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# TIP Report 2022 Submission

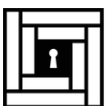
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**REPORT SUSPECTED TRAFFICKING**  
**IF YOU ARE A VICTIM, OR KNOW SOMEONE WHO IS,**  
**PLEASE CALL THE NATIONAL HOTLINE AT 1-888-373-7888**  
**OR TEXT "HELP" OF "INFO" TO BEFREE**



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# FORWARD

July 20, 2022 - This week, the United States Department of State released the 2022 Trafficking in Persons Report. This report is an integral part of understanding the state of anti-human trafficking work, both domestically and internationally. Safe House Project was privileged to contribute information on the incredible work being done in the U.S., and make recommendations for continued improvement in the prevention of trafficking, protection of victims and survivors, and prosecution of traffickers and buyers.

Safe House Project outlined several areas for improvement that were included in the TIP Report, including:

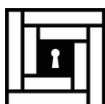
- The importance of survivor leader involvement in training, policymaking, and other NGO operations.
- Equity in survivor care, including those with specialized needs.
- Trafficking-specific training for law enforcement officers and judges, as well as healthcare workers.
- An evaluation of the effectiveness of training provided.

In addition to our recommendations, the TIP Report outlined several other recommendations that align to Safe House Project's mission, vision, and values including:

- Implementation of trauma-informed care in all areas of your organization.
- Utilization of ethical storytelling, giving survivors autonomy in sharing their stories.
- Compensation of survivors for their time and input.
- Engage in economic empowerment opportunities for survivors throughout your organization, including seeking survivor consultants.
- Understand the impacts of complex trauma as they relate to the workplace.
- Encourage self-care for those working in the anti-trafficking industry.
- Acknowledge diversity in survivor demographics.
- Identify and address barriers, particularly for marginalized, underrepresented, and underserved survivors.

The 2022 TIP Report can be viewed [here](#).

<https://www.state.gov/wp-content/uploads/2022/04/337308-2022-TIP-REPORT-inaccessible.pdf>



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# SUMMARY

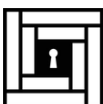
## Over the past year, what were the greatest deficiencies in the government's anti-trafficking efforts? What were the limitations on the government's ability to address human trafficking problems in practice?

One of the greatest deficiencies in the U.S.'s anti-trafficking efforts is the lack of equal access to state and federal funding, which affects a human trafficking survivor's access to quality services.

Currently, there is a significant disparity in funding opportunities between established and grassroots organizations. Federal dollars intended to serve trafficking survivors are historically allocated to established, non-trafficking specific organizations who have previously received federal or state funding, giving them an advantage in the grant process. Meanwhile, grassroots programs exclusive to human trafficking are forced to rely on private funding, limiting their ability to expand services. When domestic violence shelters, homeless shelters, and youth homes receive human trafficking funding from federal agencies, they are viewed as the "top human trafficking programs", regardless of whether they have effective human trafficking programming. In fact, the long-term effectiveness of human trafficking programs are rarely evaluated. As a result, law enforcement, state child protective agencies, and other referring organizations default to these general programs for victim placement because they trust the government has done its due diligence before funding the program. Currently there is no mechanism to ensure that programs funded by the Government are providing effective, victim-centered, trauma-informed care based on industry best practices. Decisions are based on an organization's ability to effectively write grant proposals which, while an important skill, is not indicative of quality care. When federal funding is given to programs which are ill equipped to properly address trauma and provide survivors the support they need, it results in re-victimization.

Furthermore, funding organizations who lack a strong human trafficking program is a misuse and poor allocation of the limited monies allocated to protect victims of trafficking. Currently the federal dollars spent to combat trafficking are systematically failing to provide adequate protection for survivors. Protection is not defined by a warm bed, a hot meal, or a hotel voucher. Protection is provision of quality specialized services that human trafficking survivors require to help them overcome the complex trauma that they have endured. There is a lack of oversight for programs claiming to serve trafficking survivors, which allows these organizations to pocket millions of dollars in federal funding while refusing services to survivors, providing limited or improper services, or operating their program with limited business hours, which leaves those in need of services left without access at night, on weekends, and during holidays.

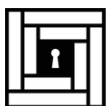
There is a need to create a more equitable grant review process that gives priority funding to programs who have undergone a comprehensive third party evaluation of their human trafficking program to serve survivors at the highest levels of care. Third party evaluation and certification is essential to enforce best practices to determine the efficacy of an organization's human trafficking programming. Without requirement of a third party evaluation for programs receiving federal funding, survivors seeking restorative care are placed into unvetted programs that lack standards of care for trafficking victims, which can result in revictimization, loss of trust from the survivor, and ineffective allocation of government resources.



**Recommendation:** The Government should adopt a requirement that trafficking programs be evaluated using a third-party, independent evaluator to ensure practical application of their restorative care programming, compliance, financial sustainability, governance, specialized services, and overall effectiveness is victim-centered, trauma-informed and based on industry best practices. In order to be eligible for federal funding, organizations must receive certification which will lead to better protection of victims and more equitable distribution of Government funding.

**Please provide additional information and/or recommendations to improve the government's anti-trafficking efforts overall.**

The United States Government has allocated a nominal amount of funding to human trafficking with a threefold focus on the prevention, prosecution, and protection of survivors of trafficking. Despite hundreds of millions of dollars being allocated to this issue, there has been little progress at the victim level. In 2016, there were 7,742 human trafficking cases reported to the National Human Trafficking Hotline and in 2020, that number rose to 10,583 human trafficking cases, despite practitioners affirming this remains only a small fraction of those actually being trafficked within the United States. Victim identification continues to remain low because the educational resources deployed are not industry specific; failing to effectively train frontline professionals on what signs and indicators they might encounter in their work environment. According to the Bureau of Justice Statistics, the number of arrests reported for commercial sex trafficking were 684 in 2015, but had dropped to a mere 301 in 2020. That means that less than 2.8% of reported cases are leading to arrests. Prosecution rates are low in part due to COVID, but more importantly, because we are failing to properly equip those that have an opportunity to observe, report, and intervene.



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**Recommendation:** The Government should establish a more comprehensive roadmap for the development and sustainability of collaborative model task forces, allowing law enforcement to work alongside victim service providers from certified programs who can effectively and appropriately support survivors. If survivors feel safe and secure, they will be empowered to participate in the criminal justice process, leading to an increase in the prosecution rate of traffickers. Law enforcement should also adopt a victim-centered approach through training, policy, and practice to help them establish a strong rapport with victims they intersect and ensure they do not further victimize or exploit the individual.

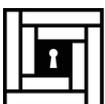
**Recommendation:** Educational materials distributed and endorsed by the government must be survivor informed and relate trafficking signs and indicators present to the environment of the professional being trained.

**Recommendation:** All healthcare workers, educators, military personnel, and government employees (local, state, and federal) should be required to take an industry-specific human trafficking training. This training should focus on domestic trafficking and its intersection points with vulnerable populations, including relevant signs and indicators, as well as instruction on proper response to a suspected incident.

**Recommendation:** Government should establish methods to diversify awarding of federal grant dollars to ensure an equitable distribution of funding to effective programs in the interest of creating a comprehensive solution for victim services. The continuum of care must be accessible to all populations in every state. Comprehensive wraparound services should be available to all survivors, including but limited to programs for males, survivors with children, assistance for severe mental health challenges, etc.

**Recommendation:** Residential programs should undergo certification to signal to law enforcement, child protective agencies, and other referring organizations that they have effective restorative programming for human trafficking victims.

"In 2016, there were 7,742 human trafficking cases reported to the National Human Trafficking Hotline and in 2020, that number rose to 10,583 human trafficking cases, despite practitioners affirming this remains only a small fraction of those actually being trafficked within the United States."



# PROSECUTION

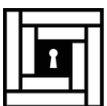
**Please provide observations regarding the implementation of existing laws, policies, and procedures. Are there gaps in anti-trafficking legislation that could be amended to improve the government's response? Are there any government policies that have undermined or otherwise negatively affected anti-trafficking efforts within that country?**

Within the field, there has been much discussion regarding the decriminalization of prostitution as a legislative fix to victims of human trafficking being inappropriately labeled as criminals and charged with criminal offenses. While this would help in addressing that concern, legislation must also increase penalties for the buyers of commercial sex and advocate for similar policies to be adopted at the state and local levels as well.

The federal government allocates less than \$100 million annually to support anti-human trafficking programs in the United States. The overwhelming majority of that funding is focused on victim services.

This leaves very little funding for the development and implementation of innovative tools to address human trafficking, such as leveraging certain technologies to aid law enforcement in identifying victims and building cases for prosecution that are not dependent on victim testimony - despite continuous calls for investigations to not be built around victim testimony. The government must take a serious look at its funding priorities as it pertains to human trafficking and overhaul the current grant programs that were created more than 20 years ago to ensure that programs are designed in a way that best meets the needs of frontline professionals and survivors of human trafficking.

**Recommendation:** Congress should establish a Human Trafficking Commission comprised of survivor-leaders, subject matter experts, and government agency stakeholders to conduct a thorough review of current laws, including grant programs, and provide ongoing recommendations to ensure that legislatively established programs are being implemented on best practices and programs being used by and receiving funding from the government are effective and appropriate.

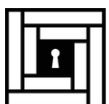


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**Do government officials understand the nature of all forms of trafficking? If not, please provide examples of misconceptions or misunderstandings. Did the government effectively provide or support anti-trafficking trainings for officials? If not, how could they be improved?**

The federal government remains disjointed in its approach to addressing human trafficking and lacks a comprehensive training for government officials that provides insight to all forms of trafficking. Furthermore, there is an extreme deficit in training for law enforcement and prosecutors. There remain notable instances of law enforcement and prosecutors failing to properly identify a victim of trafficking or denying prosecution of an alleged trafficker because they did not understand the elements of the crime. Human trafficking is not broadly accepted as a relevant crime, nor is it broadly understood. Many misconceptions, particularly around the elements of force, fraud, and coercion, are prevalent among prosecutors and investigators. There is also a lack of knowledge surrounding, or unwillingness to deploy, innovative techniques to investigations and prosecutions that leverages the use of technology and evidence other than victim testimony.

**Recommendation:** The government, in consultation with survivor-leaders, subject matter experts, and other relevant stakeholders, should establish a set of training standards for prosecutors and law enforcement and make available, through grant funding, training on advanced and innovative techniques to investigating and prosecuting cases of human trafficking. This would include mandating a more comprehensive human trafficking identification and response training for Federal Law Enforcement Training Center which includes an advanced investigations component for investigators.



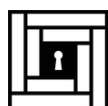
**Please provide observations on overall anti-trafficking law enforcement efforts and the efforts of police and prosecutors to pursue trafficking cases. Is the government equally vigorous in pursuing forced labor and sex trafficking, internal and transnational trafficking, and crimes that involve its own nationals or foreign citizens? Was the law equitably enforced, or were certain communities disproportionately affected? If not, why?**

Within the United States there remains a lack of political will to properly allocate resources to enforcement of existing laws, policies, and procedures. Despite the availability of federal funding for human trafficking task forces, many local and state law enforcement agencies have failed to implement effective training, establish specialized units, or even adopt standard operating procedures pertaining to response to suspected cases of human trafficking. Simply put, the interdiction of human trafficking is not a priority for America's law enforcement.

Additionally, federal investigators focus the overwhelming majority of their resources on child sex trafficking. Although certainly a vulnerable population worthy of interdiction, there are many young adults who are being victimized that are simply ignored and left within their cycle of victimization. This also applies to the allocation of resources to investigate and interdict labor trafficking. While many states have yet to pass strong anti-labor trafficking laws, the federal government does have those laws enacted. The problem is that they do not have the training, time, or focus to effectively interdict these situations. There also exists misconceptions that labor trafficking is simply a byproduct of illegal immigration.



**Recommendation:** The Executive should establish a Counter-Human Trafficking Office within the EOP to coordinate government response and set priorities for resource allocation and agency response. The Director of the Counter-Human Trafficking Office would oversee the implementation of the National Action Plan to Combat Human Trafficking, convene stakeholders to continue to inform government action, and provide recommendations to improve efforts.





## **Do judges appear appropriately knowledgeable and sensitized to trafficking cases? Do they implement and encourage trauma-informed practices in their courts?**

Unfortunately, members of the judiciary still lack adequate training to truly understand the complexities of, and trauma associated with, human trafficking. There are instances of federal judges sentencing below mandatory minimums or dismissing the impact of trafficking on victims - while on the record. This creates many problems from a rule of law perspective, but also the trauma it can inflict on victims when judges discredit their victimization.

**Recommendation:** The Judicial Branch should consult with survivor-leaders, subject matter experts, and relevant stakeholders to enhance the availability of training and other communications products to ensure that members of the judiciary are educated on the complexities of human trafficking, as well as the collective efforts to address the issue from law enforcement, policy makers, and NGOs.



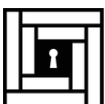
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# PROTECTION

**What victim services are available and provided (legal, medical, food, shelter, interpretation, mental health care, employment, training, etc.)? Who provides these services? If NGOs provide the services, does the government adequately support their work either financially or otherwise? Did all victims and survivors of both labor and sex trafficking—regardless of citizenship, gender identity, racial/ethnic identity, sexual orientation, religious affiliation, and physical ability—receive the same quality and level of access to services?**

Government support of NGOs in their efforts to provide victim services is inequitable. Programs offering victim services are insufficiently vetted prior to disbursement of funds, and funds allocated do not adequately meet the needs of all demographics of survivors. Oftentimes, federal funding goes to organizations that have the money to hire expensive grant writers, but don't necessarily have the best programs. In addition to the inequity of funds allocated, the accessibility of appropriate and effective care is also an obstacle faced by survivors. Lack of access is often based on several factors:

1. **Geographic Location** - Federally funded programs are often located in largely populated areas, in cities and states with higher identification rates, leaving survivors in rural areas without access to care.
2. **Gender** - The majority of beds available in restorative care are available to cisgender females, leaving cisgender males and transgender individuals without access to care.
3. **Mother/Child** - Without restorative care homes available that can accommodate children, mothers remain in their trafficking situation and/or without restorative care for fear of losing their children to the system or their trafficker. There are currently only a handful of restorative care programs licensed and able to accommodate parenting survivors. These homes require vastly more funding to provide support to both mother and children which deters many developing programs from serving this demographic of survivors. Many survivors with children are not able to utilize the small number of restorative care homes that are available to them due to custody guidelines that do not allow their children to leave the state.
4. **Physical Disabilities** - For survivors with physical disabilities, there are very few programs across the country that can accommodate. If those programs do not have availability, survivors receive inadequate services or no services at all.
5. **Mental Health** - Survivors with severe mental health disorders, including schizophrenia, Dissociative Identity Disorder, Borderline Personality Disorder are denied access to programs due to a lack of care options or partnerships in place for those with severe mental health challenges.
6. **Addiction Level** - Survivors with severe, active addictions are often unable to find placement in restorative care due to an organization's inability to facilitate medical detox. The vast majority of programs available to survivors require incoming clients to have a minimum of 30 days of sobriety before entering. Facilities for medical detox that accept medicaid or offer free services are few and vary by state.



**Recommendation:** Adopt certification standards based on industry best practices which are implemented by a third party provider to improve quality of programming, create consistency across programs throughout the United States, and produce equitable care for all demographics of survivors.

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**Recommendation:** As part of federal funding consideration, inclusivity through cultural relevance should be incentivized. For example, program staff demographics (such as race, ethnicity, gender identity, and religious background) that are similar to the diversity profile of the participants.

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**What was the overall quality of victim care? How could victim services be improved? Are services victim-centered and trauma-informed? Were benefits linked to whether a victim assisted law enforcement or participated in a trial, or whether a trafficker was convicted? Could victims choose independently whether to enter a shelter, and could they leave at will if residing in a shelter? Could adult victims leave shelter premises unchaperoned? Could victims seek employment and work while receiving assistance?**

The overall quality of victim care is difficult to ascertain due to the lack of universally accepted standards. This leads to the inability to vet each program individually.

Due to the fact that the government does not recognize any independent certifying body that has standardized approaches to restorative care, the current quality of programming runs the gambit between horrific and innovative and every place in between. High quality programs should be victim-centered and trauma-informed. However, there is little ability to distinguish these from sub-standard services. Only after a survivor has been mistreated, re-victimized, or abused do these practices come to light.

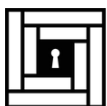


Another challenge to availability of appropriate care is the integration with the criminal justice process. While almost all providers state that services are available to victims regardless of engagement with law enforcement, many are not willing to accept clients that may need to travel, especially across state lines, to participate in a criminal trial. This unnecessarily causes survivors, who should be focusing on their healing, to be forced to make an unfair decision - get the healing they need or ensure their trafficker is held accountable and prevented from victimizing anyone else. Some programs even actively discourage their participants from cooperating with law enforcement. Not only can this frustrate the survivor and hinder their ability to seek justice, but it also frustrates law enforcement and can effectively discourage them from allocating resources to the investigation and interdiction of trafficking enterprises.

With a few minor exceptions, adult victims, as well as many youth in state care, are given the autonomy to decide whether they will enter a shelter or restorative care program. However, there is not a standardization of practice when it comes to program participants being able to leave unchaperoned. This creates confusion for those running aftercare programs as well as the survivors who are participating in them. This is why industry standards need to be adopted and backed by the government. A uniform approach better manages expectations. Additionally, the healing process could be stunted, particularly when it comes to seeking employment. Reintegration into the community and self-sufficiency are vital. The approach to both is not consistent or universal.

Victim services could be improved by identifying a third party certifying body to ensure all programs are victim-centered, trauma-informed, and equitable.

**Recommendation:** The Government should adopt a requirement that trafficking programs be evaluated by a third-party, independent evaluator to ensure practical application of their restorative care programming, compliance, sustainability, governance, and overall effectiveness is victim-centered, trauma-informed and based on industry best practices. In order to be eligible for federal funding, organizations must receive certification which will lead to better protection of survivors.



**How did the government encourage victims to assist in the investigation and prosecution of trafficking? How did the government protect victims during the trial process? If a victim was a witness in a court case, was the victim permitted to obtain employment, move freely about the country, or leave the country pending trial proceedings? How did the government work to ensure victims were not re-traumatized during participation in trial proceedings? Could victims provide testimony via video or written statements? Were victims' identities kept confidential as part of such proceedings? In what ways could the government support increased participation of victims in prosecutions against their traffickers?**

There remains a lack of sensitivity and understanding regarding the impact of trauma and victimization on survivors of human trafficking throughout the criminal justice process. A “victim-centered” approach demands that the needs of the survivor be placed in front of the needs of the investigative process. This approach is frustrated by the lack of assurances that a care facility is appropriate for the survivor. Law enforcement agencies don’t know where to place survivors to receive quality care and lack the ability to work collaboratively with these programs. When a survivor is provided with proper support and care, they are able to participate more meaningfully in the criminal justice process. They are also able to advocate-for-self and receive the support to understand what legal options are available to them.

**Recommendation:** Survivor care programs need to undergo certification through a federally recognized third party NGO to signal to law enforcement, child protective agencies, and other referring agencies that they have effective human trafficking programming.



# PREVENTION

**What efforts has the government made to prevent human trafficking? Did the government enforce any policies that further marginalized communities already overrepresented among trafficking victims, increasing their risk to human trafficking? If so, did it take efforts to address those policies?**

The United States continues to fail to prioritize efforts to prevent human trafficking. Despite prevention being a part of the 3-pronged approach established more than 20 years ago with the passage of the Trafficking Victims Protection Act (2000), there remains a lack of funding for these programs, as well as promotion regarding the need for prevention. Prevention is effective, but to truly be effective it must receive equal attention as the other 2 “P’s”.

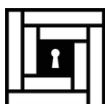
**Recommendation:** The Congress should appropriate the monies called for in the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018 to fund prevention programming.

**Recommendation:** The Government should enhance efforts to spotlight effective prevention programs and communicate the importance of these programs as part of a comprehensive strategy to combat human trafficking.

**If the government had a national action plan to address trafficking, how was it implemented in practice? Were NGOs and other relevant civil society stakeholders consulted in the development and implementation of the plan?**

The United States released their first-ever National Action Plan to Combat Human Trafficking in 2020. This comprehensive plan engaged both governmental and non-governmental stakeholders in the development of priorities and specific actions which needed to be taken to address human trafficking domestically and abroad. While the plan is comprehensive, its implementation has been stifled by a lack of focus on the issue of human trafficking by leadership, as well as the lack of a designated coordinator to oversee its implementation, convene stakeholders, and align agencies across the federal government.

**Recommendation:** The Executive should establish a Counter-Human Trafficking Office within the EOP to coordinate a whole of government response, and set priorities for resource allocation and agency response. The Director of the Counter-Human Trafficking Office would oversee the implementation of the National Action Plan to Combat Human Trafficking, convene stakeholders to continue to inform government action, and provide recommendations to improve efforts.



# GLOSSARY OF TERMS

**Boyfriending:** A grooming process by which an individual, usually a female, enters into a romantic relationship with a male that escalates from mutual caring for one another to the male controlling and manipulating the female into thinking that she owes him something.

**Child Sex Trafficking:** When the victim is less than 18 years old, the presence of a commercial sex act is considered trafficking, with or without force, fraud, or coercion.

**Commercial Sexual Exploitation of Children (CSEC):** Exploiting a minor for sex acts with a commercial element, which includes child sex trafficking and child pornography. Also known as commercially sexually exploited youth (CSEY).

**Complex PTSD:** Response to chronic traumatization over the course of months or, more often, years. Can include emotional, physical, and/or sexual abuses, domestic violence, living in a war zone, being held captive, human trafficking, and other organized rings of abuse.

**Dissociation:** Mental disorder that involves experiencing a disconnection and lack of continuity between thoughts, memories, surroundings, actions, and identity. People with dissociative disorders escape reality in ways that are involuntarily and unhealthy and cause problems with functioning in everyday life.

**Domestic Minor Sex Trafficking:** The sexual exploitation of minors within the United States.

**Exploit:** Traffickers abuse others' vulnerabilities for profit gained from forced labor and commercial sex.

**Familial Trafficking:** The commercial sexual exploitation of an individual by a family member through force, fraud, or coercion, or when the victim is a minor.

**Grooming:** The process of someone building a relationship, trust, and emotional connection with an individual so they can manipulate, exploit, and abuse them for a sexual offense.

**Human Smuggling:** Forcibly and illegally moving someone across an international border.

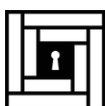
**Human Trafficking:** The act of recruiting, harboring, transporting, providing, or obtaining a person for labor, services, or commercial sex acts by means of force, fraud, or coercion for the purpose of exploitation, involuntary servitude, peonage, debt bondage, slavery, or any commercial sex act involving a minor. The federal definition of human trafficking in the US doesn't require travel, transportation, or movement to be a component.

**Safe House:** A safe place aiding in helping sex trafficking victims through education, development, medical attention, detox and rehab, branding removal, legal counseling, and therapy.

**Sex Trafficking:** The commercial sexual exploitation of an individual through force, fraud, or coercion or a commercial sex act when the victim is under the age of 18.

**Survivor Identification:** Recognizing common signs and indicators of sex trafficking in order to identify those being trafficked.

**Trauma Bonding:** Caused by periods of intense love and excitement with a person followed by periods of abuse, neglect, and mistreatment.





# SAFE HOUSE PROJECT

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