



Re: 2021-27646 Submission for OMB Review; National Human Trafficking Hotline (NHTH) Performance Indicators

To Whom It May Concern:

Thank you for the continued opportunity to comment on the Submission for OMB Review; 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 four 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.

We are appreciative of the changes made thus far during the review process and are eager to support with HHS's data collection needs. However, several aspects of the Submission for OMB Review require data provided for each individual victim identified in a situation of trafficking. Many cases involve multiple victims. This request would require substantial changes to Polaris's data structure which would have significant staffing and budgetary implications.

For the specific data elements referenced below, 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. At this time, HHS does not provide the requisite budgetary resources to cover the additional costs for the Proposed Information Collection.

Please see the documentation below for an in-depth explanation as well as an itemized list of the data elements referenced in the Submission for OMB Review that pose an issue.



**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 personal details or details of their trafficking situations in order to access support, in line with trauma-informed practices. Data collection, enhancement, analysis and reporting should remain a secondary function of the NHTH in order to ensure the best possible support and a timely response for victims and survivors of trafficking.

For 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 Submission for OMB Review would require Polaris to add additional data fields and for Polaris staff to spend valuable time requesting and entering information that may not be necessary to provide services to signalers into these fields. Specifically, recording demographic information about each individual victim referenced on a case will be time consuming, especially on cases where multiple victims are referenced. 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 collecting and entering data.

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.**

Polaris anticipates that the data elements listed below will require an additional 979.5 hours of work per month. This amount of work cannot be absorbed by the existing staff of the hotline. 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 and operations support staff.

Below please find the Submission for OMB Review data elements as submitted, and the Polaris response in two added columns on the right labeled "Polaris Comment" and "Suggested Change". We have not commented on all of the Submission for OMB Review 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 Case-Level Data

Data Element	Operational Guidance	Comment	Suggested Change
Total Cases Reported to Law Enforcement By Age of Potential Victims During Reporting Period	Record the number of potential trafficking cases reported to law enforcement <i>by age of the potential victim(s)</i> during the reporting period.	NHTH operator 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.	Total Cases Reported to Law Enforcement During Reporting Period

## Semi-Annual Performance Indicator Report

### Potential Victim Access, Referral, Report, Outcome Data

Data Element	Operational Guidance	Comment	Suggested Change
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Referrals and Reports	Record the number of potential victims who received referrals or were reported to the listed entities during the reporting period.	NHTH operator reports on similar data elements. Change in data structure would have staffing and budget implications.	Record the number of referrals provided to the listed entities during the reporting period.
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## Potential Victim Demographic Data

Data Element	Operational Guidance	Comment	Suggested Change
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.	Record the total number of cases during the reporting period that involve victims of the following genders: females, males, transgender females, transgender males and gender non-conforming.
Potential Victims Identified by Type of Trafficking by Age	Record the total number of potential victims who experienced each type of trafficking by age during the reporting period.	Age of victims is produced by analysis outside of the NHTH when resources are available.	Record the total number of cases during the reporting period that involve minors. Record the total number of cases during the reporting period that involve adults.

## Annual Performance Indicator Report

### Human Trafficking Case-Level Data

Data Element	Operational Guidance	Comment	Suggested Change
Total Cases Reported to Law Enforcement by age	Record the number of potential trafficking cases reported to law enforcement <i>by age of the potential victim(s)</i>	NHTH operator reports on the number of potential trafficking cases reported to law enforcement. Information on the age	Total Cases Reported to Law Enforcement During Reporting Period



	during the reporting period.	of the victim is produced by analysis outside of the NHTH when resources are available.	
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Thank you for your consideration in this matter.

Sincerely,

Jen Jinks  
Chief Strategy and Impact Officer  
Polaris