

National Human Trafficking Hotline (NHTH) Performance Indicators

**OMB Information Collection Request
0970 - 0598**

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 of the Trafficking Victims Protection Act (TVPA) of 2000, as codified 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. HHS delegated this authority to the Office on Trafficking in Persons (OTIP). OTIP awards 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 recipient of the NHTH grant award is expected to:

1. Operate the NHTH’s telephone, text services, chat services, and website via a coordinated national communications system available 24 hours a day;
2. Provide timely information and service referrals to victims of human trafficking;
3. Notify law enforcement and child welfare agencies of potential cases of human trafficking, as required by law and in other situations where appropriate;
4. Establish and maintain a comprehensive online directory of community-based service providers across the United States and U.S. territories.

The NHTH grant recipient collects information about signalers (individuals who contact the hotline) and from signalers regarding potential human trafficking situations and potential victims. The NHTH grant recipient summarizes and reports this information to HHS in the aggregate. This is an active, approved collection. The information obtained 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. There are no changes proposed to the information collection other than updates to the estimated number of respondents, as shown and described in sections A12 and A15.

2. Purpose and Use of the Information Collection

The main purpose and use of this information collection is to monitor NHTH performance, the NHTH’s responsiveness to the needs of signalers and, the extent to which the NHTH grant recipient fulfills required program activities. Information obtained through this collection is also used to:

- Continuously monitor and mitigate factors impacting NHTH operations;
- Disseminate insights related to human trafficking situations 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 obtained through this collection also enables HHS to fulfill statutory reporting requirements:

- A provision in the TVPA of 2000, as amended, requires the Attorney General to submit annually “a report on Federal agencies that are implementing any provision of this chapter.” 22 U.S.C. § 7103(d)(7) (referencing 22 USC Chapter 78). HHS annually submits information to the Department of Justice on activities it undertakes under Sections 106(b) and 107(b) of the TVPA.
- Since 2010, the U.S. Department of State reports annually on the activities of the Nation to combat human trafficking and protect victims, and the data pertaining to HHS programs, including the NHTH, are included in that report.

Through this information collection, OTIP does not collect or receive any personally-identifiable information. This information collection does not seek to collect any information from signalers (respondents) that they would not otherwise provide to call specialists to seek help, receive referrals, or report potential trafficking situations to law enforcement. Rather, this information collection provides OTIP with aggregate-level information about signals, signalers, and the potential human trafficking situations described to the NHTH that the grant recipient collects to administer the grant program.

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. There are several ways to contact the NHTH out of recognition that certain means of contacting the NHTH may be more burdensome than others, depending on signaler needs and circumstances. Signals can take the form of calls, texts, online tip forms, live web chats, or emails.

OTIP built and, as of September 2022, deployed the Anti-Trafficking Information Management System (ATIMS) for grant recipients to report required performance data. 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. OTIP is in the process of integrating all grant program recipients into ATIMS. At this time, the NHTH grant recipient submit reports electronically through GrantSolutions. OTIP

provides an Excel-based data collection and reporting instrument to reduce the reporting burden on the NHTH grant recipient. This template is structured to be compatible with the NHTH grant recipient's case management system and data export functionality. This reporting template allows OTIP to merge and sort data across time in an efficient way and minimize errors in reporting until the NHTH reporting is enabled in ATIMS, which is anticipated during the grant award performance period beginning October 2025.

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 HHS 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 such as 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.

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.

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 06/26/2025 (90 FR 27309) and provided a sixty-day period for public comment. No comments were received.

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 (PII), this information collection request is for *aggregate* information from the grant recipient; OTIP does not receive any personally identifiable information through this collection. Further, the NHTH grant recipient is not expected to adjust its response protocols for the purposes of this performance indicator and grant monitoring information collection. This means that NHTH call specialists will continue to collect only the information necessary to assist the signaler with their efforts to seek help, receive referrals, or report potential trafficking situations.

The NHTH is required to follow all applicable privacy and confidentiality laws and safeguard personally identifiable and sensitive information in accordance with federal, state, local, and tribal requirements. All communications are confidential to the extent permitted by law. Hotline staff do not share PII with service providers, law enforcement, or other agencies without the individual's explicit consent—unless disclosure is legally required.

Federal law (22 U.S.C. 7115) requires all grants and recipients funded under sections 7104(b), 7105(b), or 7105(f) of the Trafficking Victims Protection Act to follow strict privacy and confidentiality standards. These standards, established under the Violence Against Women Act (34 U.S.C. 12291(b)(2)) and the Family Violence Prevention and Services Act (42 U.S.C. 10406(c)(5)), prohibit the disclosure of PII without the individual's informed, written consent.

Under these requirements, recipients, including the NHTH grant recipient, may not:

- Disclose, reveal, or release any PII or individual information collected, regardless of whether the information has been encoded, encrypted, hashed, or otherwise protected.
- Disclose, reveal, or release individual client (adult client 18 years of age and older) information without the informed, written, reasonably timed-limited consent of the person about whom information is sought.
- Require an individual to provide consent to release their PII as a condition of utilizing services.

- Share PII to comply with federal, tribal, or state reporting, evaluation, or data collection requirements for OTIP or any other federal, tribal, or state grant program.

An exception to these confidentiality requirements exists when disclosure is mandated by federal, state, local, or tribal law. This includes but is not limited to situations involving minors or circumstances where there is an immediate threat of harm or danger to an individual or others. In specific situations, it is required to notify child welfare agencies, law enforcement, or other authorized entities, as outlined below.

Mandatory Reporting Requirements	
Situation	Required Hotline Response
A child under the age of 18 may be experiencing abuse or neglect. This includes labor trafficking, sex trafficking, being missing from care, running away, sexual abuse, image-based sexual abuse, physical harm or neglect, or suicidal or homicidal ideation.	The Hotline must report the situation to the appropriate authorities. This may include federal, state, or local law enforcement; state and local child welfare; the National Center for Missing & Exploited Children; the CyberTipline; OTIP; and other relevant entities.
An adult is in imminent harm or danger without intervention. The contactor may be the person at risk or calling on behalf of someone else.	The Hotline must report the situation to law enforcement, even if the adult or contactor does not consent.
An adult requests that their situation be reported to law enforcement.	The Hotline contacts law enforcement, as requested.

In all other situations involving adults who are not in immediate danger—and who do not give permission to share their information—the Hotline does not report to law enforcement.

As the operator of the NHTH, the grant recipient collects two types of data—PII, such as location of a particular trafficking situation and name of an alleged perpetrator, and non-personally identifying information, such as the city/state of signalers and how they learned about the NHTH. PII 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 does not collect or receive PII about signalers from the grant recipient. OTIP uses aggregate information received through this collection 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 to make a tip or access referrals. NHTH call specialists who field signals follow response protocols and may ask follow-up questions 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. NHTH call specialists 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), sex, 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 NHTH call specialist. However, only the information necessary to assist the signaler is explicitly requested. The NHTH grant recipient is not expected to adjust its response protocols for the purposes of the PPR collection. This means that NHTH call specialists 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, and sex is **never assumed** or collected (meaning, inputted into structured fields within the NHTH grant recipient's case management system) on the basis of inference. NHTH call specialists collect and record information as it is reported by signalers. For example, if an individual contacts the hotline as a potential victim of trafficking and reports their sex as male if asked about their sex, they will be recorded as "Male". If an individual uses a term other than Male or Female to describe their sex or the sex of a potential victim, or if a signaler does not provide their sex or the sex of the potential victim, then the individual's sex will be recorded as "Not Reported". 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 sex information about the potential victim may be collected by proxy.

In public-facing data products, demographic information pertaining to sex will only be reported in the aggregate as Male, Female, or Not Reported based on information as it is reported by signalers. Demographic and other potentially sensitive information is only collected when needed, meaning NHTH call specialists 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. NHTH call specialists 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 demographic characteristics such as their race/ethnicity, religious affiliation, or sex. Information about the unique vulnerabilities, trafficking experiences, and service needs of certain populations (e.g., migrant and seasonal workers, Indigenous communities, 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 appropriate way. For example, demographic information, particularly information about a potential victim’s sex, informs understanding of the intersection between sex and human trafficking (e.g., the sex plays in the risk for human trafficking; process of identification; interaction with education; social welfare; and criminal justice systems; access to resources experienced by men and boys, etc.). For these reasons, it is important for OTIP to collect granular information to monitor NHTH performance and responsiveness and for internal use and planning (e.g. to provide technical assistance to the NHTH grant recipient).

OTIP recognizes that information obtained through the NHTH 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 sensitive or identifiable 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. The NHTH grant recipient is required to store case information in an 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

The estimated number of respondents has been lowered to reflect review of operational data reviewed over the past five years. The updated estimate is an average number of respondents over the next three years based on that most recent data. The estimated time per response remains consistent but overall total estimates are lower due to the reduction in estimated number of respondents.

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
NHTH Performance	51,000	1	0.5	25,500	8,500	\$91.92	\$781,320

Indicators							
NHTH Grant Recipient	1	15	24.13	362	121	\$30.31	\$3,667.51
Totals:				25,862	8,621	-	\$784,987.51

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 2024) 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 (\$41.39), Legal Occupations (\$66.19), and Community and Social Service Occupations (\$30.31) is \$45.96. To account for fringe benefits and overhead the rate is multiplied by two which is \$91.92. The estimated annualized total cost to respondents (signalers) is \$91.92 times 25,500 hours or \$2,344,130.00.

The estimated annualized total cost to the record keeper (NHTH grant recipient) is estimated \$30.31 times 121 hours or \$3,667.51.

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 \$6,367.60.

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 \$54.01 per hour (job code 15-2041 and wage data from May 2024) and take 80 hours annually costing \$4,320.80 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 \$51.17 per hour (job code 19-3099 and wage data from May 2024) for an annual total of \$2,046.80.

15. Explanation for Program Changes or Adjustments

OTIP continuously monitors NHTH performance data received. The estimated number of respondents under this information collection has decreased following review of operational

data received over the past five years. The updated estimate excludes non-substantive signals and is based on the average number of substantive signals received by the NHTH over the course of the last five fiscal years. This value provides a more accurate estimate of the associated burden and is much lower than the initial estimate.

Significant data collection, and specifically, data collection related to the indicators approved under this collection, is not conducted on non-substantive signals, which include missed signals, hang-ups, prematurely terminated signals, wrong number/erroneous signals, and signals that are out of scope/not related to human trafficking or related forms of violence/victimization. The estimated time per response remains consistent but overall total estimates are lower due to the reduction in estimated number of respondents.

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), sex, 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' sex may be summarized with caveat language such as, "X percentage of potential victims who contacted the NHTH reported their sex as neither male nor female, or declined to provide their sex." 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 NHTH call specialists will not read this information to signalers.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.