



Date: November 2024

To: White House Office of Management and Budget

Subject: FY26 recommendations for programs to end forced labor and human trafficking

CC: Transition team for the incoming presidential administration of Donald J. Trump

The year 2025, the first year of the incoming presidential administration of Donald J. Trump, marks a historic milestone in the ongoing fight to end one of the most important human rights challenges of our time. It's the 25th anniversary of the U.S. Trafficking Victims Protection Act¹. This landmark policy achievement, enacted in late 2000, forms the backbone of U.S. anti-trafficking efforts. It has equipped the U.S. government with a structure for collaborative interagency approaches and transnational action. The Trump administration will have an opportunity to commemorate this important anniversary by reaffirming America's commitment to ending forced labor and human trafficking through strategic investments in a whole-of-government approach.

Forced labor/human trafficking is a national security, global trade, economic growth, public health and criminal justice issue – as well as a violation of fundamental human rights. It is one of the fastest growing criminal industries in the world, affecting 28 million people². It is an illegal business practice that undercuts legitimate companies and incentivizes violent, exploitative labor practices. It is an unfair trade practice that threatens the stability of global commerce. Through the FY26 budget process, the Trump administration can strengthen America's leadership both at home and abroad by robustly resourcing efforts to prevent this crime, hold perpetrators accountable, and provide comprehensive services to those who are victimized.

Ending forced labor is both the right thing and the smart thing to do. It will not only benefit millions of individuals directly, but it will also benefit the economy as a whole. New research from the U.N. International Labor Organization (ILO) calculates that a fully-funded, concerted, worldwide effort to end forced labor can generate a threefold return on investment through increases in global GDP³. This return on investment is substantial because trafficking impacts an

¹ PL 106-386

² https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipecc/documents/publication/wcms_854733.pdf

³ <https://www.ilo.org/publications/major-publications/acting-against-forced-labour-assessment-investment-requirements-and>

individual victim’s life, health, housing stability, career trajectory and earning potential. The ILO research also indicates that current global spending to end forced labor is well below levels needed to accomplish the job.

The member organizations of the Alliance to End Slavery and Trafficking (ATEST) urge you to request funds in the President’s Fiscal Year 2026 (FY26) Budget in accordance with the package of laws passed by Congress to reauthorize the Trafficking Victims Protection Act⁴ and other relevant laws. This letter provides concrete recommendations from ATEST — a nonpartisan coalition of organizations working at the front lines in the United States and internationally — that articulate how the U.S. government can take a comprehensive, victim-centered approach. Not all federal anti-trafficking programs are mentioned below; we have focused on programs where the vast majority of U.S. spending is concentrated.

We understand the fiscal challenges our nation faces. However, we cannot lose sight of the human tragedies occurring every day within and beyond our borders.

SUMMARY

Department of Labor

- International Labor Affairs Bureau: \$213,000,000
- Employment and Training Administration: \$5,000,000
- Wage and Hour Division: \$350,000,000

Department of Health and Human Services

- Office on Trafficking in Persons Victim Services: \$260,000,000
- National Human Trafficking Hotline: \$8,500,000
- Runaway and Homeless Youth Act Programs: \$362,000,000
- Office of Refugee Resettlement: \$5,000,000
- Highly Vulnerable Populations Study: \$2,000,000

Department of Education

- Grants to Local Education Agencies: \$2,000,000
- Education for Homeless Children and Youth: \$300,000,000

Department of State

- Office to Monitor and Combat Trafficking in Persons: \$165,000,000
- Bureau for Democracy, Human Rights and Labor: \$25,000,000

⁴ P.L. 115-425, P.L. 115- 392, P.L. 115-393, P.L. 115-427, P.L. 117-347, P.L. 117-348

U.S. Agency for International Development

- Counter-Trafficking in Persons Program: \$22,000,000
- Global Labor Program: \$20,000,000
- Human Rights Grants Program: \$1,000,000

Department of Justice

- Office of Justice Programs: \$152,000,000
- Civil Rights Division Human Trafficking Prosecution Unit: \$8,000,000
- National Institute of Justice Prevalence Methodology Study: \$7,000,000
- Federal Bureau of Investigation: \$2,000,000

Department of Homeland Security

- Immigration and Customs Enforcement, Homeland Security Investigations, Center to Counter Human Trafficking & Customs and Border Protection: \$146,000,000
- Office of Victims Assistance: \$54,400,000
- Citizenship and Immigration Services: \$5,000,000

DETAILS

DEPARTMENT OF LABOR

International Labor Affairs Bureau: \$168,000,000

We request \$168,000,000 for the Bureau of International Labor Affairs (ILAB) in the Department of Labor (DOL). Specifically, we request \$27,000,000 for the administration of ILAB, \$70,000,000 for the Child Labor and Forced Labor program, \$48,000,000 for Workers' Rights Programs, and \$23,000,000 for program evaluation.

ILAB is an essential part of the U.S. government's international response to forced labor, human trafficking, and child labor. It is responsible for implementing Section 105(b)(2) of the TVPRA of 2005 (P.L.109-164) and Section 110 of the TVPRA of 2008 (P.L.110-457). Funding will allow ILAB to fulfill its Congressional mandates including: producing annual findings on worst forms of child labor in certain U.S. trade beneficiary countries; the development and maintenance of a list of goods prohibited from entering the U.S. marketplace because they are produced by child or forced labor, including inputs to goods made with child or forced labor; and increased responsibilities in enforcing the U.S. Mexico Canada Agreement (USMCA) negotiated during the first Trump administration. Adequate funding will ensure that staff is able to travel to the countries with which ILAB has partnered or where important research is needed to accurately maintain the list of goods made with forced labor or child labor. In addition, a robust and

expertly staffed entity within the U.S. government’s foreign policy establishment – that sits outside of the diplomatic constraints of the State Department and focuses particularly on worker rights – is tremendously important to the government’s ability to tackle human trafficking and address the underlying factors that place individuals at risk. ILAB provides valuable expertise through its participation on the interagency team enforcing the Uyghur Forced Labor Prevention Act (P.L. 117-78).

We request \$48,000,000 for Workers’ Rights Programs because they are essential to maintaining coherence with the U.S. trade agenda. ILAB provides technical assistance to countries on a variety of worker rights issues, many of which correspond directly to labor rights commitments under trade agreements. Project goals include adopting or reforming labor laws or standards, improving labor inspectorates’ enforcement capacity, increasing awareness of fundamental labor rights, and improving occupational safety and health conditions. ILAB provides technical advice and other support to labor ministries through workshops and exchange programs and hones in on areas of particular concern including the cocoa, cotton, fishing and cobalt sectors as well as other supply chains with heightened risks of child or forced labor.

ILAB assists U.S. businesses to comply with prohibitions on the importation of goods tainted by child or forced labor through the development and maintenance of online digital tools, Sweat & Toil and Comply Chain.

ILAB USMCA Supplemental Funding: \$45,000,000

In addition to the base funding for ILAB, we request \$45,000,000 in additional funding to Bureau of International Labor Affairs to allow it to continue Mexico-specific technical assistance in support of ongoing USMCA implementation by advancing labor protections, improving working conditions, stabilizing labor relations, and increasing public awareness and engagement. In addition, dedicated USMCA funding will enable ILAB to continue its work to strengthen government capacity in Mexico to address risks of child labor and forced labor.

Employment and Training Administration: \$5,000,000

The Department of Labor Employment and Training Administration (ETA) should conduct a review of all employment readiness, training, and other discretionary programs, and update program guidance as needed to explicitly include eligibility for trafficking victims where possible, per Sec. 107(b) of the Trafficking Victims Protection Act (P.L. 106-386). The requested funds should be used for grant programming to deliver trauma-informed employment and training services that address particular barriers to service, and challenges to finding employment, faced by survivors of human trafficking. The U.S Advisory Council on Human Trafficking has highlighted the acute need to provide access to employment and training programs to all survivors of human trafficking. Career development programs help survivors become self-sufficient and provide for their families. When survivors are employed, it positively affects their lives, prevents dependence on public benefits, and creates financial resilience that

reduces vulnerability to re-trafficking. We also recommend that the DOL integrate training to identify potential signs of trafficking and referral options as a regular activity for State Farmworker Monitor Advocates, and during the provision of relevant services to particular at-risk populations, including through the Youth Build, Job Corps and Reentry Employment Opportunity programs.

Labor trafficking affects both U.S. citizens and foreign nationals working across many industries, most commonly domestic work, agriculture, manufacturing, janitorial services, hotel services, construction, health and elder care, hair and nail salons, and strip club dancing. DOL needs resources to protect and support victims, particularly with much needed skills training and job placement services, as well as providing referrals to shelter, medical care, mental health services, legal services, and case management. ATEST member organizations have also worked with human trafficking survivors who were forced to engage in criminal acts, including forced activities related to gangs, weapons and narcotics. Victims impacted by this form of labor trafficking also require additional legal services in the realms of criminal law and immigration.

Wage and Hour Division: \$350,000,000

Among its many responsibilities, the Wage and Hour Division (WHD) enforces fundamental worker protections including minimum wage, overtime, child labor, recordkeeping, and anti-retaliation requirements under the Fair Labor Standards Act (FLSA); the wages and working conditions under the Migrant and Seasonal Agricultural Worker Protection Act (MSPA); and the enforcement of the labor standards under the Immigration and Nationality Act (INA) for certain temporary nonimmigrant workers. Robust and widespread enforcement of these laws are critical to protecting workers from exploitation and forced labor. Recent news reports highlight widespread child labor violations in U.S. factories.

Despite vast enforcement responsibilities, WHD is understaffed and vastly underfunded. Staffing declined by more than 7% between FY 2015 and FY 2021.⁵ In 2022, WHD had 810 investigators working to protect more than 165 million workers; in 1948, there were 1,000 investigators overseeing the protection of 22.6 million workers.⁶ The Department of Labor attests that “WHD is operating with one of the lowest investigator levels in the last fifty years...Continuing to operate at these levels poses significant risks to the mission — even for an agency whose strategic approach to enforcement recognizes the limitations of the agency’s size.”⁷ This is especially troubling over the past 10 years: As the number of H-2A and H-2B temporary visas

⁵ USDOL WHD, FY 2015 Congressional Budget Justification Wage and Hour Division at WHD-6, <https://www.dol.gov/sites/dolgov/files/legacy-files/documents/general/budget/2016/CBJ-2016-V2-09.pdf> (showing approved total WHD Full Time Equivalents (FTEs) of 1,727); USDOL WHD, FY 2022 Congressional Budget Justification Wage and Hour Division at WHD-6, <https://www.dol.gov/sites/dolgov/files/general/budget/2022/CBJ-2022-V2-09.pdf> (showing approved revised total WHD FTEs of 1,601).

⁶ Washington Center for Equitable Growth, Strategic Enforcement and Co-Enforcement of U.S. Labor Standards are Needed to Protect Workers Through The Coronavirus Recession at 1 (Jan. 14, 2021), <https://equitablegrowth.org/strategic-enforcementand-co-enforcement-of-u-s-labor-standards-are-needed-to-protect-workers-through-the-coronavirus-recession/>. This represents more than an 8-fold decrease in the number of investigators per worker since 1948.

⁷ USDOL, FY 2024 Budget in Brief, <https://www.dol.gov/sites/dolgov/files/general/budget/2024/FY2024BIB.pdf>.

issued by the State Department tripled, the number of WHD wage theft investigations has remained largely steady. By persistently underfunding WHD, the U.S. government enables widespread wage theft and other violations both in temporary visa programs and of U.S. workers. If the administration fails to fund WHD at levels sufficient to fulfill their mandate, America's workers will continue to be susceptible to wage theft, labor exploitation, and human trafficking.

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Administration for Children and Families (ACF), Victim Services, Office on Trafficking in Persons (OTIP): \$260,000,000

We request \$260,000,000 for OTIP to provide grants to non-governmental organizations that provide comprehensive, trauma-informed services to trafficking victims and survivors. The funds should be divided equally to support victims who are U.S. Citizens or Lawful Permanent Residents (LPRs) and victims who are foreign nationals.

The need for these vital services continues to escalate. OTIP's FY2021 Report⁸, the most recent available, indicates that OTIP grant-funded organizations in more than 200 cities and 41 states provided comprehensive case management services to 4,293 individuals, a 33 percent increase from FY20. OTIP's training and technical assistance center reached 119,000 health and human service providers in FY21, helping to improve the standard of care for trafficking survivors across the U.S.

OTIP grant funding is crucial to providing victims of both labor and sex trafficking the necessary aid and services once they have been identified as a victim. When U.S. citizens and LPRs experience trafficking, they suffer devastating consequences, including psychological and physical trauma, fear of law enforcement, family estrangement, and loss of housing and income. Specialized services are necessary to support survivors to recover and build a support system to prevent re-exploitation and revictimization. We support the department's decision to include legal services within the comprehensive services available to victims, as a critical component in a survivor's stabilization and recovery.

OTIP grant services reach vulnerable populations of U.S. citizens and LPRs including runaway and homeless youth, the LGBTQI+ community, Native Americans, Asian Americans and Pacific Islanders, Latinos, migrant workers, youth of color, children, low literacy or numeracy individuals, and those with disabilities.

⁸ <https://www.acf.hhs.gov/otip/report/hhs-office-trafficking-persons-annual-report-fiscal-year-2021>

Foreign nationals inside the U.S. who are trafficking victims confront similar challenges and circumstances and corresponding service needs. This has highlighted the ongoing and increasing urgency of certification letters, which are a lifeline, allowing foreign nationals who are trafficking survivors access to public benefits in the U.S. This rise in the issuance of certification letters corresponds to increasing numbers of survivors seeking help in the form of legal and social services. For example, HHS issued 1,200 eligibility letters to foreign national minors in FY2021 who were at risk of or had experienced human trafficking, a 78 percent increase over the previous year.

**Administration for Children and Families (ACF), National Human Trafficking Hotline:
\$8,500,000**

The National Human Trafficking Hotline is a toll-free 24/7 crisis line that serves as the backbone of the nationwide community response to victims and survivors. Through calls, chats, and texts, the Trafficking Hotline connects victims and survivors of human trafficking with appropriate trauma-informed services across the country (including emergency shelter, case management, and legal services). Calls can be answered in over 200 languages. The public is also able to submit tips and seek information via email and webform, and, when appropriate, the Hotline staff report actionable tips to law enforcement. The Trafficking Hotline's resource and referral directory contains almost 3,000 direct service providers, trained law enforcement officials, and other resources. Since the Trafficking Hotline's inception in 2007, the call volume to the hotline has increased more than forty-fold. In 2023, the Trafficking Hotline identified 9,619 cases of potential human trafficking; 16,999 victims were identified in those cases. The Trafficking Hotline is a trusted and vital component of America's whole-of-government anti-trafficking approach, however the cost of the program is not sufficiently funded, jeopardizing the quality and coverage available for victims and survivors who are in crisis. The need for the vital services that the Trafficking Hotline provides will only grow in FY26 and beyond.

The administration must also protect the Trafficking Hotline from proposals by state and local law enforcement agencies that information be provided to law enforcement whether or not a caller wishes that to happen. The Trafficking Hotline does alert law enforcement when appropriate, and a significant percentage of cases are referred, but many callers are seeking to connect with victim and survivor service providers, not police. It must be the victim's choice to trigger police intervention or press criminal charges.

**Administration for Children and Families, Runaway and Homeless Youth Act:
\$362,000,000**

We request a total of \$362,000,000 for ACF to implement Runaway and Homeless Youth Act (RHYA) programs, Title III of the Juvenile Justice & Delinquency Prevention Act. This is the amount included in the bipartisan, bicameral Runaway and Homeless Youth and Trafficking

Prevention Act of 2023 (S.3125/H.R.6041) which will make critical updates and fully reauthorize RHYA. RHYA programs have been chronically underfunded since its inception, despite these programs costing less than other systems that many youth experiencing homelessness and survivors of trafficking encounter. Everyone should have the opportunity to succeed regardless of their start in life, but young people who are trafficked and youth experiencing homelessness are not plugged into the networks, resources, and supports they need for healthy development.

Runaway and homeless youth are particularly at risk to become victims of trafficking because they lack basic life needs, such as shelter, food, health care, and are disconnected from systems of care and caring adults. An estimated 4.2 million young people (ages 13-25) experience homelessness annually, according to research from Chapin Hall at the University of Chicago. Consistently, data from the National Human Trafficking Hotline also show that being a runaway youth and unstably housed are two of the top risk factors for human trafficking. Numerous studies have found trafficking rates among youth experiencing homelessness ranging from 19 percent to 40 percent. Using the lower end estimate means that about 900,000 of the youth and young adults who experience homelessness in a year are also victims of sex trafficking or forced labor in cities, suburbs, rural communities, and American Indian Reservations across the country.

Research has found that the real cost of youth homelessness for taxpayers is an estimated \$24,326 per year, per individual, and \$351,985 over the lifetime of that individual.⁹ The social cost of youth homelessness, which includes other associated costs such as lost earnings, lost tax payments, public crime expenditures, victim costs, welfare support programs, excess tax burden, and public housing support, is an estimated \$26,433 per year, per individual, and \$869,647 over the lifetime of that individual.¹⁰ If we apply the annual social cost per youth of \$26,433 to the 4.2 million American youth who experience homelessness every year, the taxpayer burden is over \$111 billion per year. Over the lifetime of those 4.2 million youth, the economic burden of homelessness and its related social costs is over \$3.6 trillion. Through increased investments, all youth in need of safe and stable housing and supportive services can connect to the networks of support needed to stabilize, heal, and thrive. These connected youth in turn become part of the solution to trafficking and homelessness, and contribute to the community's well-being.

RHYA has provided base funding to communities across the country to develop community-based responses to youth and young adult homelessness and trafficking. These local systems of care are based on the unique needs of each region, their available resources, and local priorities. When we support young people experiencing homelessness, we prevent trafficking. RHYA programs are also trained in identifying and serving survivors of trafficking. Specifically, RHYA funds: emergency shelters, family reunification (when safe), aftercare, street outreach,

⁹ Foldes, S. & Lubov, A. (2015). *The Economic Burden of Youth Experiencing Homelessness and the Financial Case for Investing in Interventions to Change Peoples' Lives: An Estimate of the Short-and Long-Term Costs to Taxpayers and Society in Hennepin County, Minnesota*. Youth Link. <https://www.youthlinkmn.org/wp-content/uploads/2016/04/the-economic-burden-of-homeless-youth-in-hennepin-county.pdf>.

¹⁰ *ibid*

education, employment training, behavioral and mental health care, transitional housing, and independent housing options. This support achieves the following successful outcomes for youth: 1) safe exit from homelessness and hopelessness; 2) family reunification and/or establishment of permanent connections in their communities; 3) education, employment, and sustainable independence; and 4) prevention of human trafficking. Further, these programs are best positioned to prevent trafficking and commercial sexual exploitation and provide early identification of and services to youth victims of crimes.

Administration for Children and Families, Office of Refugee Resettlement: \$5,000,000

In light of the Flores decision, Office of Refugee Resettlement (ORR) facilities are required to release unaccompanied minors when they reach their 18th birthday. In cases where reunification has not yet been achieved, youth are released to shelters, unstable situations, or homelessness. In order to meet the needs of these unaccompanied youth, the majority of whom need only short-term support, we request \$5 million to the Administration on Children and Families to provide funding to support ORR unaccompanied youth who transition out of ORR facilities that are not yet reunified. This funding is to follow the youth who have not been reunified and can be given to community-based youth organizations who provide housing, supportive services, reunification support, travel, education, employment, or translation.

In addition, adequate funds should be directed to ORR to manage the temporary placement of unaccompanied minor immigrants applying for asylum. The increase in child migrants has overwhelmed ORR's capacity to vet sponsors and maintain contact.

Highly Vulnerable Populations Study: \$2,000,000

We request \$2,000,000 to be directed to HHS to study the prevalence, characteristics, and needs of programs serving homeless youth in the U.S. Because homeless and human trafficked youth are often indiscernible and unwilling to disclose their housing and victimization status, a 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 America.

DEPARTMENT OF EDUCATION

Department of Education Grants to Local Education Agencies, Title I: \$2,000,000

We request \$2,000,000 for the Department of Education (ED) to help identify victims of sex trafficking and forced labor, and to prevent the victimization and exploitation of those children who might be susceptible to this crime. The funds should be used to develop materials regarding

all forms of human trafficking, including forced labor and sex trafficking, to ensure that educators and students are aware of how to identify and treat all types of trafficking. Further, we request that ED publish a white paper examining the appropriate role of educators and students, as well as the role of the education system, in preventing, identifying, and supporting child trafficking victims. The outcome of the white paper should inform the development of a model curriculum on the prevention of both sex trafficking and forced labor.

ED interfaces with approximately 50 million elementary and secondary school children each year, and is, therefore, in a unique position to reach vulnerable youth; they should consult stakeholders—including educators, NGOs, both forced labor and sex trafficking survivors—on the development of materials, the white paper, and the model curriculum.

**McKinney-Vento Act Education for Homeless Children and Youth Program:
\$300,000,000**

We request \$300,000,000 to implement the Education for Homeless Children and Youth program (EHCY), as authorized by section 722(d)(3) of the McKinney-Vento Act as amended by the Every Student Succeeds Act (ESSA) (P.L. 114–95). EHCY removes barriers to the enrollment, attendance, and opportunity for success for children and youth experiencing homelessness; all of whom are at high risk of human trafficking. The EHCY is effective in addressing child and youth homelessness. With the support of EHCY grants, local education agencies have provided identification, enrollment and transportation assistance, as well as academic support and referrals for basic services. The EHCY has given children and youth experiencing homelessness the extra support they need to enroll and succeed in school.

Unfortunately, the resources directed to child and youth homelessness programs have not been sufficient in recent years. Child and youth homelessness remains on the rise in the United States, with nearly 1.4 million students from preschool through 12th grade identified as homeless in the 2022-2023 school year, a 14 percent increase from the previous school year. However, only 22 percent of school districts receive support through the vital EHCY program in any given year. As a result, homeless children and youth are under-identified and continue to face significant barriers to school enrollment and continuity.

Children and youth experiencing homelessness are particularly at risk for human trafficking. Under the McKinney-Vento Act's EHCY, all school districts are required to designate a homeless liaison, who proactively identifies children and youth experiencing homelessness, connecting them to vital services like food, housing, and clothing. Under the Act, school districts are also required to provide transportation to stabilize the educational experiences of homeless students. Because all school districts — even those in communities without youth shelters — must designate a liaison for homeless students, schools are uniquely positioned to identify youth who are being trafficked, or are at risk of being trafficked, and provide connections to services. Yet many liaisons are designated in name only, and lack the time and training to carry out their

duties. This lack of capacity is particularly severe in light of the increase in student homelessness. Increasing funding for the EHCY will support a dedicated infrastructure within the nation's public schools to identify and serve children and youth at high risk of trafficking.

DEPARTMENT OF STATE

Office to Monitor and Combat Trafficking in Persons/J/TIP

Trafficking in Persons Grants: Total: \$140,000,000

1) International Narcotics Control and Law Enforcement (INCLE) TIP Grants: \$90,000,000

INCLE grants enable nonprofits, non-governmental organizations, public international organizations, and universities to fight human trafficking internationally through prevention programs, training workshops for law enforcement and the judiciary, and legal and strategic support. These grants provide specialized training for law enforcement officers to recognize trafficking and forced labor, conduct investigations, assist with prosecutions, and support victims. These funds are critical to ensuring that victims are identified and protected, traffickers are convicted, and systems and policies are in place to prevent future trafficking.

2) International Narcotics Control and Law Enforcement (INCLE), Child Protection Compacts (CPCs): \$12,500,000

State Department CPCs support policies and programs that prevent and respond to violence, exploitation, and abuse against children, and measurably reduce the trafficking of minors by building sustainable and effective systems of justice, prevention, and protection. This assistance can be provided in the form of grants, cooperative agreements, or contracts to or with national governments, regional or local governmental units, or non-governmental organizations with expertise in the protection of victims of severe forms of human trafficking. CPCs have been established in Columbia, Ghana, Jamaica, Mongolia, Peru, Philippines, and Côte d'Ivoire. Funding will help the program continue and expand.

3) Program to End Modern Slavery (PEMS): \$37,500,000

Congress authorized the Program to End Modern Slavery (PEMS) to advance transformational programs and projects that seek to achieve a measurable and substantial reduction of the prevalence of modern slavery in targeted populations in priority countries. This funding, administered by J/TIP, should complement existing

anti-trafficking programs, while protecting existing foreign assistance for human rights, development, humanitarian aid, and democracy. One important area funded by PEMS is the development of cost effective and reliable methods to measure the prevalence of human trafficking in hot spots around the world through the Prevalence Reduction Innovation Forum, which can help create rigorous standards for measuring the impact of federally-funded anti-trafficking projects.

Office to Monitor and Combat Trafficking in Persons (J/TIP) Administration: \$25,000,000

J/TIP provides funding and tools to assist governments that have the will to change, but lack financial resources to do so. U.S. leadership through the J/TIP office continues to elevate worldwide awareness and advance global responses to human trafficking. These resources are needed to strengthen collaboration with posts and regional bureaus, to enable J/TIP to encourage foreign governments to comply with minimum standards in the Trafficking Victims Protection Act (TVPA), and to facilitate implementation of the tier ranking system and publication of the annual Trafficking in Persons Report (TIP Report). These resources will enable J/TIP to provide additional expertise in prosecution and prevention strategies; address performance gaps, particularly for Tier 2 Watch List countries; and support ongoing reporting and grant functions to achieve the TVPA's standards and build in-country capacity. Additionally, this funding will support the Senior Policy Operating Group and the President's Interagency Task Force, which J/TIP convenes, to coordinate anti-trafficking efforts across the U.S. Government.

We request that up to \$600,000 of this funding be dedicated to support J/TIP's administration of the United States Advisory Council on Human Trafficking, which was created by Congress in the Survivors of Human Trafficking Empowerment Act (section 115 of Public Law 114-22), and whose mandate has been extended indefinitely by the Abolish Trafficking Reauthorization Act of 2022 (section 102 of Public Law 117-348). The council provides advice and recommendations to the Senior Policy Operating Group and the President's Interagency Task Force to Monitor and Combat Trafficking, as well as directly to federal agencies. We applaud the U.S. Government for working with survivors, who are in the best position to analyze and recommend policies that have the greatest impact. This request would fund support staff for council convenings, council member travel expenses and per diem, consulting fees for council members and other authorized activities.

Bureau of Democracy, Human Rights, and Labor (DRL), DRL Grants: \$25,000,000

Of the amounts provided for the Bureau of Democracy, Human Rights and Labor (DRL), we request \$25,000,000 specifically for activities to support labor rights, labor recruitment reform, corporate accountability activities, and efforts to combat gender-based violence (a contributing root cause of human trafficking). We encourage DRL to prioritize activities centered on

advocacy and capacity building aimed at supporting survivors, advocates, and survivor-advocates. To this end, public-private partnerships and other forms of multi- and cross-sector engagement ensure more inclusive and sustainable support in preventing and addressing violence, trafficking, and exploitation. These important programs strengthen multi-stakeholder engagement in areas including, but not limited to, labor and sexual exploitation in supply chains (including products or services exported to the United States). Examples of these programs include anti-child labor initiatives in cotton and cocoa, efforts to support Brazil's national plan against slave labor, capacity building for local labor monitoring and worker organizations, efforts to combat entrenched forms of slavery in Mauritania, Mali and Senegal, and initiatives to address the particular vulnerability of migrant workers and other vulnerable populations to forced labor and other forms of abuse and exploitation.

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

Bureau for Democracy, Human Rights and Governance (DRG); Justice, Rights and Security Team; Counter-Trafficking in Persons (C-TIP) Program Integration: \$22,000,000

Within the budget for the U.S. Agency for International Development's Bureau for Democracy, Human Rights and Governance, we request \$17,000,000 in support for counter-trafficking projects at USAID missions and \$5,000,000 to support the Justice, Rights and Security Team's efforts at headquarters to integrate anti-trafficking work into other USAID programs including but not limited to health, food security, disaster response, and economic development. Of these funds, \$2,000,000 should be allocated for countering trafficking in persons from Mexico, Guatemala, Honduras, and El Salvador.

USAID updated its C-TIP policy in 2021, and funding is needed to provide global coordination at headquarters and to support a growing demand by missions to launch integrated anti-trafficking programs. Approximately half of the anti-trafficking projects being proposed by missions are rejected for lack of resources. Those that are approved have resulted in funding being diverted from other human rights initiatives.

Effective integration of robust anti-trafficking analysis, evaluation, and interventions across the range of assistance programs, bureaus and missions is critically important. Such integration can: a) ensure that foreign assistance efforts do not inadvertently leave vulnerable community members behind, or even increase their vulnerability; b) generate new avenues and opportunities to maximize the impact on trafficking issues by U.S. investments and enhance the impact of existing interventions; and c) help reinforce and support broader development objectives.

The effectiveness of foreign assistance in reducing poverty and generating economic development relies in part on community resilience against human trafficking. We know from a growing body of evidence that the benefits of freedom from forced labor to a community include improved outcomes for education, medical care, food security, income generation, wage levels, family debt, civic and gender participation, and the rule of law. These social improvements, in turn, reduce vulnerability to trafficking.

Further, we recognize that human trafficking is inexorably linked to current global challenges of climate change, migration (including conflict-related migration), and international trade. For these reasons, we request funding for a greater emphasis on implementation of anti-trafficking strategies in the field, by requiring a point of contact and mandatory training in anti-trafficking policies and programs for USAID staff in missions. It is critical that all USAID staff know, understand, and implement the agency's anti-trafficking policies and integration strategy. All future Country Development Coordination Strategies, as well as Regional Development Coordination Strategies, must integrate robust C-TIP approaches.

The requested headquarters funding would support USAID staffers in C-TIP policy education and implementation activities throughout the agency. These include periodic training sessions and a help-desk function for mission-based staff seeking guidance on C-TIP policy implementation, as well as assistance to missions in conducting landscape analyses, project design and monitoring, evaluation, and learning. The funding would also support headquarters staffers to accurately report USAID anti-trafficking expenditures to Congress and to the Justice Department and State Department for their annual anti-trafficking reports.

**Bureau for Democracy, Human Rights and Governance, Global Labor Program:
\$20,000,000**

We request \$20,000,000 for USAID's Global Labor Program (GLP). The GLP plays a crucial role in addressing the underlying root causes of human trafficking and strengthening labor rights and workers' organizations around the world. The GLP strengthens human trafficking prevention initiatives by supporting coordinated cross-border and regional programs that improve the economic, social, and democratic development of vulnerable workers, including migrant, informal economy, and women workers. These workers are particularly vulnerable to human trafficking, forced labor, and gender-based violence. The GLP also supports country-based regional and global programs on adherence to core labor standards.

Human Rights Grants Program: \$1,000,000

We request \$1,000,000 to support USAID's Human Rights Grants Program, which is available to USAID missions around the world to address human rights objectives or support integration of

human rights issues across all development initiatives. ATEST urges these funds be used for anti-trafficking specific grants to in-country NGOs, with an emphasis on cross-sectoral programming.

DEPARTMENT OF JUSTICE

Office of Justice Programs; State and Local Law Enforcement Assistance Victim Services Grants and Human Trafficking Task Forces: \$140,000,000

To attempt to meet the growing needs of victims and survivors, we request \$140,000,000 for human trafficking survivors and law enforcement through the Office of Justice Programs victim services grants and human trafficking task forces.

Survivors of trafficking are seeking assistance in greater numbers. The National Human Trafficking Hotline, which maintains a nationwide database of service providers for victims, reports that calls for help have dramatically increased by 172 percent from 2017 through 2022. Data from the Trafficking Hotline and anecdotal evidence from service providers demonstrate that insufficient resources remain a significant barrier for survivors. For example, service providers report an increase in survivor requests for rental assistance, medical cost coverage and food vouchers. While some of these growing requests could be met, service providers had to negotiate with landlords and medical providers to accept lower rent and medical bill payments because funding was insufficient to cover these costs.

Given the increased vulnerability survivors face through financial, legal and social instability, we request that no less than \$120,000,000 of the budget allocation be for victim services including intensive case management, and legal and shelter services. While housing needs remain one of the biggest resource scarcities for human trafficking victims, service provider funding must be comprehensive and meaningfully address food insecurity, the need for clothing, medical, dental and mental health care and treatment, and financial instability from un/under-employment, lack of educational opportunities, and other inequities. We request that the Office for Victims of Crime (OVC) review monies granted to law enforcement task forces to ensure the task forces are adopting and implementing victim-centered approaches. OVC has done an efficient and effective job in administering victim services grants but additional FTE positions are needed. Victims of human trafficking are all genders, adults and children, and include both U.S. citizens and foreign nationals. OVC's current program provides critical services to all of these victim groups in a carefully balanced program as authorized by the Trafficking Victims Protection Act (P.L.106-386).

Office of Justice Programs, State and Local Law Enforcement Assistance Minor Victim Services Grants: \$12,000,000

We request \$12,000,000 to support services, training and outreach for labor-trafficked youth. Specialized, comprehensive, trauma-informed and gender specific assistance to minor victims of human trafficking is critical. Minors face significant hurdles recovering from the abuse and trauma they have endured. Law enforcement has identified the lack of specialized housing programs throughout the U.S. as the greatest obstacle in effectively prosecuting those who victimize/traffic children. The Attorney General is authorized to provide grant funding to serve sex-trafficked minors.

Providing services to labor-trafficked children is imperative given that the federal definition of human trafficking includes both sex trafficking and forced labor. Furthermore, labor trafficking victims, regardless of age, can experience the same types of trauma, physical, sexual and psychological abuse seen in sex trafficking cases. Often, minors only receive support for sex trafficking recovery.

Legal Activities; Civil Rights Division; Human Trafficking Prosecution Unit: \$8,000,000

The Human Trafficking Prosecution Unit (HTPU) houses the federal government’s top legal experts on prosecuting human trafficking. Trafficking cases are resource-intensive because they are procedurally complex and frequently involve multiple jurisdictions and defendants. Research by the Human Trafficking Institute indicates that defendants in HTPU cases consistently receive longer sentences than cases handled by other prosecutors. HTPU prosecutions have overwhelmingly focused on sex trafficking, but that is likely to change. The Abolish Trafficking Reauthorization Act of 2022 (P.L. 117-347 Section 406 (a)) directs the Attorney General to establish a 10-agent team within the FBI to investigate labor trafficking violations. (Budgeting for this unit is covered later in this letter in the section on the FBI). Robust funding for the HTPU will ensure labor trafficking cases receive appropriate prosecution. Additionally, the Abolish Human Trafficking Act (P.L. 115-392) provides that the Attorney General designates at least one Assistant U.S. Attorney as a Human Trafficking Justice Coordinator in each Federal judicial district who works with a human trafficking witness specialist to assist with the national strategy, conduct public outreach and awareness, prosecute, ensure collection of data, build partnerships, and encourage the collection of restitution for human trafficking victims. HTPU is responsible for supporting the ongoing training of these prosecutors.

National Institute of Justice, Prevalence Methodology & Study: \$7,000,000

We request \$7,000,000 for the National Institute of Justice (NIJ) to continue research and develop methodologies to assess the prevalence of human trafficking in the United States, as

mandated by the Trafficking Victims Protection Act of 2017 (P.L. 115-393 Sec. 401(a)). Funding will allow NIJ to continue research focused on specific geographies, economic sectors, and different forms of trafficking. For the past several years, the global anti-trafficking 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 to changes in policies and interventions. This is only possible through granular research that assesses different forms of human trafficking among distinct communities. This research is essential to inform future budgeting decisions. Conducting pilot studies that target specific high-prevalence regions, economic sectors, and population groups is a crucial step in developing a comprehensive and accurate nationwide prevalence study. The United States already invests significant resources to measure human trafficking prevalence abroad; it is essential to invest in measuring prevalence domestically if we are to continue as a leader in the global anti-trafficking field. Work has already begun in this area. A 2024 federally-funded report from RAND Corp. found: “there is a lack of consensus on indicators and definitions of trafficking, prevalence is measured without any discussion of what to do with those estimates or how to use them to better serve people who experience trafficking...[and] there is limited focus on how prevalence estimates can be used to assess the effectiveness of various interventions and preventions”¹¹. These findings underscore the need for continued research.

Federal Bureau of Investigation: \$2,000,000

We request \$2,000,000 for an FBI team of not less than 10 agents to specialize exclusively in the investigation of labor trafficking violations, as authorized by the Abolish Trafficking Reauthorization Act of 2022 (P.L. 117-347 Section 406 (a)). The FBI is a critical law enforcement partner in fighting human trafficking. The presence of the FBI in trafficking investigations significantly increases the chances of success. With trafficking investigations often crossing state lines, the presence of the FBI becomes critical. Federal law enforcement efforts, however, have focused too heavily on sex trafficking, leaving those trafficked on farms; in factories, restaurants and hotels; at mines and construction sites; and in private homes as domestic and home health care workers without adequate law enforcement protection. The congressionally-mandated FBI team is a critical step to correct this imbalance by assisting survivors who choose to press charges and bring traffickers to justice.

¹¹ https://www.rand.org/pubs/research_reports/RRA108-

DEPARTMENT OF HOMELAND SECURITY

DHS Immigration and Customs Enforcement, Homeland Security Investigations, Center to Counter Human Trafficking (CCHT), \$146,000,000:

Congressional Authorization Streams, \$36,000,000:

The 117th Congress authorized three critical funding streams for DHS to combat human trafficking, totaling \$36,000,000.

- The Countering Human Trafficking Act (Public Law 117-322) has mandated the coordination of 16 DHS anti-trafficking programs and staff into the Center for Countering Human Trafficking (CCHT). The law authorizes \$14,000,000 for the center, requires minimum staffing of 45 employees, directs the new unit to broaden its historical focus on sex trafficking to include increased attention on forced labor, and instructs CCHT to take a victim-centered approach in programming and modernize its infrastructure.
- The Trafficking Victims Prevention and Protection Act (TVPPA) of 2022 (Public Law 117-348 section 202) includes a \$20,000,000 authorization for DHS to fund enforcement of Section 307 of the Tariff Act of 1930 (19 USC 1307) and section 910 of the Trade Facilitation and Trade Enforcement Act of 2015 (P.L. 114-125), which both prohibit the importation into the U.S. of goods produced by child or forced labor.
- The Abolish Trafficking Reauthorization Act of 2022 (Public Law 117-347 section 406 (d)) includes a \$2,000,000 authorization and mandates that DHS create a team of not less than 10 agents within the CCHT to exclusively investigate forced labor violations.

DHS Immigration and Customs Enforcement, Homeland Security Investigations, Center to Counter Human Trafficking (CCHT), Customs and Border Protection: Tariff Act Enforcement and Uyghur Forced Labor Prevention Act Enforcement, \$110,000,000:

We request \$110,000,000 for Customs and Border Protection (CBP) for efforts to fully implement the Uyghur Forced Labor Prevention Act (Public Law 117-78) (UFLPA) and expand enforcement of Section 307 U.S. Tariff Act. Of that total amount, we request no less than \$20,000,000 be specifically allocated for CBP to enhance its Tariff Act enforcement efforts, including increasing investigations, issuing more Withhold Release Orders (WROs) and Findings, and imposing more civil and criminal penalties for forced labor violations. The funds should be used to hire new analysts for CBP's Forced Labor Division (Office of Trade) and any other CBP personnel as needed to support forced labor investigations. Funding would also

support the Forced Labor Division within the Office of Trade to self-initiate investigations of particular types of goods suspected to be produced under conditions of forced labor; provide training to CBP officers and investigatory staff on forced labor; conduct effective investigations within reasonable timelines; publicly disclose WRO enforcement data every quarter; oversee forced labor remediation efforts in consultation with civil society and affected workers; conduct quarterly meetings with civil society groups and other stakeholders; develop new technologies and targeting practices to identify and inspect cargo that may be produced with forced labor; and enhance coordination with counterparts in Canada and Mexico to monitor cross-border movement of such goods.

CBP currently lists 51 active WROs and 8 Findings in its online dashboard. More than half a billion dollars in tainted imports have been kept out of the U.S. marketplace in recent years. CBP's new online Uyghur Forced Labor Prevention Act dashboard notes that 3,976 shipments worth \$3.5 billion have already been denied entry to the U.S. to date. While we applaud this sustained attention on UFLPA enforcement by CBP, in the past two years CBP has issued only two WROs under its Section 307 enforcement authority. CBP needs additional resources to continue fulfilling its expanding mandate to prevent the importation of goods made by forced labor globally. The U.S. Government Accountability Office has written several reports highlighting CBP's need for more resources.

DHS Immigration and Customs Enforcement, Homeland Security Investigations, Center to Counter Human Trafficking (CCHT), Office of Victims Assistance, \$54,400,000:

We recommend the CCHT establish a formal Office for Victims Assistance to provide national oversight to ensure that all employees of Immigrations and Customs Enforcement comply with all applicable federal laws and policies concerning victim rights, access to information, advisement of legal rights, just and fair treatment of victims, and respect for victims' privacy and dignity; and to oversee and support specially trained victim assistance personnel through guidance, training, travel, technical assistance, and equipment. This office would ensure that requests to DHS for "continued presence" determinations are made fairly and expeditiously to prevent migrants who are trafficking victims from being deported. This office could help ensure that unaccompanied minors at the southern border are properly screened to determine if they are trafficking victims, as required by law. We recommend that \$20,000,000 of these funds be used to support no less than five Victim Witness Coordinators to support victims interacting with law enforcement and ensure that the agency's response to this crime is centered on helping victims and not solely on arresting perpetrators.

U.S. Citizenship and Immigration Services (USCIS), \$5,000,000:

We recommend an additional \$5,000,000 to U.S. Citizenship and Immigration Services (USCIS) to expand capacity in adjudicating T-visa applications. Congress established the T-visa program with bi-partisan support in 2000 to enable foreign national trafficking victims to remain in the U.S. to assist U.S. law enforcement during the investigation and prosecution of their traffickers¹²The Department of Homeland Security designed the T-visa with the dual purpose of stabilizing trafficking victims and promoting cooperation between law enforcement and trafficking victims. The T-visa encourages human trafficking victims to report their victimization to law enforcement and enables victims to participate in the detection, investigation or prosecution of the crimes committed against them, even if they lack lawful immigration status. USCIS should increase staffing to ensure T-visa applications are quickly adjudicated because survivors may be vulnerable to revictimization while awaiting visa status determinations.

We have carefully vetted our requests to focus on the most important and effective programs. We thank you for your consideration and leadership. If you have any questions, please contact ATEST Director Terry FitzPatrick (terry.fitzpatrick@atest-us.org or 571-282-9913).

Member organizations of the ATEST coalition (www.endslaveryandtrafficking.org):

Coalition to Abolish Slavery and Trafficking (CAST)

Coalition of Immokalee Workers

Covenant House

Free the Slaves

HEAL Trafficking

Human Trafficking Legal Center

Humanity United Action

McCain Institute

National Network for Youth

Polaris

Safe Horizon

Solidarity Center

United Way Worldwide

Verité

Vital Voices Global Partnership

ATEST is a U.S.-based coalition that advocates for solutions to prevent and end all forms of forced labor, human trafficking and modern slavery around the world.

¹² <https://www.uscis.gov/sites/default/files/document/guides/T-Visa-Law-Enforcement-Resource-Guide.pdf>