time.

15. Explanation for Program Changes or Adjustments

This is a new information collection to monitor recipients' progress toward required activities under the new grant program.

16. Plans for Tabulation and Publication and Project Time Schedule

SOAR Demonstration Grant Program Data will be tabulated using parametric and nonparametric statistical tests. All findings will be reported de-identified and in aggregate form. OTIP may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). OTIP will disseminate the findings when appropriate, strictly following the U.S. Department of Health and Human Services' [Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated to the Public](#), and will include specific discussion of the limitation of the data. Additionally, over the past year, OTIP and NHTTAC have been working closely with ACF's Office of the Chief Data Officer (OCDO) to explore opportunities to make NHTTAC's T/TA data more open and accessible to the general public. Feedback on SOAR offerings and implementation, including those provided to SOAR Demonstration Grant Program participants (TAB F: SOAR Demonstration Grant Participant Training Feedback Form), will

be de-identified and made available to the public on healthdata.gov on a fiscal year annual basis.

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.