



Freedom Network USA

May 29, 2025

Submitted via reginfo.gov

RE: Submission for Office of Management and Budget Review; Request for Certification of Adult Victims of Human Trafficking, OMB no. 2025-07374

OMB Officer:

Freedom Network USA, established in 2001, is the nation's largest coalition of non-governmental organizations and individuals providing services to and advocating for the rights of trafficking survivors in the United States. FNUSA members include attorneys, survivors, academics, and service providers who provide direct services to survivors across the country.

The Request for Certification of Adult Victims of Human Trafficking (RFC) form is a critical tool for advocates to ensure survivors are connected with the resources necessary for them to avoid re-exploitation. While US citizen survivors are already eligible for public benefits that help them recover from trafficking, non-citizens are granted access to some benefits so they can also seek lifesaving services and reduce vulnerabilities to further exploitation. These benefits are critical to survivors' ability to choose to come forward to report. The certification process through the Office on Trafficking in Persons ensures that the US provides basic social services to all survivors.

LGBTQ+ individuals are placed at heightened risk of trafficking in the US due to systemic marginalization. All survivors need access to social services that help them rebuild financial stability and seek safety. Restricting access to these services prevents survivors from escaping and can force them back into exploitative situations when they have no other options. Policies that prevent certain communities from accessing lifesaving services enable trafficking by forcing survivors into vulnerability.

The unnecessary and harmful change made to the RFC form in this submission does nothing to help OTIP determine eligibility and instead discourages LGBTQ+ survivors from seeking help. Removing the option for "another gender" under the Gender section will prevent LGBTQ+ survivors from accessing services for which they are eligible and the US Government is legally obliged to provide. Erasing the option for survivors to select a gender other than male and female does nothing to help trafficking survivors. Instead, it creates an environment in which LGBTQ+ survivors fear coming forward and are forced to remain in trafficking situations for longer, enabling human trafficking.

This change to the RFC form should not be accepted, and the previously approved version of the form should be reinstated to prevent unnecessary confusion and potential restriction of access to certification for survivors in need of social services.

We hope OMB will consider our suggested changes to ensure all survivors can access the services they need to survive. Thank you for considering these comments. Please reach out to me at emma@freedomnetworkusa.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Emma Ecker". The signature is fluid and cursive, with the first name "Emma" being more prominent than the last name "Ecker".

Emma Ecker
Senior Policy Specialist
Freedom Network USA