

Re: 2021-15526 Proposed Information Collection Activity; National Human Trafficking Hotline (NHTH) Performance Indicators

To Whom It May Concern:

Thank you for the opportunity to comment on the Proposed Information Collection Activity; National Human Trafficking Hotline (NHTH) Performance Indicators. Polaris has operated the NHTH on behalf of the Department of Health and Human Services (HHS) since its inception in 2007. As a leading anti-trafficking organization and the operator of the NHTH, Polaris is well positioned to evaluate the impact of the proposed information collection activity.

We are deeply committed to providing actionable data to HHS and the larger anti-trafficking field. This commitment has led Polaris to develop the data collection methodology, classification and analysis systems, and data reporting methodology used to report on the NHTH's impact. It has also led Polaris to deploy privately raised resources to establish a data analysis team that provides additional in-depth analysis when possible. For example, over the past year, Polaris has produced three independent reports on the effects of the pandemic on trafficking. Because of this long standing expertise, we are also well versed in the impact of additional data collection on victims and survivors of trafficking as well as the budgetary and staffing implications of additional data collection, analysis and reporting.

Polaris has significant concerns about several aspects of the Proposed Information Collection:

1. The utility of the information requested does not outweigh the negative impact of information collection on victims and survivors contacting the NHTH for help. Additionally, some of the information is not necessary to meet the mandate of the National Human Trafficking Hotline.
2. The agency has underestimated the burden of the proposed collection of information and does not consider the budgetary implications of the annual burden hours or the operational impact of additional information collection on Polaris outside of the NHTH.

Please see the documentation below for in-depth explanations of each concern as well as an itemized list of the data elements referenced in the Proposed Information Collection that pose an issue.

In summary, some of the additional data elements in the proposed information collection are not required to monitor the successful operation of the NHTH, metrics for which are laid out in the cooperative agreement, and the burden of said information collection would impede NHTH operations, to the detriment of the victims and survivors the NHTH is designed to serve.



Additionally, HHS does not provide the requisite budgetary resources to cover the additional costs for the Proposed Information Collection.

The utility of the information requested does not outweigh the negative impact of information collection on victims and survivors contacting the NHTH for help. Additionally, some of the information is not necessary to meet the mandate of the National Human Trafficking Hotline.

The NHTH provides 24/7, yearlong, timely, person-centered, trauma-informed, culturally responsive and linguistically appropriate emergency assistance, information and referrals to potential domestic and foreign, adult and minor, victims of sex and labor trafficking.

The primary purpose of the Hotline is to support victims of sex and labor trafficking. Polaris completes NHTH data collection, clean-up, analysis and reporting in accordance with the existing cooperative agreement. Hotline Advocates (HAs) respond to each signal based on the needs of the person reaching out and only ask questions based on the needs and preferences of the signaler. This is to ensure that the limited time the advocates have to spend with victims and survivors is used most efficiently, and that victims are not asked to unnecessarily share details of their trafficking situations in order to access support, in line with trauma-informed practices. Data collection, clean-up, analysis and reporting should remain a secondary function of the NHTH in order to ensure the best possible support for victims and survivors of trafficking. Additional data fields and frequency of reporting that are not already included in the Cooperative Agreement are not necessary for effective monitoring of performance of the hotline.

For ease and efficiency HAs currently record the majority of the information provided by signalers in narrative form and only use data fields for the areas required by HHS. The Proposed Information Collection would require Polaris to add additional data fields and for Polaris staff to spend valuable time entering information into these fields. Given the extraordinary increase in incoming signal volume, a more than 30-fold increase in signal volume in 2020 as compared to 2008, the first full year Polaris operated the NHTH, Polaris strongly recommends prioritizing HA staff time on working with victims and survivors directly, rather than entering data. Some of the new data requests from the Proposed Information Collection, listed below, are not necessary for connecting victims and survivors with support services and thus, should not be prioritized.

Additionally, as the operator of the NHTH, Polaris is required by the Cooperative Agreement to maintain specific metrics for wait times and missed calls. Added data collection, clean-up, analysis and reporting responsibilities will impede our ability to achieve these metrics, as they were developed with current data responsibilities in mind. We expect that this could have an adverse impact on the experience of signalers contacting the NHTH, including victims and survivors.



The agency has underestimated the burden of the proposed collection of information and does not consider the budgetary implications of the annual burden hours or the operational impact of additional information collection.

Currently, the average amount of staff time spent on calls and texts relating to an individual trafficking situation is 1.5 hours. This is more than twice the estimated average burden hours per response that were predicted in the Proposed Information Collection Activity. Even at 1.5 hours of NHTH staff time, additional time from non-Hotline Polaris staff who are not funded by the HHS Cooperative Agreement would be required for the data collection, clean-up, analysis and reporting proposed in the public notice. Considering that time as well, the total burden is closer to 1,170,600 hours based on the predicted number of respondents/signalers over the remainder of the project period. At this level of additional hours, Polaris would be required to bring on additional HAs to maintain required metrics for missed call rate and wait times as well as additional privately funded data analysts.

Much of the additional data proposed in the Proposed Information Collection Activity is data that is occasionally produced by privately-funded staff as resources allow, and is not required by the recently negotiated Cooperative Agreement. To produce this on a regular basis and include it in regular reporting would require a significant funding increase from HHS to support the establishment of a data analysis team within the structure of the NHTH. Given the current size of the NHTH team, hiring additional staff would also require Polaris to hire additional human resources, finance, technology and Hotline supervisory staff.

Below please find the Proposed Information Collection data elements as submitted, and the Polaris response in an added column on the right labeled "Polaris Comment". We have not commented on all of the Proposed Information Collection data elements, only those that we believe would be overly burdensome, do not serve the primary purpose of the NHTH or would require additional Polaris staff and budget not currently supported by HHS.

Monthly Performance Indicator Report

Human Trafficking Emergency-Related Request and Referral Data

Data Element	Operational Guidance	Polaris Comment
Emergency-Related Service Requests - COVID-19	Record the number of requests made for each emergency-related service during the reporting period.	COVID-19 is an intersectional driver of exploitation. Its effects will not be sufficiently captured through this type of data collection. For this reason, we recommend maintaining the current structure.
New Referral Partners Added to Referral Database	Record the number of new referral partners added to the	Polaris reports on this data element semi-annually and we recommend this continues. If



	referral database during the reporting period.	this cadence increases there will be staffing and cost implications.
Referral Partners in the Referral Database	Record the total number of referral partners in the referral database at the close of the reporting period.	

Human Trafficking Case-Level Data

Data Element	Operational Guidance	Polaris Comment
Total Cases Reported to Law Enforcement	Record the number of potential trafficking cases reported to law enforcement <i>by age of the potential victim(s)</i> during the reporting period.	Polaris reports on the number of potential trafficking cases reported to law enforcement. Information on the age of the victim is produced by Polaris analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.

Semi-Annual Performance Indicator Report

Potential Victim Access, Referral, Report, Outcome Data

Data Element	Operational Guidance	Polaris Comment
Referrals and Reports	Record the number of potential victims who received referrals or were reported to the listed entities during the reporting period.	Polaris reports on similar data elements. Change in data structure would have staffing and budget implications for Polaris beyond the funding of the NHTH.
Type of Outcome Received on Cases of Potential Trafficking	Record the number of potential victims for whom each outcome was logged during the reporting period.	

Potential Victim Demographic Data

Data Element	Operational Guidance	Polaris Comment
Potential Victims Identified by Gender	Record the total number of potential victims during the reporting period by gender.	Demographic information about the victims is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget



		implications for Polaris beyond the funding of the NHTH.
Potential Victims Identified by Citizenship Status	Record the total number of potential victims identified by citizenship status during the reporting period.	Polaris reports on the number of situations involving foreign nationals and U.S. citizens/LPRs, but does not report on citizenship status by victim. Additionally, many victims are not comfortable providing citizenship details. Tracking this information would further impede trust and may not be accurate if callers are afraid. We recommend maintaining the current system of recording and reporting on this information.
Potential Victims Identified by Type of Trafficking	Record the total number of potential victims who experienced each type of trafficking by age during the reporting period.	Age and country of origin of victims is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.
Potential Victims Identified by Country of Origin	Record the total number of potential victims identified during the reporting period from each country.	

Annual Performance Indicator Report

Human Trafficking Emergency-Related Request and Referral Data

Data Element	Operational Guidance	Polaris Comment
Emergency-Related Service Requests - COVID-19	Record the number of requests made for each emergency-related service during the reporting period.	COVID-19 is an intersectional driver of exploitation. Its effects will not be sufficiently captured through this type of data collection. We recommend maintaining the current structure.

Human Trafficking Case-Level Data

Data Element	Operational Guidance	Polaris Comment
Total Cases Reported to Law Enforcement	Record the number of potential trafficking cases reported to law enforcement <i>by age of the potential victim(s)</i> during the reporting period.	Polaris reports on the number of potential trafficking cases reported to law enforcement. Information on the age of the victim is produced by analysis



		outside of the NHTH when resources are available.
Signaler Proximity to Situation or Victim	Record the number of potential trafficking cases where the signalers proximity to the situation/victim was applicable.	Information on proximity of signaler is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.

Potential Trafficker Data

Data Element	Operational Guidance	Polaris Comment
Potential Traffickers Identified	Record the number of potential traffickers identified by the close of the reporting period.	Information on number of potential traffickers and suspicious businesses is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.
Suspicious Businesses Identified	Record the number of suspicious businesses identified by the close of the reporting period.	

Potential Victim Trafficking Experience Data

Data Element	Operational Guidance	Polaris Comment
Risk Factors/Vulnerabilities	Record the total number of potential victims for whom a particular risk factor or vulnerability was logged by the close of the reporting period.	Information on risk factors/vulnerabilities, recruitment tactic, and exploitation venue/industry is produced by analysis outside of the NHTH when resources are available. Requiring this reporting would have staffing and budget implications for Polaris beyond the funding of the NHTH.
Recruitment Tactic	Record the total number of potential victims for whom a particular recruitment tactic was logged by the close of the reporting period.	
Exploitation Venue/Industry	Record the total number of potential victims whose trafficking situation took place in each venue/industry during the reporting period.	