



# Addressing Vulnerabilities to Labor and Sex Trafficking

A Supplementary Brief to *A Presidential Agenda for Ending Modern Slavery and Human Trafficking* | 2021-2024

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## **About the Alliance to End Slavery and Trafficking (ATEST)**

The Alliance to End Slavery and Trafficking (ATEST) is a U.S.-based coalition that advocates for solutions to prevent and end all forms of human trafficking and forced labor around the world. We promote lasting solutions to prevent forced labor and sex trafficking, hold perpetrators accountable, ensure justice for victims and empower survivors with tools for recovery. Our collective experience implementing programs at home and abroad gives us an unparalleled breadth and depth of expertise.

As ATEST, we are social workers, counselors, lawyers, doctors, workers' rights activists, children and youth advocates, researchers, immigrant rights protectors, human rights defenders and others. We believe in a holistic, comprehensive approach to anti-trafficking work, striving to address the needs and vulnerabilities of communities particularly at risk, including immigrants, migrant workers and refugees, LGBTQ+, children, runaway and homeless youth, communities of color, and ethnic and religious minorities. We are committed to focusing on racial and gender equity throughout our work. We promote victims' rights and access to justice and remedy, and the decriminalization of coerced and forced conduct. We insist on the separation of labor law and immigration enforcement. We take a victim-centered, trauma-informed, and worker-experience approach and center our work in a human, civil, and worker rights framework. We advocate for inclusion of survivor voices in the shaping of anti-trafficking policies and programs. We believe in consensus building, collaboration, and partnerships to support bi-partisan solutions that address the root causes of trafficking and the vulnerabilities of the populations for whom we advocate. We promote inclusive growth and sustainable development in our anti-trafficking programming and advocacy, focused on concrete actions, long-term solutions, and measurable impact.

Since its inception, ATEST has focused equally on both labor and sex trafficking. In recent years, we have witnessed back sliding and misinformation about the scope and extent of human trafficking, with much less attention given to forced labor, and false information about the scope and underlying root causes of trafficking for sexual exploitation. We urge the new administration to engage in an awareness raising information campaign and implement meaningful policies to dispel the harm caused by this unbalanced and unsubstantiated approach.

ATEST member organizations include: Coalition to Abolish Slavery & Trafficking (CAST), Coalition of Immokalee Workers (CIW), Free the Slaves, HEAL Trafficking, Human Trafficking Institute, Humanity United Action (HUA), McCain Institute for International Leadership, National Network for Youth (NN4Y), Polaris, Safe Horizon, Solidarity Center, T'ruah: The Rabbinic Call for Human Rights, United Way Worldwide, Verité and Vital Voices Global Partnership.

## INTRODUCTION

Successful anti-trafficking efforts require a serious expansion of resources for victims and survivors to ensure they are able to access safe housing, treatment, medical care, legal services and exploitation-free jobs. Funding for victim services has not been sufficient to meet the ever-growing needs of survivors, especially with increased needs during the COVID-19 crisis. Big, bold investments of resources in prevention efforts that address trafficking from a human rights-based approach is the only path forward. Rather than continuing to address trafficking through disconnected programs scattered across various agencies, we propose a whole-of-government approach focused on preventing people from ever becoming trafficked.

Over the past 20 years, the United States has focused its C-TIP efforts on criminal enforcement. The *Trafficking Victims Protection Act* (TVPA) outlined three important goals for the C-TIP movement: prosecution of traffickers so they cannot harm again, protection of victims through services to increase safety and treat trauma, and prevention efforts to alleviate social vulnerabilities to exploitation. The time is now to focus our commitment on prevention and protection efforts.

ATEST calls for survivor-oriented, trauma-informed services and law enforcement actions in the United States; new approaches to address criminal records issues, including through legislation that vacates prior convictions of survivors; and urgent fixes to procedures for immigration relief. We call for enhanced victim services for vulnerable populations, including children and Runaway and Homeless Youth; expanded housing and employment and training resources for all survivors; and strengthened worker protections, particularly in the guestworker programs and for domestic workers, including greater regulation for the role that foreign labor recruiters play in increasing the vulnerability of migrant and immigrant workers to trafficking in persons.

# PRIORITY ISSUES

## 1. Research

### Highly vulnerable population study

Because homeless and human trafficked youth are often indiscernible and unwilling to disclose their housing and victimization status, a new national multi-tiered research and data collection effort is needed. To identify, scale and improve access to the most effective interventions, including housing and services for vulnerable homeless and human trafficked youth, regular large-scale research is needed to gather data and information on the number, characteristics, and needs of unaccompanied homeless youth in the United States. To prioritize the improvement of data collection and C-TIP interventions, HHS should:

- Request funding for a new study on the prevalence, characteristics, and needs of programs serving homeless youth in America; and
- Use the results of this study to inform future interventions for homeless youth.

### National prevalence study

Following completion of the highly vulnerable population study, the Department of Justice National Institute of Justice (DOJ/NIJ) should submit the report to Congress on their efforts to develop a methodology to assess the prevalence of human trafficking in the United States, including a timeline for completion of the methodology pursuant to Section 401 of the *Trafficking Victims Protection Act of 2017* (P.L. 115-393). This data will be critical in determining and targeting the right services in the right geographies, as detailed throughout the rest of this brief. To meet this requirement, DOJ should:

- Submit this required report to Congress with a recommended methodology and advocate for funding of a U.S. prevalence study, or more accurately, a series of prevalence studies focused on specific geographies, economic sectors and forms of trafficking in the United States. For the past several years, the global anti-trafficking learning community (notably led by civil society organizations and academics) has come to realize that the value of prevalence studies lies in the ability of policymakers and researchers to correlate changes in prevalence with changes in policies and interventions; this is only possible through more granular study that allows for distinct methodologies to be used to assess different forms of human trafficking among distinct communities. DOJ/NIJ should ensure opportunities for consultation with experts and comments on the final recommendations as part of this transparent process. It is important to note that we recommend first completing the vulnerable populations study as recommended in the HHS section to help inform this study.

## **2. Emphasis on Prevention**

The United States has not fully prioritized prevention efforts in its counter-trafficking in persons (C-TIP) response. Efforts to combat trafficking cannot be comprehensive without an emphasis on prevention programs that create social conditions that prevent people from ever being trafficked or exploited. A prioritization of this goal will require a whole-of-government response and interagency cooperation to ensure no vulnerable person is left behind. Funding and emphasis should be directed towards programs in the Departments of Labor (DOL) and Health and Human Services (HHS) that require more funding to fully implement their programs and meet growing needs. In addition, programs at the Departments of Education (ED) and Housing and Urban Development (HUD) are essential to prevention efforts.

### **Recommendations**

- Department of Health and Human Services
  - Secure additional funding for victim services and prevention
    - Increase services to meet expanded needs for all victims of trafficking during the COVID-19 crisis;
    - Commit additional resources to prevention programs to combat the heightened vulnerabilities to exploitation from the COVID-19 crisis;
    - Expand funding for outreach and training programs that take a public health approach to combating trafficking and forced labor. Outreach and training programs should not be funded by resources dedicated to victims services, but should be supported with additional funding;
    - Provide sufficient funds for a per capita program to fund services for foreign national victims for up to two years with flexibility to extend beyond 2 years if needed given extended T visa processing times and COVID-19 related impacts;
    - Eliminate the match requirement for U.S. citizen victim grant programs;
    - Remove the policy barring organizations from receiving HHS per capita funding if they already receive DOJ grant funding if they can show need in their areas;
    - Follow the U.S. Advisory Council on Human Trafficking’s recommendation to create a “victim ID card” to remove a major hurdle to victims accessing social services before they are able to obtain a form legal ID; and
    - Consult with the U.S. Advisory Council on Human Trafficking and other survivor consultants in the creation of all new programs and program evaluation and compensate them appropriately.

- Department of Labor
  - Strengthen regulation of foreign labor recruiters (U.S. and abroad)
    - Require that all foreign labor recruiters be registered and licensed to engage in recruitment of overseas workers;
    - Require employers to pay all recruitment-related costs across all visa categories and implement policies where the burden is on the employer to proactively document to DOL that any foreign labor recruiter they utilize is not charging workers fees;
    - Create a system where workers can, without fear of retribution, easily report in their own language, through a third party translator, if they are charged unlawful fees, and receive publicly available information about employers and recruiters with a history of charging illegal recruitment fees;
    - Issue guidance clarifying that the *Fair Labor Standards Act* (FLSA) requires all recruitment fees across all visa categories to be repaid in the first workweek to the extent necessary to bring wages up to the minimum. These repayments cannot take the form of loans to workers. Also, ensure workers know their rights by providing educational materials and pamphlets at the recruiter’s office, during the visa application process, etc.;
    - Issue a memo to all Wage and Hour (DOL/WHD) field offices reminding them of the agency’s authority to enforce the FLSA with regard to any FLSA-covered worker, regardless of visa category, even when there is no specific regulatory authority with respect to specific visa program rules; and
    - This Administration should implement a policy across agencies that regardless of recruitment fees paid or reporting of illegal recruitment practices, workers will not be denied visas or otherwise “blacklisted” for reporting illegal or harmful employer practices.
  - Employment and Training Administration (DOL/ETA)
    - Use discretionary funds under the Workforce Innovation Opportunity Act (WIOA) to fund trafficking in persons (TIP) specific employment programs in the Public Workforce system;
    - Deliver annual webinars to that system to raise awareness of TIP issues and how to provide services in a trauma-informed manner to survivors;
    - Update guidance for employment programs on specific needs for employed survivors during the COVID-19 pandemic; and
    - Update and enhance the Training and Employment Guidance Letter (TEGL) on trafficking, in order to reflect learning from the various pilot initiatives. This update should be undertaken in consultation with anti-trafficking organizations and the U.S. Advisory Council on Human Trafficking;

- Department of Education
  - Training for educators
    - Develop materials regarding all forms of human trafficking, including sex and labor trafficking, to ensure that educators and students are aware of how to identify, report and treat all types of trafficking and understand the dynamics of how children can be recruited into sex and labor trafficking;
    - Publish a white paper on all forms of trafficking among student populations and effective means of identifying cases of trafficking;
    - Create a model curriculum for educators on identifying and reporting possible trafficking cases;
    - Adapt existing and new materials to challenges faced in identification of trafficking during the COVID-19 pandemic; and
    - Consult stakeholders—including educators, non-governmental organizations (NGOs), both labor and sex trafficking survivors, and the U.S. Advisory Council on Human Trafficking—on the development of materials, the white paper, and the model curriculum;
  - Improve education support for students experiencing homelessness
    - Increase monitoring of the McKinney-Vento Education for Homeless Children and Youth program to ensure that all State Education Agencies and Local Education Agencies are fully implementing the law;
    - Develop plans to integrate students who have been identified as being trafficked within communities into an appropriate learning environment after their trafficking experience; and
    - Update and reissue the guidance letter regarding implementing the policy that unaccompanied homeless youth are not required to provide parental tax return information in order to complete the Free Application for Federal Student Aid (FAFSA);
- Department of Housing and Urban Development
  - Housing assistance programs for survivors
    - Ensure that trafficking programs continue to qualify for Domestic Violence bonus funds;
    - Prioritize youth-appropriate housing interventions and models in Homeless Assistance Grants (HAG) to Continuums of Care (CoC) to ensure youth are not placed in inappropriate housing facilities;
    - Provide stronger and more direct guidance on resource eligibility for trafficking victims;
    - Supply guidance for HUD providers on signs of human trafficking and proper reporting channels; encourage the CoCs to work with service providers and survivor leaders to develop this guidance;

- Require CoCs to use coordinated entry assessments and tools that prioritize children, youth, young adults, and survivors of human trafficking;
- Require more effective questions on intake forms to more effectively determine if someone is a victim of human trafficking and ensure these data points are added to HUD's Homeless Management Information System (HMIS);
- Consult with the U.S. Advisory Council on Human Trafficking and partner with the Family and Youth Services Bureau to design and pilot a model online training program for homeless service providers on all forms of trafficking and make it required training for any provider receiving federal HUD funding; and
- As recommended in the U.S. Advisory Council's 2020 report, *promote housing services for whole families. Often survivors, due to criminal records or lack of resources, find themselves living in the same communities and environments where their traffickers may have easy access to them and their families. Housing initiatives that support survivors and their families should include opportunities for families to leave areas and communities in which they continue to be vulnerable.*<sup>i</sup>

### **3. Decreasing Workers' Vulnerabilities to Exploitation**

The C-TIP efforts from the U.S. Government require more investment in workers' rights to prevent workers from becoming vulnerable to exploitation. This will require interagency cooperation to ensure the Department of Labor is able to identify areas of worker vulnerability or possible violations of workers' rights. The Department of Justice should create mechanisms so workers can seek redress through the U.S. justice system for workplace abuses without threats of retaliation from employers. To increase the U.S. efforts to prevent worker vulnerabilities, ATEST recommends the following:

#### **Recommendations**

- White House
  - Create a **Presidential Initiative on Decent Work and Inclusive Growth** within the Executive Office of the President that creates a comprehensive whole-of-government approach that prioritizes the creation of quality jobs, worker rights and strong social protections for workers in the formal and informal economy. Such an initiative should include a focus on all workers in the United States, including immigrant or migrant workers. As workers' rights protections are critical for trafficking prevention, such an initiative would provide a coherent and comprehensive approach to reducing the prevalence of forced labor and



human trafficking in the United States. To lead the Presidential Initiative, ATEST urges the Administration to:

- Establish a position at the National Security Council (NSC) to coordinate global economic and development policies and programs that advance the objectives of the decent work and inclusive growth agenda to further the goals related to trade and forced labor prevention in supply chains outlined elsewhere in this report; and
- Establish an NSC-led interagency group on corporate accountability that prioritizes effective implementation of international labor standards in business practices;
- Department of Justice
  - Create a mechanism for exploited or trafficked workers to access the U.S. judicial system and seek redress for workplace abuses, including non or underpayment of wages, damages sought for physical, sexual and/or psychological abuse, etc., and to allow workers to remain in the U.S. during the pendency of these ongoing investigations;
- Department of Labor
  - Wage and Hour Division (DOL/WHD) and Office of the Inspector General (DOL/OIG):
    - Request additional funding to increase the number of DOL/WHD and DOL/OIG inspectors nationwide;
    - Grant DOL authority to investigate potential human trafficking and labor exploitation claims without the requirement to coordinate with another law enforcement agency; and
    - Consult with the U.S. Advisory Council on Human Trafficking and community-based providers to develop and institute mandatory uniform training policies on forced labor for labor inspectors and other frontline DOL staff who may come into contact with human trafficking survivors nationwide.

#### **4. Significant Increase in Investment in Addressing the Root Causes of Trafficking**

Trafficking is preventable and to-date there has not been a significant investment in or coordinated multi-agency response to addressing the root causes of trafficking, this is especially the case during and in the aftermath of the pandemic. In fact, we expect higher rates of trafficking, as we've seen before in the aftermath of natural disasters like Hurricane Katrina and the 2010 earthquake in Haiti. There we saw increased forced labor in construction, and we can expect to see the same in other essential industries across the United States such as nursing, elder care and in our food supply chains.<sup>ii</sup> Further increased rates of unemployment and shelter-in-place orders cause trafficked victims to suffer abuse for longer considering they are now even more bound to their exploiters who commonly provide shelter and basic necessities.

## **Recommendations based on key areas ripe for trafficking abuse during the COVID-19 crisis**

- **Temporary Workers:** At this time, there are hundreds of thousands of immigrant workers on temporary work visas in the United States in industries as diverse as hospitality, agriculture, construction, landscaping, domestic servants, elder care, and nursing-related employment. These workers will travel, live, and work in close quarters and their visas are dependent on their employer. Given the pandemic, employers may have no work for these workers due to the closure of all but essential businesses in the United States or need to place increased pressures on workers who work in essential services supply chains. ATEST recommends:
  - Protect temporary workers displaced from employment by layoffs and early termination of work, and provide assistance for these workers who are unable to return to their home countries;
  - Protect workers who are working in essential industries including access to health care, protective gear, and knowledge on where to turn if they are being exploited or trafficked;
  - Increase resources for specialized services for human trafficking of immigrant workers; and
  - Pass legislation to provide increased protections for all temporary workers coming to the United States;
- **Homeless Youth and Adults:** Individuals experiencing homelessness are at high risk of infectious diseases, and their lack of shelter and movement to different places creates a higher risk for both contracting and spreading COVID-19. Additionally, increasing unemployment and the difficulty those experiencing homelessness face in accessing the systems of support provided during the crisis could mean they are even more vulnerable to be recruited into trafficking. This is especially the case for youth and young adults (YYA) experiencing homelessness and runaway youth, who are particularly vulnerable to trafficking for labor, commercial sexual exploitation, or both, and present unique challenges for service and engagement. An estimated 4.2 million young people (ages 13-25) experience homelessness annually.<sup>iii</sup> Research from numerous studies have found trafficking rates among YYA experiencing homelessness ranging from 19 percent to 40 percent.<sup>iv</sup> ATEST recommends:
  - Increase resources for specialized services for human trafficking as well as this vulnerable population; and
  - Increase outreach and prevention efforts around human trafficking after the shelter in place rules are lifted including a statewide hotline and technical assistance support as well as training and outreach for a wide range of first responders;
- **Victims of Domestic Violence and Sexual Assault Fleeing Violence:** The United Nations Secretary called for governments around the world to help address the “horrifying global surge in domestic violence” by making services for...survivors a

“key part of their national response plans for COVID-19.”<sup>v</sup> The National Domestic Violence Hotline has reported contacts from victims saying their abusers are using COVID-19 as a reason to further isolate them from their friends and family. Some abusers are withholding financial resources or medical aid. Victims also face potentially dangerous circumstances by staying home in order to avoid infecting others. Those fleeing domestic violence and sexual assault are commonly at greater risk for recruitment into sex and labor trafficking and the rise in resources needed for domestic violence and sexual assault also unfortunately signals the need for increased specialized resources for human trafficking. ATEST recommends:

- Increase resources for specialized services for human trafficking as well as this vulnerable population; and
- Increase resources for child protective services as reports of child abuse and human trafficking are expected to increase;
- Recently Unemployed: Recruitment into sex or labor trafficking to meet basic necessities or for access to shelter due to high unemployment rates around the country, could lead to an increase in trafficking.<sup>vi</sup> Additionally, trafficking both abroad and in the United States has been shown to increase in disaster areas or at times of crisis. For example, documented labor trafficking cases and abuse have occurred in the construction industry in Texas, Florida, and Louisiana after hurricanes and floods.<sup>vii</sup> Additionally, in Haiti and Indonesia, similar cases were documented, as well as domestic servitude cases.<sup>viii</sup> ATEST recommends:
  - Increase resources for specializes services for human trafficking.
  - Increase outreach and prevention efforts after the shelter in place rules are lifted including a statewide hotline and technical assistance support as well as training and outreach for a wide range of first responders.

### **Recommendations for funding and legislative priorities**

- Starting in the fiscal year (FY) 22 Budget request, the Administration should begin to systematically scale up investments to prevent and combat trafficking across the government, including
  - Significant increases in funding for the Runaway and Homeless Youth Act (RHYA) program, with a minimum investment of \$300 million. RHYA programs are embedded in local communities across the country and provide effective interventions that can actually prevent trafficking and other forms of exploitation. They can do this by reducing vulnerability, while also helping to identify at an early stage where these crimes are taking place and providing much-needed support, stabilization, and opportunities to young victims; and
  - Funding for research methodology (including the unfunded National Institute of Justice (DOJ/NIJ) national TIP prevalence study and the HHS vulnerable populations study);

- Prioritize passage of the Trafficking Victims Protection Reauthorization Act, set to expire September 30, 2021, included increased authorizations, particularly for prevention programs that lead to a measurable reduction in the prevalence of human trafficking victims;
- Prioritize support for the passage of the Runaway and Homeless Youth Trafficking Prevention Act (RHYTPA) (H.R. 5191/S.2916 in the 116th Congress);
- The passage of the Emergency Family Stabilization Act (EFSA) (H.R.7950/S.3923 in the 116th Congress) would fill an urgent gap in the nation's social safety net by allowing youth- and family-serving agencies to provide immediate support to homeless children, youth, and families—including those who are ineligible for HUD homeless assistance because they do not meet HUD's definition of homelessness. Providing housing-related and other services to children, youth, and families experiencing homelessness as early as possible prevents trafficking, supports survivors of trafficking, reduces transmission of COVID-19, and mitigates compounding trauma and negative lifelong impacts of homelessness; and
- Support legislation to reform the system of temporary visas to untie visas from employers, allowing workers to leave abusive and exploitative employers without fear of deportation. Data from the U.S. National Human Trafficking Hotline consistently shows that workers on temporary H-2A and H-2B visas are disproportionately represented amongst trafficking victims and survivors. Between 2015 and 2019, the Trafficking Hotline reported more than 3,600 survivors of human trafficking who were legally working in the United States. Approximately 87 percent of these individuals held H-2A and H-2B visas.[1] The Administration should prioritize working with Congress to ensure U.S. law no longer facilitates forced labor by untying temporary visas from sponsoring employers.

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## ENDNOTES

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<sup>i</sup> U.S. Advisory Council on Human Trafficking, *United States Advisory Council on Human Trafficking Annual Report 2020*, July 28, 2020, available at: <<https://www.state.gov/wp-content/uploads/2020/07/United-States-Advisory-Council-on-Human-Trafficking-2020-Annual-Report.pdf>>

<sup>ii</sup> Samantha Stout, "Human Trafficking in the Wake of Natural Disasters: is the United States Any Different Than Third World Countries?" (2018) available at: <<https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1028&context=acctuht>>

<sup>iii</sup> Morton, M.H., Dworsky, A., & Samuels, G.M., Missed opportunities: Youth

homelessness in America. National estimates (2017), available at: <<https://voicesofyouthcount.org/wp-content/uploads/2017/11/VoYC-National-Estimates-Brief-Chapin-Hall-2017.pdf>>

<sup>iv</sup> Lisa Pilnik, Responding to Youth Homelessness: a Key Strategy for Preventing Human Trafficking (2018), available at: <<https://nn4youth.org/wp-content/uploads/NN4Y-2018-white-paper-human-trafficking-FINAL-0918.pdf>>

<sup>v</sup> Melissa Godin, "As Cities Around the World Go on Lockdown, Victims of Domestic Violence Look for a Way Out," *TIME*, March 18, 2020, available at: <<https://time.com/5803887/coronavirus-domestic-violence-victims/>>

<sup>vi</sup> Heather Long, "Over 10 Million Americans Applied for Unemployment Benefits in March as Economy Collapsed," *The Washington Post*, April 2, 2020, available at: <<https://www.washingtonpost.com/business/2020/04/02/jobless-march-coronavirus/>>

<sup>vii</sup> See Greater New Orleans Human Trafficking Task Force, "Labor Trafficking," available at: <<http://www.nolatrafficking.org/labor-trafficking>>; and,

See Polaris, "Natural Disasters and the Increased Risk for Human Trafficking," September 1, 2017, available at: <<https://polarisproject.org/blog/2017/09/natural-disasters-and-the-increased-risk-for-human-trafficking/>>

<sup>viii</sup> Samantha Stout, "Human Trafficking in the Wake of Natural Disasters: is the United States Any Different Than Third World Countries?" (2018) available at: <<https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1028&context=acctuht>>