



Freedom Network USA

December 19, 2022

Office of Management and Budget

Paperwork Reduction Project

OIRA_SUBMISSION@OMB.EOP.GOV

ATTN: Desk Officer for the Administration for Children and Families

RE: Human Trafficking Youth Prevention Education Demonstration Grant Program Process Evaluation, ICR Reference Number: 202211-0970-010

ACF Desk Officer:

Freedom Network USA (FNUSA) commends the HHS Office on Trafficking in Persons (OTIP) for evaluating the effectiveness of its Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program. Proper evaluation of this program's successes, failures, and potential harm is essential to ensuring government-funded trafficking prevention programs benefit communities and do not harm survivors. We understand that completing this information collection from educators participating in the HTYPE Demonstration Grant Program is necessary to meet this goal, and we appreciate OTIP's consideration of comments from FNUSA and other advocates.

FNUSA is the nation's largest coalition of service providers and advocates working directly with human trafficking survivors in the United States. 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. Our 87 members include survivors, former prosecutors, civil attorneys, criminal attorneys, immigration attorneys, and social service providers who have assisted thousands of trafficking survivors.

We offer these comments on the evaluation materials subject to OMB review to support OTIP's interests in ensuring the most effective programs. We are concerned by the potential sharing of personally identifiable information (PII) or details about the trafficking experiences of potential victims during the interview process. Protecting PII and the privacy of survivors of trafficking is essential. Information leaks can cause retraumatization and put survivors in potentially harmful situations. While there are guidelines in place in the supporting documents, we suggest considering further steps to ensure the PII of survivors and others involved is protected. Some specific recommendations for the Human Trafficking School Safety Protocol (HTSSP) Walk-through Interviews and Training Implementation Interview/Focus Group Guide are provided below.

HTSSP Walk-through Interviews

We recommend that the researchers include more robust guidance for respondents about avoiding sharing the PII of students or others involved in specific activations of the HTSSPs. It is more likely that respondents will share identifying details about people involved in

HTSSP activations in a verbal interview than in an online form with specific options for answers. This can be useful for evaluators to obtain more necessary details for the evaluation but also leave room for interviewees to share unnecessary information. When dealing with vulnerable populations, like potential human trafficking survivors, this unnecessary information can be personally-identifying and result in an increased risk of identification or harm for the survivor, even in seemingly controlled research settings. We recommend providing more precise details about the importance of refraining from sharing PII, examples of PII to increase understanding for the interviewee, and continual reminders built in throughout the interview as a preventative measure.

We also recommend reconsidering some of the broad, open-ended questions in the interview, as these provide more opportunities for sharing unnecessary information or PII. More contained questions with specific options for answers or more guidance on the types of answers sought can still provide the evaluators with the necessary information and decrease the risk of PII being shared.

Training Implementation Interview/Focus Group Guide

While this interview is not intended to focus on any activations of HTSSP or other potential human trafficking cases identified by the educators or staff, there is always a possibility of interviewees using these potential cases as examples to open-ended questions. We recommend adding instructions about avoiding PII to the guidelines for this interview format, similar to those provided in the HTSSP Walk-through Interviews. This addition is especially necessary since these interviews are intended to involve multiple participants who may not have the same knowledge about potential human trafficking survivors in the school.

FNUSA recognizes the critical role HHS plays in crafting strong human trafficking prevention programs. We applaud your dedication to ensuring educators are equipped to assist students who may be experiencing trafficking. We believe the recommended changes will help ensure students' PII is protected and reduce the potential harms of this program evaluation.

I can be reached at jean@freedomnetworkusa.org if you have any questions or need further information or explanation.

Sincerely,



Jean Bruggeman
Executive Director
Freedom Network USA