



Freedom Network USA

September 15, 2017

VIA EMAIL to TIPreport@state.gov and balls@state.gov

US Department of State
Office to Combat and Monitor Trafficking in Persons (JTIP)
1800 G Street NW, Suite 2148
Washington DC 20520

RE: Freedom Network USA Comments on the 2017 Trafficking in Persons Report

Dear JTIP Office:

The Freedom Network USA commends the US State Department for the release of the 2017 Trafficking in Persons (TIP) Report. We look forward to the government's continued commitment to addressing human trafficking and supporting survivors. We echo the sentiment of Ambassador Susan Coppedge in uplifting the work of helping "survivors pursue the justice they deserve and return to a life of their choosing, a life with dignity and free will."

The Freedom Network USA, established in 2001, is a coalition of 51 non-governmental organizations and individuals that provide services to, and advocate for the rights of, trafficking survivors in the United States. Our members include former prosecutors, civil attorneys, criminal attorneys, immigration attorneys, and social service providers who have assisted thousands of survivors from every walk of life. Prior to the release of the TIP Report, Freedom Network USA submitted input on the state of anti-trafficking efforts in the United States, based on the experiences of our members. We commend the inclusion of a number of these recommendations in the report, reflecting the reality of those working directly with survivors.

We note the importance of several specific successes highlighted by the Report including:

- DHS' efforts to expand access to Continued Presence through revised guidance;
- Increased focus on labor trafficking via employment-based visas, including data sharing between DHS and DOL, as well as publication of H-2B recruiters; and
- Improved integration of survivor advocates in decision-making, exemplified by the importance placed on the work of the Advisory Council.

We hope that these efforts continue to expand and grow more robust in the coming years. However, we remain concerned at the low number of Continued Presence grants issued to

victims of trafficking. Foreign national survivors rely on this temporary status to access emergency services and support while working to apply for long-term immigration relief. Despite continued calls to increase accessibility from the field, the number of survivors granted Continued Presence in 2016, including renewals, decreased from 2015. This is in direct contrast to an overall increase in identification, number of investigations and number of T Visas issued in the same time period. We strongly recommend collaboration between DHS and DOJ to prioritize an increase in the number of federal agents submitting Continued Presence applications in 2018.

The report also highlights the continued failure of both Congress and the federal government to give labor trafficking adequate attention. We are deeply concerned at the dismal 5.7% of human trafficking prosecutions initiated in 2016 involving charges of labor trafficking. The US government must increase training and funding at the federal, tribal, state, and local levels, coupled with specific objectives related to increased investigation and prosecution of forced labor crimes and identification of labor trafficking survivors so that the US may continue to meet minimum standards for the elimination of trafficking. Seventeen years after the TVPA became law, there continues to be no systematic effort to identify and address labor trafficking, and government agencies continue to lack the knowledge and capacity to engage in effective outreach, education and investigation of the most egregious forms of labor exploitation.

We also call on the federal government to effectively address the root causes of trafficking and exploitation: poverty, insecure housing, discrimination, and a broken immigration system. Victim identification is not prevention. Federal efforts must shift from general public awareness to tackling the issues that make populations vulnerable to exploitation in the first place. Without dedicating significant resources to uplifting vulnerable communities, exploitation will flourish and trafficking will remain pervasive.

For more information on Freedom Network USA experience and input, see <https://freedomnetworkusa.org/app/uploads/2017/09/FNUSAInput2017TIPReport-1.pdf>.

Sincerely,

A handwritten signature in black ink that reads "Jean Bruggeman". The signature is fluid and cursive, with a long horizontal flourish at the end.

Jean Bruggeman
Executive Director
Freedom Network USA