



Freedom Network USA

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VIA EMAIL to tipreportUS@state.gov

Rachel Poynter
Acting Director
US Department of State
Office to Combat and Monitor Trafficking in Persons (JTIP)
2201 C Street NW, SA-09 Suite NE3054
Washington DC 20520

RE: Addendum to Freedom Network USA's Input for the 2025 Trafficking in Persons Report

Dear Acting Director Poynter:

Freedom Network USA (FNUSA), established in 2001, is a coalition of over 100 non-governmental organizations and individuals that provide services to and advocate for the rights of trafficking survivors in the US. Since the enactment of the Trafficking Victims Protection Act of 2000 (TVPA), FNUSA members have worked to ensure that trafficking survivors receive the full array of legal and social services needed and that they are engaged in ensuring effective implementation of the law. FNUSA members include survivors who experienced both sex and labor trafficking in the US, civil attorneys who have brought cutting-edge lawsuits against traffickers, criminal attorneys who have represented survivors wrongly charged with a crime, immigration attorneys who have represented thousands of individuals granted T and U visas, and social service providers who have assisted thousands of survivors — both US citizens and foreign nationals, and minors and adults, across the gender spectrum.

In light of policy changes, drastic cuts, and threats to anti-trafficking programs in the last two months, FNUSA offers the following addendum to our previously submitted input for the 2025 US narrative to provide a more complete picture of efforts to combat trafficking during the reporting period.¹

¹ FNUSA, "Freedom Network USA's Input for the 2025 Trafficking in Persons Report," 1/2025, <https://freedomnetworkusa.org/app/uploads/2025/02/FNUSA-2025-TIP-Report-Input.pdf>

Contents

Requirements under the Trafficking Victim Protection Act.....	2
Victim Services	3
Immigration Protections	4
Labor Rights and Protections	7
Attacks on Survivors and Vulnerable Communities.....	7
Research Cuts.....	8
International Program Shutdowns Impacts in the US	9

Requirements under the Trafficking Victim Protection Act

Advocates and Members of Congress came together to establish the Victims of Trafficking and Violence Protection Act of 2000 (TVPA) to ensure that survivors of trafficking in the US are protected and have access to victim services, law enforcement has the tools to investigate and prosecute traffickers, and the US Government invests in preventing human trafficking. The protections for survivors established in the first TVPA and subsequent reauthorizations were some of the first in the world and exemplified the United States' leadership in addressing human trafficking. The recent attacks on social services, the legal profession, and the rights of immigrants, LGBTQ+ individuals, and Black and Brown communities in the US are quickly degrading the rights of trafficking survivors and forcing victims underground.

The TVPA established crucial protections and without them, the US would hand impunity to traffickers and prevent victims from seeking safety. The victim services programs established under the TVPA are the backbone of the US anti-trafficking response. They have saved thousands of lives and federally-funded human trafficking service providers are often the only way for survivors to access services in their state. The TVPA includes protections and services for all survivors regardless of immigration status because Congress understood that immigrants are unable to come forward to law enforcement or seek safety if they are trapped by fear of deportation.

Attacks on service providers' ability to serve all survivors, attorneys' ability to represent survivors seeking T visas, and vulnerable communities are in contradiction to the TVPA. Full implementation of the threats to cut access to services, impede potential witnesses from coming forward to law enforcement, and prevent survivors from accessing legal protections indicates the US Government is retreating from its commitments to address human trafficking.

Victim Services

Looming threats to victim services funding for human trafficking programs have resulted in panic and loss of trust with clients. The temporary pause on federal funding on January 27, 2025,² created a situation in which survivors could not trust the providers they count on for necessary emergency assistance. This trust is critical to ensure survivors stay connected with services and build resilience to re-exploitation. Even when the pause was lifted, many grantees faced significant delays in accessing federal funds. The Trafficking Victims Assistance Program (TVAP) administered by the Department of Health and Human Services (HHS) was unable to draw down funds until mid-February to pay for survivors' emergency housing, childcare, health and mental healthcare, and food.

Since the January 27th memo, service providers across the country have faced the threat of their programs being shut down or funding pulled as federal agencies review grants for compliance with new vague Executive Orders. Multiple programs that serve immigrant survivors have faced stop-work orders, contract lapses, and funding cuts that are creating immense gaps in access to services and legal counsel across the country.³ Without services and legal representation, immigrant survivors are unlikely to come forward to seek safety-planning resources or report to law enforcement, meaning they will stay in trafficking situations for longer and law enforcement will be unable to investigate trafficking cases.

As the review of programs has continued, federal grantees have received vague and confusing guidance from grant monitors to comply with Executive Orders on DEI, gender, and immigration. Granting agencies have refused to approve grant materials, prevented TTA providers from providing training or technical assistance to grantees, and requested grant materials be censored. Few new policies or formal guidance have been provided, resulting in guidance for grantees varying substantially even within agencies, making it impossible for grantees to comply with policy changes or complete grant deliverables.

² OMB Memo M-25-13, issued 1/27/2025, <https://www.nytimes.com/interactive/2025/01/27/us/omb-memo.html>

³ Presidential Memo on Preventing Abuses of the Legal System and the Federal Court, 3/22/2025, <https://www.aila.org/library/presidential-memo-on-preventing-abuses-of-the-legal-system-and-the-federal-court>; NIJC, "DOJ's Forced Pause of Vital Legal Programs for Immigrants Cuts Off a Lifeline for People Navigating a Complex and Punitive Immigration System," 1/28/2025, <https://immigrantjustice.org/press-releases/dojs-forced-pause-vital-legal-programs-immigrants-cuts-lifeline-people-navigating>; Didi Martinez and Julia Ainsley, "Legal organizations told to stop federally funded work for unaccompanied migrant children," 2/19/2025, <https://www.nbcnews.com/politics/national-security/legal-organizations-told-stop-federally-funded-work-unaccompanied-migr-rcna192828>; Alliance for Justice, "The Impact of Government Funding Cuts on Unaccompanied Children and the Role of Nonprofits in Fighting Back," 4/1/2025, <https://afj.org/article/the-impact-of-government-funding-cuts-on-unaccompanied-children-and-the-role-of-nonprofits-in-fighting-back/>

If funding is cut to federally funded human trafficking services, the already problematic gaps in service access across the country would be deeply exacerbated. Rural areas would likely lose all sources of victim services. Most victim service providers are small agencies that rely on federal funding to stay open and provide survivors with emergency services.⁴ The need for victim services that are specialized to specific communities' needs, including the types of trafficking most common in the area, are critical to ensuring survivors are able to seek safety. There are already significant gaps in services to rural areas, men and boys, LGBTQ+ survivors, and culturally specific services.⁵ Cutting federal funding to any victim services programs will ensure that survivors are unable to escape trafficking and enable the exploitation of vulnerable communities.

Another concerning issue is the shutdown of five HHS regional offices.⁶ These offices serve as a critical touchpoint for accessing social services across the country, especially for survivors in rural areas.

Immigration Protections

The US immigration system has long fueled human trafficking by making immigrants more vulnerable to exploitation through easily exploitable work visas, lack of access to social safety net protections, and lack of enforcement of workers' rights. The attacks on immigrants' ability to exist safely in the US since January 20, 2025, have pushed immigrants underground, where they are unable to access necessary services that protect them from trafficking. Policies that limit the ability of service providers or attorneys to serve immigrants do nothing to protect people and instead, ensure immigrants will be trafficked.⁷ Survivors are routinely left without legal status due to their trafficking situation when, for example: employers prevent victims from leaving the US before their visas expire, provide victims with fraudulent immigration documents, take actions that result in the revocation of the victim's status, fail to submit required information to DHS, or withhold their immigration documentation.

⁴ Emily Wright and Claire Ponder Selib, "Cutting Federal Funding for Victim Service Providers Jeopardizes Americans' Safety," *Urban Institute*, 3/25/2025, <https://www.urban.org/urban-wire/cutting-federal-funding-victim-service-providers-jeopardizes-americans-safety>

⁵ U.S. Advisory Council on Human Trafficking, "2024 Annual Report," 12/2024, https://www.state.gov/wp-content/uploads/2024/12/United-States-Advisory-Council-on-Human-Trafficking-2024-Report_508-FINAL.pdf

⁶ HHS, "HHS Announces Transformation to Make America Healthy Again," 3/27/2025, <https://www.hhs.gov/press-room/hhs-restructuring-doge.html>

⁷ Executive Order 14218 of 2/19/2025, 90 FR 10581;

Presidential Memo on Preventing Abuses of the Legal System and the Federal Court, 3/22/2025, <https://www.aila.org/library/presidential-memo-on-preventing-abuses-of-the-legal-system-and-the-federal-court>; NIJC, "DOJ's Forced Pause of Vital Legal Programs for Immigrants Cuts Off a Lifeline for People Navigating a Complex and Punitive Immigration System," 1/28/2025, <https://immigrantjustice.org/press-releases/dojs-forced-pause-vital-legal-programs-immigrants-cuts-lifeline-people-navigating>

Attacks on immigrants with any visa status or lack of status, always result in the deportation of survivors back to dangerous conditions, provide new tools for traffickers to coerce victims, and prevent survivors from coming forward. When asylum is inaccessible, survivors will be abused and killed. When survivors are unable to find an immigration attorney, they will be unable to come forward and access victim services. When survivors fear coming forward, they will stay in trafficking situations longer where they face abuse and potential death.

Service providers for immigrant communities have faced targeted attacks that prevent them from providing adequate services to survivors. On February 18, 2025, the legal services program for unaccompanied children received a stop work order.⁸ While the order was later rescinded, the program's contract ended on March 21, 2025, without a renewal in place.⁹ Currently, a temporary restraining order is in place ordering the restoration of the program,¹⁰ but legal challenges are ongoing, and legal services that protect 26,000 children from trafficking are at risk. An additional stop-work order on January 22, 2025, on legal access providers providing know-your-rights education and legal assistance to undocumented immigrants caused furloughs and layoffs of staff at providers across the country.¹¹ These types of programs are often a lifeline and crucial place for survivors to be identified and connected with help. The stop-work order was rescinded after a temporary restraining order and a court order for funding to be resumed. Even brief periods of service reduction prevent survivors from seeking help and dissolve trust with clients.

Attempted attacks on attorneys who work with immigrants are also creating ripple effects for human trafficking survivors. Immigration attorneys are in a critical place to help identify survivors of trafficking and connect them with lifesaving services. These attorneys also help survivors apply for T Visas, which offer crucial temporary protections for immigrant survivors who come forward to law enforcement. Attorneys have an ethical duty to work with people of all immigration statuses to ensure they are able to access the legal remedies available to them.

⁸ Acacia Center for Justice Urges Immediate Restoration of Unaccompanied Children Program, 2/18/2025, <https://acaciajustice.org/acacia-center-for-justice-urges-immediate-restoration-of-unaccompanied-children-program/>

Experts Say Stop Work Order on Unaccompanied Kids Program is Cruel, 2/20/2025, <https://firrp.org/experts-say-stop-work-order-on-unaccompanied-kids-program-is-cruel/>

⁹ NIJC condemns Trump administration's renewed attempt to dismantle legal representation for unaccompanied children, 3/21/2025, <https://immigrantjustice.org/press-releases/nijc-condemns-trump-administrations-renewed-attempt-dismantle-legal-representation>

¹⁰ United States District Court Northern District Of California, Case No. 25-cv-02847-AMO Order Granting Plaintiffs' Motion For Temporary Restraining Order Re: Dkt. No. 7, <https://justiceactioncenter.org/wp-content/uploads/2025/04/0033-Order-GRANTING-TRO.pdf>

¹¹ NIJC, 1/28/2025, <https://immigrantjustice.org/press-releases/dojs-forced-pause-vital-legal-programs-immigrants-cuts-lifeline-people-navigating>

Criminalizing them for doing so will result in more survivors being unable to access help and will discourage survivors from coming forward at all.

The T Visa is an essential component of the US approach to human trafficking because it serves to protect survivors, prevent their re-exploitation, and give law enforcement more tools to investigate human trafficking. The processing times for the visa have slowed significantly in the last year. The current processing time sits at 20.5 months, leaving survivors waiting for longer without sufficient protections. The program received a long-needed update in the 2024 T Visa Final Rule to provide survivors with bona fide applications with deferred action and employment authorization, so they can safely work and provide for themselves in the US while they await their T Visa decision. Since the rule's implementation, survivors have been granted Bona Fide Determination (BFD) in accordance with the rule, but USCIS has not issued the corresponding Deferred Action or Employment Authorization Documents for survivors, leaving them without the ability to work legally or protection from removal. USCIS has also administered arbitrary denials of BFDs with no rationale provided. Recently, a concerning trend has emerged of BFDs being denied on national security grounds with no explanation. In addition, processing times for Adjustment of Status for survivors have increased to 38.5 months, presenting an immense delay that puts survivors in danger.¹² Adjustment of Status processing times for similar visa categories is significantly shorter. The U Visa processing times at the Vermont Service Center (where the T Visa is adjudicated) are 28.5 months despite the much larger number of applications for the U Visa.¹³ For asylum-based applications, the processing time is less than half of the T Visa's at 15.5 months.¹⁴ There are also delays in applications for Early Adjustment of Status for survivors who meet the eligibility criteria. Delays in administering certification letters from the DOJ and delays in processing applications from USCIS have meant survivors face significant waits for Adjustment.

Continued Presence (CP) is another critical protection for immigrant survivors who come forward to report to law enforcement. While CP applications rarely face processing issues or issues with denials, CP can only be granted when requested by federal law enforcement. Most of these requests come from Homeland Security Investigations officers who have been reassigned into immigration enforcement activities away from human trafficking

¹² Processing time for Application to Register Permanent Residence or Adjust Status (I-485) at Vermont Service Center based on an approved T Visa, accessed at: <https://egov.uscis.gov/processing-times/>

¹³ Processing time for Application to Register Permanent Residence or Adjust Status (I-485) at Vermont Service Center based on an approved U Visa, accessed at: <https://egov.uscis.gov/processing-times/>

¹⁴ Processing time for Application to Register Permanent Residence or Adjust Status (I-485) at Vermont Service Center based on a grant of asylum more than 1 year ago, accessed at: <https://egov.uscis.gov/processing-times/>

investigations.¹⁵ Without protections for witnesses to encourage them to come forward, they will stay in trafficking situations for longer and law enforcement will lack the witnesses needed to investigate and prosecute traffickers.

Labor Rights and Protections

Enforcement of labor rights and remedies for workers are critical components of a thorough anti-trafficking response. Without strong enforcement efforts and investigations, governments cannot identify employers who are exploiting their workers. Department of Labor (DOL) investigators are in an important and useful position to identify trafficking survivors and connect them with necessary services. Planned mass layoffs at DOL will mean fewer survivors are identified and people who are vulnerable to trafficking working with abusive employers will be less likely to access help. Traffickers abuse with impunity when workers do not understand their rights and there is weak labor law enforcement.

Attacks on Survivors and Vulnerable Communities

Human trafficking can only be addressed if the vulnerabilities of specific communities are also addressed. Instead of assisting vulnerable communities with access to the services they need to survive, the US Government has changed course to attack the rights of marginalized communities. Any exclusion from access to human rights enables human trafficking.

Attacks on the rights of the LGBTQ+ community, especially transgender individuals, are intended to exclude them from access to full human rights and make the community a scapegoat for societal ills. This will make LGBTQ+ individuals more vulnerable to human trafficking. Recent Executive Orders that attempt to erase trans and gender-expansive individuals from government materials, restrict access to lifesaving healthcare, refuse to recognize changed gender markers, and restrict access to education about the LGBTQ+ community, will put these communities at increased risk of violence and prevent anti-trafficking efforts from reaching them.¹⁶ For example, the Department of State revoked a contract with experts with lived experience designed to bring the concerns of LGBTQ+ survivors and best practices in assisting them to the 2025 TIP Report.¹⁷ This erasure of LGBTQ+ survivors does nothing to help survivors of trafficking and prevent service providers and governments from improving their efforts to address human trafficking. Silencing communities does not erase them, it forces them into isolation that fuels trafficking and exploitation.

¹⁵ Reuters, 3/22/2025, “Thousands of agents diverted to Trump immigration crackdown,” <https://www.reuters.com/world/us/thousands-agents-diverted-trump-immigration-crackdown-2025-03-22/>

¹⁶ Executive Order 14168 of January 20, 2025, 90 FR 8615

¹⁷ Katie McQue, “‘People will die’: alarm as Trump’s DEI rollback hits anti-trafficking efforts,” 3/21/2025, <https://www.theguardian.com/law/2025/mar/21/anti-trafficking-race-lgbt-immigration-demographics>

BIPOC communities are also facing attacks on their rights to exist and thrive. Racist attacks on DEI initiatives are meant to silence and suppress Black and Brown voices. The lack of definition of what DEI actually means has resulted in attacks on people of color for being in leadership positions, erasure of educational content about leaders of color, and censorship of government-funded content about the unique needs of specific communities. Again, attempting to silence or erase communities does not make them disappear, it just makes them more vulnerable to violence. These attacks are likely to impact human trafficking service providers as many are utilizing data-driven, effective, community-based approaches. These create more effective programs to address human trafficking by ensuring survivors have resources that are actually beneficial to them and their communities. Without culturally specific and community-driven programs, funding spent on victim services is less effective and more harmful to survivors.

The shutdowns of programs designed to serve or represent specific communities, including offices combatting gender-based violence, contracts evaluating the unique needs of specific communities, and equity-focused initiatives also have direct impacts on survivors working in these programs. The US has made significant efforts toward ensuring survivors are able to find work in their fields of expertise. These program losses also mean survivors are losing their jobs as government consultants, staff at NGOs, and researchers. Survivors led the efforts to have their expertise recognized, and are now facing economic uncertainty.

Research Cuts

For all victim services, law enforcement, and prevention efforts, strong research into the efficacy of programs is essential. The US trafficking response needs evaluation across all programs to ensure that federal funds are being spent appropriately. However, cutting funding for research into human trafficking, related forms of violence, and health impacts, will result in the use of less effective services and prevention efforts. Funds for research through the National Institute of Justice, Centers for Disease Control and Prevention, Bureau of Justice Statistics, and National Institute of Health have been cut and will result in resounding impacts across all anti-violence programs. Without effective research, survivors will be left with limited services that do not meet their needs, prevention efforts will be ineffective, and law enforcement will not be able to improve investigations. Trafficking is not an isolated problem and the US needs to invest in studies focusing on sexual and reproductive health, substance use, mental health services, and education to ensure our approach to ending trafficking is comprehensive. In addition, many canceled grants included training elements that ensure the next generation of researchers are able to address difficult social problems and inform better federal spending.

International Program Shutdowns Impacts in the US

The cancellation of international aid programs and programs designed to reduce trafficking globally have had resounding impacts in the US. The shutdown and cancelation of the International Organization for Migration T Visa resettlement program¹⁸ has left trafficking survivors in the US stranded alone without family members and has revoked funding to assist survivors in the US with voluntary repatriation to their home countries. The TVPA recognized family reunification as a lifesaving form of support for trafficking survivors who have come forward to report their experiences of exploitation. Ending this program prevents this crucial service from taking place and puts survivors in danger without proper support systems. The US Government also recently shut down all of the DOL's International Labor Affairs Bureau's grant programs designed to prevent child labor and forced labor abroad.¹⁹ These programs are crucial to ensuring US trade partners produce goods that do not involve child labor and do not undercut US-based production of goods with cheap forced labor. Without these programs in place, the US will be removing incentives to prevent forced labor in supply chains around the world, tainting imports into the US with child and forced labor.

We hope this additional input will be useful in your evaluation of the US response to trafficking. Thank you for your time and attention to these matters. Please contact me (emma@freedomnetworkusa.org) if you have any questions or need further information.

Sincerely,



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Freedom Network USA

¹⁸ IOM, "Family Reunification for Victims of Trafficking through IOM,"

<https://migrationnetwork.un.org/practice/family-reunification-victims-trafficking-through-iom>

¹⁹ Global Unions, "Global Unions condemn the attacks on U.S. federal employees and the elimination of the crucial ILAB program," 4/7/2025, <https://www.ei-ie.org/en/item/29658:global-unions-condemn-the-attacks-on-us-federal-employees-and-the-elimination-of-the-crucial-ilab-program>;

Markets Insider, "Solidarity Center Statement on ILAB Program Elimination," 3/27/2025,

<https://markets.businessinsider.com/news/stocks/solidarity-center-statement-on-ilab-program-elimination-1034522279>