



# Freedom Network USA

October 20, 2023

Katherine Chon  
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VIA EMAIL

## **RE: FY2024 OTIP Human Trafficking Funding Recommendations**

Director Chon:

Freedom Network USA (FNUSA) thanks **OTIP** for continuing to provide critical funding for human trafficking service providers. These services are life-saving for survivors fleeing exploitation and allow survivors to build a safe future for themselves and their families. We appreciate the dedication of your office in administering these funds effectively and the hard work of your team. We appreciate the improvements you have implemented in the past few years to increase and improve access to trauma-informed services for all survivors.

As you know, 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. 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 96 [members](#) across the US, I respectfully submit the following recommendations for your program planning in the coming months and years:

### **1. Support Subrecipients with Consistent and Clear Grant Management Practices**

**OTIP** should require the grantee that administers **TVAP** and **ASPIRE** to communicate consistently in writing with grantees about changes to the grant structure or management. During the transition to the new grant structure last October, many subrecipients did not receive critical communications about accessing grant funds or re-enrolling clients. Subrecipients did not know if they would be selected to administer **TVAP** and **ASPIRE** in their communities until well into November or December, and the contracts were not executed until January. Subrecipient providers are now reporting inconsistencies around requests for extended client enrollment and funding levels for both client services and administrative funding.

Therefore, FNUSA recommends the following:

- The **TVAP** and **ASPIRE** grantee provide clear and consistent guidance to subrecipients about grant management practices, including how to request extensions and the criteria used to decide if they will be granted, the number of clients that can be enrolled, and administrative cost reimbursement criteria.
- Guidance be provided earlier in the grant term. Subrecipients did not receive the **TVAP**

and **ASPIRE** handbook until the end of July 2023, eight months after the start of the grant.

- Between grant awards, a clear transition plan should be prepared by the existing grantee and new grantee (even if they are the same organization) and shared with subrecipients at least three months before the end of the current grant. The new grantee should be ready to administer the program and ensure continuity of services for clients on Day 1 of the grant term, or **OTIP** should allow a bridge grant for the length of time needed for the transition to ensure survivors are not suddenly cut off from supportive services and funds.
- MOUs be sent to subrecipients and executed within one month of the start of the grant term. MOUs were not executed until almost four months after the start of the current grant term.

## **2. Provide Updated and Comprehensive Training and Technical Assistance on Grant Management**

Anti-trafficking organizations would benefit from more consistent training and technical assistance to meet **OTIP** grant requirements. Many organizations do not have federal grant experience and spend significant time trying to learn grant management skills on their own.

Therefore, FNUSA recommends the following:

- a. Provide increased training and support for **OTIP** grantees and subrecipients on:
  - Program development and management, including developing a new project and scaling a small project.
  - Grant management, including budget management and grant procedures.
  - Grant reporting processes, including ensuring grantees know the correct information to submit.
  - Trauma-informed workplace policies and procedures for trauma survivors in the workplace and for addressing vicarious trauma.
- b. Coordinate with **OVW** and **OVC** to provide TA to all grantees on language access issues, including language access minimum requirements, interpreter and translator qualifications, interpreter and translator ethics, best practices in working with interpreters and translators, and budgeting for language services.
- c. Provide more training, support, and flexibility around the match requirements. Match requirements are complicated, especially as programs are still rebuilding due to the pandemic. **OTIP** should provide additional training and technical assistance on meeting match requirements, including examples of a diverse array of match sources and sample documentation.

## **3. Support Comprehensive Programs with Trauma-Informed Service Provision**

**OTIP** should take the lead in supporting trauma-informed, client-centered, voluntary 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.

There continue to be stark differences between the program funding and guidelines issued by **OVC** and **OTIP**. For survivors, this can be extremely confusing and distressing when the level and type of services provided change dramatically when they, for example, achieve Certification or move to a different city or state. We strongly recommend that **OVC** and **OTIP** develop consistent programs and guidance to create more parity in the services available to survivors.

Therefore, FNUSA recommends the following:

- a. Require all grantees and subrecipients to submit their policies and procedures for service provision to a federally-funded training and technical assistance provider for review and feedback to ensure that policies are trauma-informed and client-centered.
- b. Require all direct services grant budgets (such as **DVHT-SO**) to include line items for a comprehensive array of needs (including food, housing, medical care, personal care items, and transportation). Even when partners are identified, there will be needs that are not met by available partners, and all providers must be prepared to budget for these expenses.
- c. Require all grants to include training and outreach plans to ensure collaboration with community-based organizations that are most likely to identify potential trafficking survivors. Require budget line items to support these community partners.
- d. Require all proposals to include a language access plan, a line item for interpreters and translators, and accessibility technology for spoken and signed languages. Programs that do not have these items in place are likely to engage in discriminatory conduct by failing to provide appropriate services to survivors who are not fluent in English or those who are D/deaf or hard of hearing.
  - i. Require a language access plan from all **TVAP** and **ASPIRE** subrecipients that meets the same standards. Additional funding for language access should be included for subrecipients. Language access services should not cut into a client's budget. Alternatively, an interpreter bank could be provided by and funded by the **TVAP** and **ASPIRE** grantee for all subrecipients.
- e. Coordinate with **OVW** and **OVC** to provide TA to all grantees and subrecipients on language access issues, including language access requirements, interpreter and translator qualifications, interpreter and translator ethics, best practices in working with interpreters and translators, and budgeting for language services.
- f. Support the use of multiple funding sources to meet the needs of all survivors. Grantees should be able to use funding from both **OVC** and **OTIP** as long as they meet both funding sources' objectives.
  - i. For example, when providers exceed the number of survivors they agreed to serve with one grant, they should be allowed to use another funding source to serve additional survivors.
  - ii. When **TVAP** or **ASPIRE** subrecipients receive a new **OVC** grant, they should be allowed to keep clients enrolled in **TVAP/ASPIRE** until their individual **TVAP/ASPIRE** budgets are exhausted. Requiring subrecipients to transition the client immediately is an unnecessary burden on both the subrecipient and the survivor.
  - iii. If a client begins **TVAP** or **ASPIRE** and moves into an **OVC** services area, allow the client to finish their **TVAP/ASPIRE** grant period before switching to **OVC** grantee services. to ensure continuity of services.

- g. Partner with **OVC** to support and require increased collaboration between human trafficking service providers and **HUD** CoCs (Continuums of Care) and local housing authorities by:
  - i. Connecting providers with rapid rehousing providers funded by **HUD**.
  - ii. Providing mandatory TTA for all **OTIP** grantees on housing topics, including understanding and accessing mainstream housing programs, collaborating with CoCs, partnering with culturally specific and non-specific organizations, and developing relationships with landlords.
  - iii. Host regional, joint training sessions with **OVC** and **HUD** to support collaboration and problem-solving to address the persistent challenges faced by trafficking survivors in finding and maintaining safe housing.
- h. Consider populations served when making grant awards. Priority should be given to programs that serve men and boys, labor trafficking survivors, and LGBTQIA populations.

#### **4. Offer Funding Opportunities that Reflect the Needs of Service Providers and Survivors**

Grant programs must be designed to both build capacity in underserved areas, as well as support ongoing service and outreach needs in population centers. Grant programs should be designed to support the expertise of service providers across the US. There is no one agency that has the expertise and capacity to serve trafficking survivors in all 50 states. The US victim service provider network is made up, almost exclusively, of local organizations with local or regional specialization. Grant programs must reflect this reality, and fund different programs and organizations across the US to support the best services in each locality.

FNUSA strongly believes that the **OTIP** per capita approach is appropriate only where there are no established human trafficking programs, as it does not generally develop the capacity for comprehensive outreach and services. Grants develop sustainable programs when organizations are able to hire and train full-time staff to ensure a high standard of service provision.

Therefore, FNUSA recommends the following:

- a. **OTIP** should return to its previous approach of funding both longer-term grants to local or regional organizations in areas that have documented client service needs, as well as a nationwide 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. These should be separate grants, not one award, to meet both types of needs.
- b. Funding must be distributed to both urban and remote areas through either targeted grant solicitations/NOFOs or priority grant-making to increase access to services throughout the US.

#### **5. Adjust TVAP and ASPIRE to Ensure Subrecipients are Better Able to Serve Survivors**

As you know, some clients need only brief services, while others have intense needs that may last for a few years. Due to widespread job losses, illness, and judicial delays (including delays in civil and criminal courts as well as immigration courts and service centers) as a result of the

pandemic, survivors often need services for even longer and are returning to services after months or years of independence. As inflation grows, survivors face even more precarious situations, increasing their risk of re-exploitation.

Under the current **TVAP** and **ASPIRE** grants, the lack of consistent communication and the new budget formula and reporting requirements are increasing barriers to building trust with clients and managing expectations. Subrecipients are best able to serve survivors when they are able to provide them with accurate information and manage expectations upfront. The current requirement to apportion all costs (including case management, administrative, and client services) to each survivor is burdensome and will lead to inaccurate assumptions about the ‘true costs’ of serving trafficking survivors. FNUSA members report that they are using other funding sources to cover the real costs of administering services because the reporting requirements are so burdensome.

If **OTIP** Continues to Utilize the **TVAP** and **ASPIRE** per capita model, FNUSA Recommends:

- **OTIP** and USCRI should hold a listening session with subrecipients for feedback on the new budget formula and adjust the formula to maximize the amount of funds that go directly to clients. FNUSA members report that the current formula has resulted in lower and less standardized client budgets, making it difficult for subrecipients to meet clients' needs and develop reliable case planning.
- Provide more information about how the grant funds are divided between operations for the grantee and funds that support subrecipients and survivors.
- Improve communication from USCRI regional offices with subrecipients. All USCRI staff should be required to respond to subrecipient emails and requests within two weeks. When staff turnover occurs within USCRI regional offices, subrecipients should be notified within a week. New regional officers should be required to reach out to subrecipients within two weeks of their start date. Subrecipients are expected to respond within 48 hours to referrals, but some wait over a month for an answer to time-sensitive emails from USCRI staff, leaving them unable to provide reliable services to survivors.
- Separate the budget line items for administrative and case management costs for subrecipients. Direct case management staff time is only one part of the required support for survivors. Subrecipients must also provide budget analysis, data management, and reporting to USCRI. Many of those tasks are not easily ‘assigned’ to a specific survivor or easy to apportion among survivors. Some of those expenses are incurred after the survivor has left services or has reached the end of their **TVAP** or **ASPIRE** service period.
- Reduce the reporting burden of administrative costs. Subrecipients have limited grant funds through **TVAP** and **ASPIRE** and have to cover the costs of the significant time spent reporting on administrative costs.
- Ensure sufficient coverage of service areas to meet the needs of clients. Subrecipients should not be asked to serve clients outside of their established service areas. USCRI should bring in additional subrecipients to fill in service gaps. If USCRI is unable to find additional providers, subrecipients should be paid a premium for accepting a client outside of their service area.
- Return to hosting monthly regional calls for subrecipients. Subrecipients are no longer aware of other **TVAP** and **ASPIRE** subrecipients in the area, making it impossible to

connect with each other. Trust among the service providers in a region is essential to the referral process.

- Improve the speed at which budgets are provided to subrecipients. With budget approvals now occurring through Steadfast, subrecipients have longer wait times for approvals and to get cash to clients in desperate need of assistance.

## **6. 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 National Human Trafficking Resource Center is a critical investment in proactive training and technical assistance. The domestic and sexual violence fields have invested in national training and technical assistance to support the development of high-quality services, standards for evaluation and research, and to build a more collaborative environment for providers.

FNUSA recommends the following to address these needs:

- a. **OVC** and **OTIP** should collaborate to establish at least one national resource center that is field-driven, connected to direct service providers, staffed by those with direct services, lived, and program development experience, and an understanding of federal grant funding.
- b. The Center could serve as a central distribution point for all federal training materials, including webinars, posters, videos, and other materials.
- c. The Center should provide extensive, pro-active training and technical assistance to all grantees and subrecipients to ensure that voluntary, victim-centered, non-discriminatory services are being provided with federal funds.

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

We commend **OTIP**'s commitment to research, data, and evaluation. We encourage you to continue collaborating with **NIJ** and **OPRE** to support research that has a real and immediate impact on the improved understanding of human trafficking and the delivery of effective, appropriate services. The research should focus on supporting better identification of survivors, establishing more effective services, and improving outreach and identification of survivors.

Therefore, FNUSA recommends the following to address these needs:

- a. All research grants should be required to provide guidance on how to put the research into practice, which is developed in coordination with a service provider.
- b. Require that research grants include paid consultants with lived experience to guide the design, implementation, analysis, and application of the research.
- c. 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.
- d. Develop joint **OVC** and **OTIP** 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. Grant solicitations should clearly state if research and/or evaluations are required and if a minimum amount of grant funds must be budgeted for that purpose.
- e. For desk audits and monitoring of **TVAP** and **ASPIRE** subrecipients, the grantee and external researchers should not be allowed to request or require that program participants participate in interviews. Survivors may feel obligated to participate even if they are uncomfortable, and this practice places undue pressure and burdens on those with the least power.

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

Sincerely,

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

Jean Bruggeman  
Executive Director  
Freedom Network USA