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Office of Management and Budget (OMB)

From: Vera J. Soto
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Administration for Children and Families (ACF)

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Subject: Nonsubstantive Change Request – Domestic Victims of Human Trafficking Program Data (OMB #0970-0542)

This memo requests approval of nonsubstantive changes to the approved information collection, Domestic Victims of Human Trafficking Program Data (OMB #0970-0542).

Background

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 through the Domestic Victims of Human Trafficking (DVHT) Program. The central purpose of the DVHT Program is to connect survivors with the services they need to improve their well-being and health outcomes.

Domestic Victims of Human Trafficking Program Data (OMB #0970-0542) is an active and approved collection of client-level data on those served through the DVHT Program. The information collected allows ACF to evaluate service delivery efforts, inform prevention programming, and monitor program outcomes. In addition to client-level data, information on the type and cost of services provided through the program is collected to enable ACF to respond to congressional inquiries related to program spending and to provide technical assistance to grant recipients on managing available funding for individuals and households enrolled in the program.

DVHT currently inclusive of two distinct award programs: the Domestic Victims of Human Trafficking and Services Outreach Program (DVHT-SO) and the Demonstration Grants to Strengthen the Response to Victims of Human Trafficking in Native Communities (VHT-NC) Program. The performance indicators and data collection instruments under OMB #0970-0542 apply to both DVHT programs.

The primary objective of OTIP’s victim assistance programs, including DVHT, is to provide comprehensive, culturally and linguistically responsive case management to individuals who have experienced a severe form of trafficking in persons. Current DVHT recipients have reported concerns over competing requirements and priorities under their awards, which made it difficult to balance direct service provision against training activities for community-based providers and members of the general public. Grant recipients have also cited concerns over the lack of foundational knowledge within their communities as to what constitutes human trafficking victimization, which has impacted their ability to identify potential victims and connect those individuals with services. Beginning in FY 2024, so as to reduce reporting burden on recipients and strengthen public awareness within the geographic service areas where recipients implement their programs, training is no longer required or an allowable activity under DVHT. These updated requirements pertaining to allowable and required programmatic activities were made public through the most recent NOFOs and grant award processes and are already in effect. As such, we are requesting to remove the training indicators from OMB #0970-0542 and to make a minor update to the Outreach form for recipients to report on their public awareness activities.

Overview of Requested Changes

OTIP is requesting to remove the Training form and all of the data elements on the Training form from the collection. OTIP is also requesting to add one indicator to the Outreach form.

Training Form Data Elements to Remove

Training form

To reduce burden and bring the collection into alignment with new programmatic requirements, OTIP is requesting to discontinue use of and remove the Training form data elements. We have removed the Training form from the collection and updated the burden accordingly.

Outreach form

OTIP proposes to add one indicator to the Outreach form: “Number of Public Awareness Activities Conducted”. DVHT seeks to increase domestic victim identification through service delivery and outreach and adds a necessary public awareness component to improve the general public’s understanding of human trafficking victimization, particularly labor trafficking. The addition of “Number of Public Awareness Activities Conducted” to the Outreach Form will bring the collection into alignment with revised DVHT requirements necessitating recipients to engage in public awareness¹ activities.

Time Sensitivities

Proposed updates will apply to grant recipients first quarterly report (due 1/30/2024).

¹ OTIP distinguishes between outreach and public awareness. Outreach is direct contact with individuals who may have experienced labor and/or sex trafficking or populations who are vulnerable for or are considered to be at a higher risk for human trafficking. Examples include street outreach, targeted online outreach, and human trafficking screening carried out in court diversion programs, detention centers, community organizations, agricultural settings, hospitality industry, construction industry, restaurants, factories, domestic work settings, migrant health centers, and foster care settings. Public awareness includes education efforts aimed at the general public to increase awareness and understanding of labor trafficking of foreign national individuals. Examples include community awareness raising, newspaper articles, radio or television interviews, tabling at conferences, print media, electronic media, etc.

Additionally, any updates made to performance indicators under this collection will need to be reflected within the Anti-Trafficking Information Management System where recipients submit their reports. To ensure grant recipients have adequate time to implement the corresponding changes to data cleansing, aggregation, and reporting well in advance of the next reporting period, and to ensure OTIP's system development team is able to proceed with accurate requirements, we ask for a response as soon as possible.