



# Freedom Network USA

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VIA EMAIL

## **RE: 2017 Human Trafficking Funding Recommendations**

Acting Director Roberts and Director Chon:

Freedom Network USA commends OVC and OTIP for providing critical services funding for human trafficking survivors. These services are life-saving for clients fleeing exploitation, and allow survivors to build a safe future for themselves and their families. We appreciate the dedication of your offices in administering these funds so effectively in the past. We will continue to advocate for increased levels of funding to meet the growing awareness of human trafficking and concomitant increase in identification of survivors. Unfortunately, the funding can also be confusing, contradictory, and insufficient. We believe that the growing needs require more funding, but also some new approaches.

Freedom Network USA is the nation's largest coalition of service providers and advocates working directly with human trafficking survivors in the US. We are committed to the human rights based approach to human trafficking, placing a trafficked person's priorities and narrative at the center of anti-trafficking work. We work to create a coordinated national system in which appropriate and effective high-quality services are available to any survivor, anywhere, anytime—regardless of legal status, geographic location, age, gender, sexual orientation, or type of trafficking experienced.

On behalf of our 51 members across the US, I respectfully submit the following recommendations as you engage in your program planning in the coming months and years:

- 1. Ensure Coordinated, Client-Centered, Program Requirements and Guidance**  
OVC and OTIP should take the lead in supporting trauma-informed, client-centered programs that include flexibility in the intensity and length of service provision, low barrier program entry, support for both direct victims and their immediate family members, comprehensive services that include sufficient funding for social and legal services, appropriate service provider staffing and training, and demonstrated language access policies.

Currently there are stark differences between the program guidelines issued by OVC and OTIP. For clients, this can be extremely confusing and distressing when the level and type of

services provided changes dramatically when they, for example, achieve Certification or move to a different city or state. We strongly recommend that **OVC** and **OTIP** develop consistent program guidance to create more parity in the services available to survivors.

As you know, some clients need only brief services while others have intense needs that may last for over a year. The strict service period and budget limits in the **TVAP Program**, for example, do not allow programs to design a service plan that is actually responsive to the needs and interests of the client.

## 2. Align and Coordinate Grant Programs

In order to provide comprehensive, victim-centered services, programs must engage in three separate activities.

**First**, they must **build collaborative, supportive relationships** with diverse organizations in their communities (including health care providers, housing programs, educational institutions, and ethnic and community based organizations).

**Second**, they must **conduct outreach** to identify trafficking survivors (both directly and in collaboration with partners).

**Third**, they must provide, either in-house or through referrals, **comprehensive legal and social services** (including medical and mental health care, housing, education and employment support).

We urge **OVC** and **OTIP** to design their programs to ensure support for all three activities, recognizing that the funding needed, capacity of organizations, and sophistication of local networks differ across the US. Grant programs must be designed to both build capacity in underserved areas, and support ongoing service and outreach needs in population centers. They must also allow grantees to combine funding sources in flexible ways to meet the needs of survivors. Grant programs should also be aligned to ensure that services are available when community outreach is funded. Therefore, outreach proposals should include a plan for providing services to identified survivors through other funding sources or partnerships.

The **OTIP Look Beneath the Surface Program** is an important resource focused on the first two activities. We recommend incorporating a two-tiered approach to this program, separating applicants from areas that do not yet have strong collaborations from those with developed coalitions. Applicants in the first tier should focus on developing collaborations and building the capacity of their partners to address human trafficking. These awards should be time limited (approximately 5 years) to support this phase of initial development, and include targeted technical assistance and mentoring. The second tier, for applicants in communities with developed collaborations, would provide ongoing training for partners and community organizations, and include significant direct outreach efforts designed to identify survivors. By separating the applicants in this way, **OTIP** could establish different outcome expectations, and strategically choose to invest in capacity building in underserved areas, while also supporting successful programs.

### 3. Vary Grant Award Levels to More Equitably Distribute Funds

We recognize that the current appropriations are simply insufficient to meet the needs of all trafficking survivors in the US. We also know that survivors are more likely to be identified (although not necessarily more likely to be trafficked) in urban areas with a concentration of service providers, law enforcement and community members that have received training to identify human trafficking. However, we also note that needs exist in all states and that limited grant funds must be divided as equitably as possible.

The **OTIP Trafficking Victims Assistance Program (TVAP)** per capita approach is appropriate only where there are no human trafficking programs, as it does not generally develop capacity for comprehensive outreach and services. Grants develop sustainable programs because organizations are able to hire full-time staff, and provide them with the training needed, to ensure a high standard of service provision. We recommend that **OTIP** return to their previous approach of funding both longer-term grants in areas that have documented client service needs, as well as a nation-wide per capita program to provide a flexible response to meet gaps in service provision, and to provide additional resources for unusually large cases that overwhelm local capacity. The per capita approach must include strong mentoring to ensure that providers appropriately serve this population. We recommend a regional approach to ensure the grantee is able to develop local relationships.

We recommend that **OVC** and **OTIP** integrate varied funding levels into their grant programs (and that **OTIP** return to providing grants, as mentioned above), including **Comprehensive and Specialized Services Programs** as well as the **Enhanced Collaborative Model**. Grants should give large programs the resources needed to support their large caseloads, and give smaller programs the stability needed to build their expertise. For example, new or small programs should be awarded a minimum of \$50,000 per year. Programs with a demonstrated history of serving a large number of survivors should be awarded grants of up to \$800,000 per year.

Alternatively, grants must be designed to allow large programs to seek multiple federal grants. The current design of the **OVC Comprehensive Services Grant** makes it difficult for programs to articulate their need for additional funding that is not duplicative. An agency may be providing comprehensive services, but have the capacity to serve a limited number of survivors because the award is capped at \$250,000 per year. If the award amount is not increased, the grantee must be allowed to otherwise articulate a limit to service (such as a total number of survivors to be served) to enable use of other funds (including **OVC Specialized Services Grants**) to expand capacity.

Additionally, program guidance must allow the provider flexibility to use other sources of funds to fill remaining gaps. The current program guidance that strictly limits enrollment of foreign national clients in either the **OVC** or **OTIP** grants based on their Certification status does not take into account caseload limitations. If **OTIP** continues to rely on the **TVAP** per capita model for all foreign national survivors, there should be additional flexibility to meet client load surges in **OVC** funded programs, especially those funded under current limits.

#### **4. Ensure Balanced Support of All Trafficking Survivors**

Survivors of labor and sex trafficking, US Citizen and non-citizen, adults and youth, of all genders and ages need services and support. We believe that it is critically important for **OVC** and **OTIP** to ensure that holistic programs exist across the US that serve all trafficking survivors regardless of the type of trafficking, gender, citizenship status or age of the survivor. We also recognize that specialized programs offer unique expertise and experience that compliment broader programs. We urge **OTIP** to consider integrating programs and services for US Citizens and non-citizens, and are eager to work with you to envision a new funding method that complies with the law but does not segregate survivors.

#### **5. Collaborate to Fund a Field-Driven National Resource Center**

As new providers emerge, and existing programs expand their services, there is limited support to ensure that programs are effective. A Human Trafficking Resource Center is a critical investment in proactive training and technical assistance. **OVC** and **OTIP** should collaborate to establish at least one national resource center, similar to the models used in the domestic and sexual violence fields. A field-driven Human Trafficking Resource Center would have strong connections with direct service providers, staff with experience in providing direct services and program development, and an understanding of federal grant funding which would enable the Center to provide realistic recommendations and provide effective training and mentoring to service providers nationwide. It must be survivor-informed and field-driven to ensure that it meets the needs of direct service providers and survivors.

The Human Trafficking Resource Center should develop standards of care and guidance on program evaluation in collaboration with **OVC** and **OTIP**. These standards should be integrated into the services grant program requirements. Standard evaluation metrics could provide federal agencies with a better understanding of the impact of their funding and emerging best practices.

The Human Trafficking Resource Center should host annual meetings for all **OVC** and **OTIP** funded service providers. The joint annual meeting would allow successes, best practices, and innovations to be shared; challenges to be deeply explored; federal priorities and changes to be communicated; and connections among providers to be made. The Human Trafficking Resource Center could also serve as a central distribution point for all federal training materials, including webinars, posters, videos, and other materials.

#### **6. Research, Data and Evaluation**

We commend **OVC** and **OTIP**'s commitment to research, data and evaluation. We encourage you to continue collaborating with NIJ to support research that has a real and immediate impact on the improved understanding of human trafficking and the delivery of effective, appropriate services. We recommend that you collaboratively explore options to better align the data collection requirements for **OVC** and **OTIP** funds. When providers are collecting the same types of data for both programs, the process is easier for providers and the data analysis is more meaningful for the nation. We also recommend that you develop joint guidance on program evaluation to support grantees in engaging in meaningful

evaluation that is useful for both the grantees and the government—including community needs assessments, and both process and outcome evaluations.

#### **7. Continue Evaluating the Enhanced Collaborative Model**

We commend OJP for providing additional training and technical assistance to **Enhanced Collaborative Model (ECM)** grantees. We recommend further evaluation to assess the effectiveness of the **ECM** approach and to identify best practices in Task Force development and operation. We are concerned about law enforcement agencies that seem to be using TVPA funds to support traditional Vice Unit operations, arrest victims, and fail to respond appropriately to all victims. We recommend that all law enforcement funding include a Special Condition to require grantees to implement specific strategies and written policies and procedures to avoid charging human trafficking victims. Law enforcement grantees should be required to submit reports detailing all citations and charges related to funded law enforcement activities. Additionally, a Special Condition should require that all grant-funded activities be designed to identify both traffickers **and victims**, working solely to identify potential traffickers should not be allowed. Finally, diversion courts and similar approaches that rely on the arrest of the victim, should not be funded with TVPA's victim services funds. Freedom Network USA feels strongly that survivors should never be ordered into services or face criminal penalties for actions resulting from their victimization.

We look forward to discussing these recommendations with you and working collaboratively with OVC and OTIP as you work to further strengthen and expand your human trafficking victim services.

Sincerely,



Jean Bruggeman  
Executive Director  
Freedom Network USA