



February 27, 2026

Acting Director Rachel M. Poynter  
Office to Monitor and Combat Trafficking in Persons  
U.S. State Department  
Washington, D.C.

Via email: [tipreportUS@state.gov](mailto:tipreportUS@state.gov)

RE: Request for Information for the 2026 Trafficking in Persons Report, United States Government (State Department Public Notice: 12906)

Dear Ms. Poynter:

Thank you for the opportunity to participate in the creation of the 2026 Trafficking in Persons Report. The TIP Office's diligence in soliciting and integrating information from civil society organizations bolsters the credibility of the TIP Report as a tool to promote global governmental action.

ATEST is a U.S.-based coalition that advocates for solutions to prevent and end forced labor and human trafficking around the world. We advocate for 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 in more than 30 U.S. cities and 100 countries provides our coalition with an unparalleled breadth and depth of expertise. ATEST provides U.S. policymakers with detailed recommendations for action. Our broad-based [policy memorandum](#) to the Trump Administration includes urgent recommendations for the 2025-2029 timeframe, including proposals for the TIP Office itself. This detailed memorandum includes recommendations that would remedy many of the deficiencies noted in our comments below. Learn more about ATEST [here](#).

## INTRODUCTION

- **Tier 2 Placement for the U.S.:** ATEST recommends consideration of a Tier 2 ranking for the U.S. in the 2026 Report. During the evaluation period (April 1, 2025 to March 31, 2026), the U.S. government has made significant cuts to anti-trafficking programs, dramatically reducing its effort and failing to demonstrate appreciable progress to meet the

minimum standards detailed in the Trafficking Victims Protection Act. While there have been important accomplishments and innovations by the U.S. during the evaluation period, they are overwhelmingly outweighed by deficiencies. No other country that has scaled back its anti-trafficking efforts so dramatically in one year would receive a Tier 1 Ranking; the same rigor should apply to a U.S. tier ranking as well.

- **International Programs Affect U.S. Citizens, Businesses and Communities:** ATEST urges the TIP Report team to not only evaluate the impact of anti-trafficking programs operating wholly inside the United States when determining the U.S. tier ranking and compiling its country narrative, but to recognize that America’s internationally-focused programs impact U.S. national security and economic prosperity at home. Traffickers overseas not only harm individuals in other countries, they harm businesses in the U.S. through unfair price competition in international trade. Forced labor scam centers overseas target U.S. households. Forced labor in agriculture, mining and other sectors overseas fuels armed conflict that impacts U.S. national interests. Trafficking overseas forces individuals to flee to the United States to seek safety. Many of the most significant cuts in the past year in U.S. programs have focused on anti-trafficking activities conducted overseas. These reductions in effort to combat trafficking must be considered in determining the U.S. Tier Ranking for the 2026 Report.
- **Importance of Civil Society:** The government cannot combat trafficking alone; it must partner with nongovernmental organizations (NGOs) at every level. NGOs provide the expertise and infrastructure to implement strategically-targeted, cost-effective programs. NGOs conduct vital prevention and protection activities, as well as assisting law enforcement in prosecutions. Partnerships with NGOs are often described as the fourth “P” in combating trafficking. Most (but not all) federal anti-trafficking offices have continued to function throughout the 2026 TIP Report evaluation period, but the grantmaking capacity of these offices to contract with NGO implementers has been slashed. Contracts have been cancelled mid-work, leaving trafficking victims and survivors without assistance. In some instances, anti-trafficking NGOs have been forced to lay off more than half their staff. This contraction, triggered by federal action, has contributed to a reduction in effort by the U.S. government to meet the TVPA’s minimum standards.

## **U.S. ACCOMPLISHMENTS DURING THE EVALUATION PERIOD**

- **Trafficking Survivors Relief Act ([H.R. 4323](#)):** Congress passed (with overwhelming bipartisan support) and the President signed legislation allowing trafficking survivors to ask courts to overturn federal convictions and clear their records for some crimes (though, notably, not all crimes) they were forced by their traffickers to commit. Most states have

enacted vacatur and expungement laws; passage of the federal statute closes a significant gap to provide similar relief at the national level.

- **Epstein Files Transparency Act (H.R. 4405):** Congress passed (nearly unanimously) and the President signed legislation ordering the release of millions of files related to child sex offender and accused trafficker Jeffrey Epstein. Not all Epstein files are related to trafficking offenses, but enactment of the law demonstrated responsiveness to survivors who demanded transparency and justice. It will be important moving forward to ensure the U.S. government follows the letter of the law, and not just the spirit, ensuring complete document disclosure and the prosecution of trafficking perpetrators revealed in the files.
- **Sex Trafficking Survivor Compensation:** The Justice Department launched a \$200 million [remissions fund](#) to provide compensation for sex trafficking survivors who can trace their exploitation to backpage.com. The funding came from assets seized by the government in litigation to close the website. The Human Trafficking Legal Center [notes](#) that, typically, “courts fail to order criminal restitution for trafficking survivors, despite the fact that it is mandatory,” and “prosecutors fail to collect restitution, even when it is ordered by a federal court.” The Backpage program, [according](#) to the Justice Department, “marks the largest remission process to date to compensate victims of human trafficking.”
- **Bilateral Forced Labor Trade Bans & Withhold Release Orders:** While advancing new bilateral trade pacts, the U.S. government has included provisions to prohibit forced labor and reduce worker vulnerability to trafficking in countries that export products to the United States. For example, the trade pact with Indonesia, [described](#) on the White House website February 19, 2026, includes this description: “Indonesia has committed to adopt and implement a forced labor import ban and remove provisions from its labor laws that restrict workers and unions from fully exercising freedom of association and collective bargaining rights.” Similar provisions are included in pacts with Cambodia, El Salvador, Guatemala, Argentina, Bangladesh and Taiwan. Trafficking overseas affects the American homeland, so American initiatives to reduce international exploitation benefit U.S. security and economic interests. Because forced labor import bans are now a central part of U.S. trade strategy, the United States should back up these commitments with practical, sustained technical support for trading partners. Traditional “aid for trade” programs should clearly include resources to help countries strengthen and effectively carry out their existing laws, improve customs and import control systems, and build the capacity of labor inspectorates and enforcement agencies. U.S. leadership in providing this kind of hands-on assistance — and in encouraging coordination across governments — will be critical to making sure forced labor prohibitions work in practice, not just on paper. With stronger enforcement systems and better supply chain oversight, trading partners will be better equipped to prevent worker exploitation and keep goods made with forced labor out of

global supply chains and the U.S. market, where they harm responsible businesses and undercut American workers. The U.S. also increased the number of Withhold Release Orders under Tariff Act authority during the 2026 TIP Report evaluation period, blocking the import of goods made with forced labor. The Customs and Border Protection online dashboard shows six new WROs. While this is a significant increase over previous years, it remains a very low level of enforcement.

- **Scam Center Crackdown:** The White House [reports](#) the U.S. has “sanctioned more than 100 online scam operators, many of which used forced labor to seize billions of dollars from defrauded Americans and others worldwide.” This follows a special focus on these centers in previous TIP Reports. Efforts to address overseas online scam centers are welcome. However, the closure of scam center compounds has not followed a victim-centered approach, and in one case, Cambodia, it has resulted in a humanitarian crisis. Trafficking survivors there are urgently seeking resources and are facing detention due to the Cambodian government categorizing these workers as undocumented migrants instead of victims of forced labor trafficking. Meanwhile, experts believe the industry is unlikely to disappear without sustained comprehensive efforts and further sanctions, arrests and seizure of assets of the well-known and documented largest operators, but instead will continue to flourish and transform, including into smaller, less traceable compounds and units.

## U.S. DEFICIENCIES DURING THE EVALUATION PERIOD

- **Failure to Fully Reauthorize the Trafficking Victims Protection Act (TVPA):** Two bills ([one](#) passed by the Senate as an amendment to its initial version of the National Defense Authorization Act but not supported by the House, and [one](#) approved by the House Foreign Affairs Committee but awaiting floor action) have failed to receive final passage so far in the 119<sup>th</sup> Congress. Provisions of the TVPA included in these bills lapsed four years ago, leaving significant gaps in the U.S. government’s anti-trafficking effort, including: 1) Funding authorization for trafficking victim and survivor programs in the U.S. Department of Health and Human Services, including funding to operate the National Human Trafficking Hotline; and, 2) Funding authorization for the State Department’s Office to Monitor and Combat Trafficking in Persons, which creates the annual Trafficking in Persons Report, runs the President’s Interagency Task Force on Human Trafficking and the Senior Policy Operating Group to coordinate anti-trafficking programs across federal agencies, supports the U.S. Advisory Council on Human Trafficking, and provides grants that support governmental and nongovernmental anti-trafficking programs around the world.

- **Elimination of USAID’s Counter-Trafficking Program:** The closure of the U.S. Agency for International Development in 2025 included shuttering the agency’s Counter Trafficking in Persons (CTIP) unit, which oversaw approximately \$47 million in anti-trafficking programs in 24 countries. The CTIP office had developed a global innovation: the integration of anti-trafficking strategies and activities into planning and operations of all U.S. humanitarian and international development assistance programs. This strategy improved the reach and cost-efficiency of anti-trafficking work and recognized trafficking is a barrier that prevents foreign assistance programs – such as lifesaving disaster response and public health, as well as economic development, education, sanitation and food security – from reaching potential beneficiaries. Closure of the CTIP office reduces America’s effort to combat human trafficking, and as noted above, trafficking overseas affects the national security and economic prosperity of the United States. The House Foreign Affairs Committee passed a [provision](#) in 2025 to require the U.S. government to integrate anti-trafficking considerations into foreign assistance activities transferred from USAID to the State Department, but the provision has failed so far to receive full House consideration.
- **Elimination of Labor Department Anti-trafficking Grants:** Cutbacks at the International Labor Affairs Bureau (ILAB) in 2025 included the termination of more than \$500 million in grants to combat forced and child labor, with approximately 50 projects throughout the world ordered to stop work and shutter immediately. ILAB’s core staff and budget were also reduced. ILAB creates an authoritative list of tainted goods prohibited from importation into the U.S. This publication is an invaluable resource for American companies assessing the risks of investing or conducting business in foreign countries, as well as U.S. customs officials who block tainted imports from unfairly competing with American industries. The cutbacks at ILAB’s headquarters reduce this vital investigatory effort by the U.S. government to combat trafficking and its effects on the American economy. The complete elimination of ILAB grants to organizations that provided targeted upstream trafficking prevention in supply chains for American businesses, further reduces the U.S. effort to combat human trafficking abroad and its impacts at home.
- **Reductions in Staffing, Funding and Status at State Department Office to Monitor and Combat Trafficking in Persons (TIP Office):** The U.S. government has enacted severe staffing cuts at the TIP Office, eliminating more than half the staff, including specialists who create the annual TIP Report and advise the administration on sanctions for Tier 3 countries who fail to meet TVPA minimum standards. Many TIP Office grants to NGO implementers have been cancelled or scaled back mid-project. The government has failed to appoint a new ambassador-at-large to head the office, as is required by law, reducing America’s diplomatic leverage in addressing trafficking overseas (which impacts

U.S. security and prosperity). The previously stand-alone TIP Office was merged in 2025 into another bureau inside the State Department, seen by many in the sector ([including a former TIP ambassador](#)) as a “demotion” that reduces its status and influence within the department and the world.

- **Reductions in Government Coordination, Data Gathering, Public Transparency:**

- **PITF:** The President’s Interagency Task Force to Monitor and Combat Trafficking in Persons (PITF) hasn’t met since February 13, 2024. The PITF, which coordinates anti-trafficking work among 20 federal agencies, elevates the issue of human trafficking to the cabinet level. Each year, the president's cabinet is required by law to meet and discuss the previous year’s accomplishments and the coming year’s priorities. This coordination at the highest level, livestreamed for public access, has been a hallmark of America’s whole-of-government approach. Failing to convene the PITF is a reduction in effort by the U.S. government to combat trafficking.
- **SPOG:** The Senior Policy Operating Group (SPOG) Procurement and Supply Chains Committee did not conduct a public meeting during the 2026 TIP Report evaluation period. The SPOG consists of senior officials from PITF agencies, and in past years, the Procurement and Supply Chains Committee invited contracting companies, NGOs, international partners, and associations of state, local, tribal, and territorial officials to build understanding and awareness about the anti-trafficking requirements of the Federal Acquisition Regulation (FAR) and answer questions about enforcement. The FAR prohibits the use of federal tax dollars to procure goods or services tainted by human trafficking, forced labor or child labor. The SPOG’s public engagement and transparency should resume because information about U.S. government enforcement of the FAR is critical. For example: during the 2026 TIP Report evaluation period a federal contractor asked the Supreme Court (SCOTUS) to block a suit by forced labor victims held in the company’s private immigration detention facility, an allegation of forced labor committed with taxpayer funds. The company asserted that Immigration and Customs Enforcement contractors enjoy immunity because they are agents of the government. (SCOTUS [rejected](#) the argument and allowed a trial in the case to proceed.)
- **A.G. Report:** The Attorney General’s Annual Report to Congress on U.S. Government Activities to Combat Trafficking in Persons hasn’t been published since Fiscal Year 2023. This report aggregates essential data for Congress and the public to assess how U.S. tax dollars are spent and their impact. Failing to publish the report is a reduction in effort by the U.S. government to combat trafficking.

- **Advisory Council Report:** The U.S. Advisory Council on Human Trafficking's 2025 Report has not been published online by the State Department. This council of presidentially-appointed trafficking survivors serves as a resource to federal agencies on ways to strengthen U.S. programs. All previous reports of the council are available online for public view, but the 2025 report, while printed and shared inside the government, is not. It includes important critical observations on the state of U.S. anti-trafficking programs on the occasion of the council's 10th anniversary. Failing to provide easy access to this report for the American public is a reduction in effort by the U.S. government to combat trafficking.
  
- **TIP Report:** For decades, the State Department has gathered diplomats from foreign countries, survivors of human trafficking, members of Congress, religious leaders, journalists and civil society experts from around the world to annual TIP Report launch events. The convenings, typically headlined by the Secretary of State, are more than routine Washington protocol. They underscore the importance of the report's findings to drive improvements in anti-trafficking efforts worldwide, to demonstrate the U.S. government's commitment to combat trafficking and lead the way among nations, and to coalesce whole-of-society partnerships necessary for success. In 2025, however, after missing the statutory deadline to release the report by three months, the department quietly put it online with no launch event and little public notice. The report did not elevate the issue's importance to U.S. diplomacy by providing a formal introduction from Secretary of State Marco Rubio. The annual TIP Heroes Program, which has spotlighted frontline global leaders, many of them survivors, was missing from the report. A section on the impact of trafficking on the LGBTQ+ community was dropped. The report did not mention in its analysis of the United States that there have been significant reductions in anti-trafficking programs at key federal agencies. This context for the report's release undermined U.S. leadership and tarnished the report's reputation and credibility – a reduction in effort by the government to combat trafficking.
  
- **DHS Civic Engagement:** The Department of Homeland Security's quarterly stakeholder briefings for civil society organizations on enforcement of the Uyghur Forced Labor Prevention Act and Tariff Act Withhold Release Order authority ended abruptly in 2025. These quarterly briefings had been valuable opportunities for Forced Labor Enforcement Task Force agencies to hear from nonprofit organizations, and to communicate progress made by the agencies in blocking the importation of goods tainted by forced labor. Ending these briefings is a reduction in effort by the government in combating trafficking. ATEST urges the U.S. Government to prioritize the meaningful resumption and institutionalization of regular civil society engagement.

- **Overemphasis on Immigration and Rollbacks in Protections for Migrants:** There are no reliable statistics on the number of trafficking victims inside the U.S. or the percentage who are migrants, though international [research](#) indicates that 15% of trafficking victims globally are migrants. It is widely documented that migration dramatically increases the risk of trafficking for an individual. During the 2026 TIP Report evaluation period, the U.S. government overemphasized migration as a driver of trafficking, redirected resources away from specialized anti-trafficking units at the Departments of Justice and Homeland Security to focus instead on immigration enforcement, closed the American border to international trafficking victims who are seeking asylum in the U.S., and rolled-back policies that protect guest workers on H visas from traffickers. These actions have increased trafficking risks for migrants while decreasing protection for trafficking victims who aren't.
- **Grant Conditions Eliminate Vulnerable Groups from Trafficking Programs:** The U.S. government has moved to restrict grants to civil society implementers who focus on specific socioeconomic populations that are at heightened risk of human trafficking, including undocumented migrants and LGBTQ+ individuals. This reduces the government's effort to combat trafficking. As well, the U.S. government has moved to restrict funding for civil society grantees who emphasize diversity, equity and inclusion in their programming and operations. This reduces the inclusion of survivors in anti-trafficking projects and the hiring of individuals from racial, gender or religious groups who bring specialized insights and experiences to addressing trafficking in certain communities.
- **Hotline Moved to New Contractor:** The U.S. government has increased funding for the National Human Trafficking Hotline, something ATEST has recommended for many years. However, the Department of Health and Human Services awarded the hotline contract renewal in 2025 to a relatively inexperienced organization, ending a two-decade relationship with the survivor-led NGO that founded the hotline and has operated it successfully. It will be important moving forward to monitor the new contractor's operations to ensure that cases are reported to law enforcement only if the trafficking victim wants that to occur.

Again, our thanks for your diligent efforts to ensure the TIP Report's tier rankings and country narratives include input from civil society. Should you have any questions, please reach out to ATEST Director Terry FitzPatrick: [terry.fitzpatrick@ATEST-US.org](mailto:terry.fitzpatrick@ATEST-US.org) or Cell 571-282-9913.

Sincerely,  
The Alliance to End Slavery and Trafficking