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To: InfoCollection (ACF) <infocollection@acf.hhs.gov>

Subject: Trafficking Victim Assistance Program Data Collection

Federal Register Notice Comments on behalf of the U.S. Committee for Refugees and Immigrants (USCRI) who serves as the sole grantee for the TVAP Fiscal Year 2019 grant cycle.

- Health Services Information
 - This information can be very personal and does not appear to be necessary for stewardship of the program. Further, collecting it is inconsistent with trauma-informed care. Specifically, the types of medical services and health screening and names of entities providing services does not appear to be necessary to advance the program goals or support specific outcomes. Concerns include having this information be protected by HIPAA and not reported to the government and fear that such reporting dissuades clients from receiving vital medical care because they do not wish to share this personal information outside of their medical provider. Additional concerns include how this impacts clients' right to consent (and/or refuse, revoke), right to anonymity and privacy, and access to both comprehensive and culturally sensitive case management services for those that may refuse to consent. In addition, the White House Office of Management and Budget's (OMB) prediction that this new data collection would take .25 hours does not match USCRI's experience, which totaled many hours on behalf of both providers and USCRI for each reporting period.
- Types of partnerships developed
 - More information about this proposed data collection and the purpose would be helpful. For example, at a service provider level it would be an undue burden to ask each to track all the community partners they work with. This would be a huge time commitment and would be difficult to track.
- How Information is Collected
 - USCRI recommends continuing with the current system in which TVAP subrecipients report to the lead grantee (USCRI), who then aggregates and submits the data to OTIP. This allows for a form of data quality control and management that would be helpful to OTIP and eliminate a large burden on case managers who are delivering services on the ground.
- Client-level data
 - It is important to ensure that any PII (initials/name, DOB, etc.) can be protected. It is also important to know how the data will be publicly shared and what precautions would be taken to ensure that no combination of filters could be used to identify a survivor.
 - Would need many securities if shared publicly for research.
 - Combination of participant demographic information and location could identify a survivor and put them at risk of endangerment and being re-trafficked— would need to make sure that this would never happen.
- With any additional new data reporting, especially at the client-level, it is important to understand the context in which this would be occurring and the existing concerns across communities. Currently, some communities are experiencing concerns from survivors about the widely- publicized proposed changes to the public charge policy. Survivors are reluctant to apply for public benefits because they believe the new public charge policy will affect their standing to apply for legal residency. Even after assurances that T-visa recipients are supposed to be exempt

from this rule, survivors are still worried that this could change in the future and that they will be unable to receive legal permanent residency if they access any public benefits. Further, USCRI continues to see long processing time for T-Visas. This time frame does not align with the service periods allowed for survivors in the TVAP program. This challenge, coupled with the low rates of Continued Presence issuance across the country, can present additional concerns and vulnerabilities for survivors who are discharging from TVAP and need further support or a safety net to meet their needs and to help set them up for long-term safety and stabilization.

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USCRI Trafficking Victim Assistance Program ([TVAP](#))
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