

Trafficking Victim Assistance Program (TVAP) Data

**OMB Information Collection Request
0970 - 0467**

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

Summary

This request is for an extension with revisions of an approved collection, Office of Management and Budget (OMB) Control Number 0970-0467. Current OMB approval of the collection expires on February 28, 2026. Minor, nonsubstantive updates have been made to performance indicators under this collection to simplify response options and to bring the collection into alignment with the Office on Trafficking in Persons (OTIP) grant recipient reporting database, the Anti-Trafficking Information Management System (ATIMS). Additionally, based on review of performance data received, specifically the average number of clients served by funded recipients over the last four years, and the sunset of the Lighthouse: Services, Outreach, and Awareness for Labor Trafficking (Lighthouse) Demonstration Program in October 2025, burden estimates for this collection have been reduced.

1. Circumstances Making the Collection of Information Necessary

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.). Acting under a delegation of authority from the Secretary of HHS, the Administration for Children and Families (ACF), OTIP makes awards to grant recipients through the Trafficking Victim Assistance Program (TVAP) to provide time-limited comprehensive case management services to confirmed and potential victims of a severe form of human trafficking, as defined by TVPA, as amended, who are seeking or have received HHS certification. Case management services must be provided to qualified persons directly by full-time case managers that are staffed by TVAP prime recipients and may also be provided through a network of per capita service providers. TVAP is an umbrella term used to refer to two distinct programs: the Trafficking Victim Assistance Program (TVAP), which serves adult victims, and the Aspire: Child Trafficking Victim Assistance Demonstration Program. The performance indicators and data collection instruments covered under this information collection are applicable to both TVAP programs. Another TVAP program, the Lighthouse: Services, Outreach, and Awareness for Labor Trafficking (Lighthouse) Demonstration Program, sunset in October 2025.

This is an existing collection that is necessary to measure grant project performance, provide technical assistance to grant recipients, assess program outcomes, inform program evaluation, respond to congressional inquiries and mandated reports, and inform policy and program development that is responsive to the needs of victims. Information from this collection also enables OTIP to fulfill a provision in the TVPA of 2000, as amended, that requires the Attorney General to submit annually “a report on Federal agencies that are implementing any provision of this chapter” (22 USC 7103(d)) and to prepare a required annual report to Congress on U.S. Government activities to combat trafficking that is

prepared by the U.S. Department of Justice. Congress requires HHS and other appropriate Federal agencies to report, at a minimum, information on the number of persons who received benefits or other services under 22 USC 7105(b)(f), in connection with programs or activities funded or administered by HHS.

This request is for an extension with revisions of an approved and ongoing data collection under OMB Control Number 0970-0467. An overview of changes is provided in A8 and A15.

2. Purpose and Use of the Information Collection

The main purpose of this information collection is to enable OTIP to monitor grant recipients providing services to victims of a severe form of trafficking in persons, and to assess the extent to which grant recipients meet required program activities. The information collection captures information on participant demographics (e.g., age, sex, type of trafficking experienced, service location) and services provided, along with aggregate information on outreach activities conducted, subrecipients enrolled, and dollars spent per service. The information obtained through this collection allows OTIP to evaluate service delivery efforts, inform prevention programming, and monitor program outcomes. Additionally, this information enables OTIP to understand and disseminate insights related to human trafficking cases and trends to inform anti-trafficking strategies and policies. The information collected is also used to prepare the required annual report to Congress and the annual Attorney General's Trafficking in Persons Report, as noted previously.

3. Use of Improved Information Technology and Burden Reduction

Since this collection was last renewed, OTIP built and deployed 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 that define key terms and definitions within the system user interface. The ATIMS system reduces the amount of manual data entry for grant recipients, 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 recipients may track their progress towards targets. TVAP recipients will begin reporting within the system by the fourth quarter of fiscal year 2026.

4. Efforts to Identify Duplication and Use of Similar Information

The data to be collected relates to the OTIP TVAP grant recipients. As required under the funding opportunity, recipients must describe how TVAP funds will complement and not duplicate existing anti-trafficking efforts and services in the proposed implementation 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 TVAP 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

Not applicable.

6. Consequences of Collecting the Information Less Frequently

The information collected on clients enrolled in TVAP 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 (NOFO). 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 serve victims of a severe form of trafficking in persons, as well as the annual Attorney General's Trafficking in Persons Report.

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

Not applicable.

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 August 14, 2025 (90 FR 39192) and provided a sixty-day period for public comment. OTIP did not receive comments.

Consultation

OTIP continuously reviews performance data received and engages existing grant recipients providing services to victims of trafficking in persons, as well as federal grant project officers who manage these programs, 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 ATIMS development, and to identify ways to reduce the overall reporting

burden. For the purposes of this renewal, minor, nonsubstantive updates have been made to performance indicators to simplify response options or to bring the collection into alignment with ATIMS as described in A15.

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 submit a protocol, inclusive of relevant organizational policies and procedures, to prevent disclosure of confidential, private, or personally identifiable information concerning clients or their immediate family members without informed, written, and reasonably time-limited consent from the person whose information is sought. The protocols must also include the plan for how the full-time Case Managers (staffed by the prime), Regional Coordinators (staffed by the prime) and, if applicable, its subrecipient(s) (i.e., per capita service providers) to inform clients of the limits to confidentiality prior to disclosures (e.g., mandated reporting requirements, etc.). The prime recipient must ensure compliance with 45 CFR § 75.303(e) to take reasonable measures to safeguard their clients protected personally identifiable information. The protocol must also include a plan for how protected 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, will be collected and safeguarded. Grant recipients 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, as well as a plan for the disposition of such information at the end of the project period, as a condition of their awards. The prime grant recipient (and their subrecipients) must maintain confidentiality agreements/privacy disclosures explain what information will be shared through routine reporting to the funding organization (OTIP) for analysis, assessment of the program's success, congressional reporting, evaluation, and research. The grant recipients provide the information collected from their subrecipients, sharing a system generated client identifier in lieu of personally identifiable information such as the client's name or social security number.

11. Justification for Sensitive Questions

Based on broad consultation with existing grant recipients providing services to domestic victims of trafficking in persons, best practices identified by the National Human Trafficking Training and Technical Assistance Center (NHTTAC), and recommendations from the [U.S. Advisory Council on Human Trafficking](#), OTIP includes questions pertaining to clients' disability status, sex, and trafficking experience to better understand who is at risk of experiencing human trafficking, to inform program development, and to assess unmet service needs. 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 grant recipients are required to inform their subrecipients and clients of how information will be used through confidentiality agreements and privacy disclosures. All client-level information reported to OTIP is deidentified before it is received.

12. Estimates of Annualized Burden Hours and Costs

Burden Estimates

Based on review of performance data received, specifically the average number of clients served by funded recipients over the last four years, and the sunset of a TVAP program, the Lighthouse: Services, Outreach, and Awareness for Labor Trafficking (Lighthouse) Demonstration Program in October 2025, burden estimates for this collection have been reduced. The time to complete each form remains the same. The Victim Outreach form has been renamed to “Client Outreach” and the Categories of Assistance form has been renamed to “Client Service Costs” for respondent clarity and to bring the title of the forms into alignment with ATIMS.

Burden estimates were originally informed and calculated through consultation with existing grant recipients, through ATIMS system development efforts, and an environmental scan of human trafficking screening forms and protocols, 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. As it specifically relates to the client-level indicators, different screening forms and protocols may be leveraged by grant recipients depending on the target population to be screened, the environment where the screening will take place, and the professional background of the clinician or case manager conducting the screening, among other factors. Burden estimates were calculated based on the average amount of time required to populate all fields on the various forms after several indicators were removed (see section 15), however, clients served have the right not to disclose information and this information is not required to receive benefits and services under this grant program. These factors together mean that the estimates for grant recipients to report client-specific indicators may be slightly higher or slightly lower, depending on what information clients feel comfortable sharing upon intake.

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
Client Characteristics and Program Entry	5,300	1	0.75	3,975	1,325	45.28	59,996
Client Case Closure	5,300	1	0.167	885	295	45.28	13,357.60
Barriers to Service Delivery and Monitoring	120	4	0.167	80	27	45.28	1,222.56
Client Service Use	5,300	1	0.25	1,325	442	45.28	20,013.76

and Delivery							
Client Outreach	120	4	0.3	144	48	45.28	2,173.44
Subrecipient Enrollment	60	3	0.167	30	10	45.28	452.80
Client Service Costs	60	1	0.5	30	10	45.28	452.80
Estimated Annual Burden and Cost Total:					2,157	-	\$97,668.96

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2024, which is \$22.64 per hour. To account for fringe benefits and overhead the rate was multiplied by two, which is \$45.28.

https://www.bls.gov/oes/current/oes_stru.htm

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

The estimated annual cost to the federal government is \$7,447.80.

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 \$54.01 per hour (job code 15-2041 and wage data from May 2024) and take 100 hours annually costing \$5,401.00 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 \$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

This collection captures information on TVAP client demographics (e.g., age, sex, race/ethnicity), type of trafficking experienced (sex, labor, or both), types of services and benefits provided, along with aggregate information on outreach and public awareness activities conducted and subrecipients enrolled. Minor, nonsubstantive updates are proposed to performance indicators with this renewal. The revisions made to this collection, as summarized in full below, simplify response options and to bring the collection into alignment with ATIMS.

Indicators Removed

- Client Characteristics and Program Entry Form
 - Grant Eligibility Status: U.S. Citizen/Lawful Permanent Resident
- Client Service Use and Delivery Form
 - Benefits Received: Section 8/Permanent Housing Assistance, SNAP (Food Stamps), WIC, and Unknown response options
- Client Outreach Form
 - Target Population(s) data element

Indicators Renamed for Clarity

- Client Characteristics and Program Entry Form
 - Referral Source: District Attorney/State's Attorney/Victim Assistance response option changed to District Attorney/State's Attorney/Victim Services
- Client Service Use and Delivery Form
 - Services Received: Peer-to-Peer Support/Mentoring response option changed to Peer Support/Mentoring
- Barrier to Service Delivery Form
 - Lack of Cooperation of Client response option changed to Lack of Client Cooperation
 - Lack of In-House Procedures response option changed to Lack of Internal Procedures
 - Language Concerns response option changed to Language Barriers
 - Victims' Legal Status response option changed to Client Legal Status
 - Other Services (specify) response option changed to Other (specify)
- Client Case Closure Form
 - Reason for Case Closure: Determined not eligible response option changed to Determined ineligible for services
 - Reason for Case Closure: Lost contact response option changed to Lost contact with client
 - Living Situation Upon Case Closing data element changed to Living Situation at Case Closure
- Subrecipient Enrollment Form
 - Services Provided by Subrecipient: Peer-to-Peer Supporting/Mentoring response option changed to Peer Support/Mentoring
 - Services Provided by Subrecipient: Other Services (specify) response option changed to Other (specify)
- Client Service Use and Delivery Form
 - Services Received: Peer-to-Peer Supporting/Mentoring response option changed to Peer Support/Mentoring
 - Services Received: Other Services (specify) response option changed to Other (specify)

Indicators Collapsed for Simplification

- Client Service Use and Delivery Form
 - Benefits Received: SNAP (Food Stamps) and WIC removed as individual

response options and changed to new response option, Food Benefits (SNAP, WIC, Tribal Commodities)

- o Benefits Received: Section 8/Permanent Housing Assistance response option changed to new response option, Housing Subsidies (Section 8, HUD Vouchers)

General Changes to Terminology

- Victim Assistance changed to Victim Services
- Category of Assistance changed to Type of Service

16. Plans for Tabulation and Publication and Project Time Schedule

OTIP will conduct univariate analysis to describe the service population and ascertain patterns. Summary findings will be presented in briefings, infographics, fact sheets, federal reports, responses to congressional inquiries or Freedom of Information Act requests, and presentations.

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.