



Comment on National Human Trafficking Prevention Framework

Submitted via email June 9, 2023

Thank you for the opportunity to comment on the proposed National Human Trafficking Prevention Framework from the U.S. Department of Health and Human Services (HHS). The National Network for Youth is the nation's oldest and largest network of youth service providers and young leaders with lived experiences of homelessness and human trafficking. Together, we advance practical solutions to prevent and improve responses to youth homelessness and human trafficking. This year, at least 4.2 million youth will experience some form of homelessness, with youth of color and two-spirit, lesbian, gay, bisexual, transgender, queer, and questioning youth (2SLGBTQIA) disproportionately experiencing homelessness.¹ Further, 1 in 5 youth experiencing homelessness have been trafficked for sex, labor, or both.²

In 2018, NN4Y released a [white paper](#) on the intersection of youth homelessness and human trafficking. It highlights the high prevalence of trafficking among youth experiencing homelessness, and the primary risk factors they face: poverty, unemployment, sexual abuse history, substance use disorders and mental health challenges. We continue to educate about and advocate for policy solutions to youth homelessness and human trafficking, rooted in the knowledge that ending youth homelessness prevents human trafficking among youth and young adults. Noteworthy examples include our unwavering championing of the Runaway and Homeless Youth Trafficking Prevention Act (RHYTPA), the Homeless Children and Youth Act (HCYA), the Housing for Homeless Students Act, and a myriad of other policy solutions vital to tackling the root causes of youth homelessness, which is key to preventing instances of trafficking among youth in America.

NN4Y applauds HHS for ensuring those with lived experiences were included in the process of drafting this framework and appreciate the opportunity to share our expertise to strengthen the framework. This framework is an important first step in our collective work of preventing human trafficking and improving service delivery to people who have experienced human trafficking. In particular, NN4Y's supports the following proposals in the draft framework and strongly encourage their inclusion in the final version:

¹ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). Missed opportunities: Youth homelessness in America. National estimates. Chicago, IL: Chapin Hall at the University of Chicago.

² Murphy, L. (2017). *Labor and Sex Trafficking Among Homeless Youth: A Ten-City Study Executive Summary*. Available at: <https://www.covenanthouse.org/sites/default/files/inline-files/Loyola%20Multi-City%20Executive%20Summary%20FINAL.pdf>

NN4Y SUPPORTS THE INCLUSION OF THESE STRATEGIES IN THE FINAL PLAN - APPENDIX A

Strategy 1: Strengthen Skills to Promote Self-Efficacy and Prevent Human Trafficking

- “Fund, develop, and/or implement targeted prevention education with children and youth in high-risk settings (e.g., foster care programs, group homes, detention facilities, substance use treatment centers, shelters) or community programs (e.g., places of worship, community centers, ESL programs).”
- “Integrate universal prevention education into elementary, middle, high school, and college curricula.”
- “Mandate prevention education in specific settings or programs (e.g., schools, workplace) or with specific populations (e.g., children and youth in the child welfare or juvenile justice systems, unaccompanied children, temporary nonimmigrant worker visa holders, foreign national workers).”

Strategy 2: Identify and Support People Who Have Experienced or are At-Risk of Experiencing Human Trafficking to Increase Safety and Reduce Harm

- “Develop and/or implement policies and procedures that require universal screening for children, youth, and adults in high-risk settings (e.g., homeless shelters, child welfare, criminal justice) or circumstances (natural disasters, migration, and/or service transitions or disruptions).”
- “Establish restorative justice approaches that focus on rehabilitation, education, and employment and training opportunities for youth who become involved with the justice system.”

Strategy 3: Strengthen Economic Supports

- “Develop, implement, and/or fund peer mentorship programs for individuals and families in transition from system involvement (e.g., child welfare, juvenile justice, criminal justice).”
- “Invest in and create opportunities for skills development and professional growth for individuals with lived experience.”

Strategy 4: Promote Family Environments That Support Healthy Development

NN4Y is in strong support of all bullets in this section.

Strategy 6: Create Protective Environments

- “Develop, implement, and/or fund school policies and programs designed to enhance safety and well-being.”

Strategy 8: Promote Social Norms That Protect Against Violence

- “Develop, implement, and/or fund programs that engage allies, model positive masculinity, normalize help seeking behavior, and promote social and peer-group norms that encourage non-violent behavior and peer support.”
- “Develop, implement, and/or fund public awareness and outreach activities that promote protective social norms and behaviors that contribute to safety and well-being, including gender and racial equity.”

NN4Y STRONGLY RECOMMENDS ADDING THESE STRATEGIES TO THE FINAL PLAN - APPENDIX A

While the framework recognizes housing instability, including a history of running away or experiencing homelessness during youth, as a significant risk factor for human trafficking victimization, it should go further. HHS should extend its focus even further by prioritizing the eradication of youth homelessness, as well as early outreach and crisis intervention for youth who run away, as two crucial measures to prevent human trafficking. These two strategies are critical to more effectively address the root causes and vulnerable circumstances that increase the likelihood that youth in America will be trafficked by preventing their victimization in the first place. Additionally, by focusing on youth and young adults, it is possible to disrupt and heal ongoing cycles of trauma.

Further, all stakeholders should ensure that the activities outlined in Appendix A of the framework are carried out with a focus on reaching and serving those who most often experience homelessness and trafficking, including 2SLGBTQIA young people, youth of color, young people who have survived abuse, system-involved youth, and those who haven’t graduated from high school.

As you finalize this framework, NN4Y urges you to consider the following changes to strengthen the framework further:

Strategy 2: Identify and Support People Who Have Experienced or are At-Risk of Experiencing Human Trafficking to Increase Safety and Reduce Harm

NN4Y recommends adding the following bullet point to Strategy 2:

- “Fund research to gather more data about the prevalence of human trafficking amongst youth and young adults experiencing homelessness.”

To effectively develop and implement evidence-based solutions to prevent human trafficking, it is crucial to obtain up-to-date data on the issue, particularly disaggregated demographic information about survivors of human trafficking and what led to their victimization, in their own words.

Strategy 3: Strengthen Economic Supports

In the bullet point below, NN4Y recommends inserting “including youth and young adults,” after applicants:

- “Develop pathways to ensure eligible applicants, including youth and young adults, can access benefits and services designed to enhance economic stability.”

Young people face unique barriers in trying to access the public benefits and services they need, such as parental signature requirements for minors, birth certificates and valid government ID requirements. Young people need targeted and enhanced support to achieve economic stability.

NN4Y recommends adding the following bullet points to Strategy 3: Strengthen Economic Supports

- “Strengthen existing youth homelessness shelter and housing programs, such as those funded by the Runaway and Homeless Youth Act to more effectively identify, protect, and respond to the unique needs of survivors of human trafficking and prevent the trafficking of youth in their programs.”

For over 45 years, the federal Runaway and Homeless Youth Act program has been providing effective short- and long- term housing options for youth who run away, youth experiencing homelessness, and youth survivors of human trafficking. This work should be bolstered through significantly increased investment (via President’s budget requests), expanded so that the network of over 500 youth-serving programs have the capacity to serve more youth, and used as a model for the broader trafficking service provider movement.

- “Develop and implement parenting support for survivors of trafficking with children.”

Parents exiting trafficking situations face unique challenges in their climb to independence and upward socioeconomic mobility, because of the time and expense of parenting and child care. These families need elevated support as they navigate their way to safety, health, and self-sufficiency, together.

Strategy 4: Promote Family Environments That Support Healthy Development

NN4Y recommends adding the following bullet point to Strategy 4: Promote Family Environments That Support Healthy Development

- “Develop, implement, and/or fund family-based interventions to repair relationships between youth in crisis and their parents and/or other relatives (when safe and desired by youth)”

By facilitating the reconnection of youth in crisis with their families when safe and appropriate, we can foster healthy relationships with caring adults, thereby mitigating the risk factors that make them more susceptible to trafficking.

Strategy 6: Create Protective Environments

NN4Y recommends adding the following bullet point to Strategy 6: Create Protective Environments

- “Identify, develop, and implement strategies to ensure that law enforcement and justice responses protect rather than punish youth who are trying to stay safe and meet basic needs.”

To truly create protective environments for all people, especially youth and young adults, it is critical that we focus on restorative and rehabilitative efforts rather than punitive measures. Youth should not be criminalized (arrested, detained, etc.) for survival acts, instead, they should be connected to the services they need to decrease the likelihood that they will become victims of trafficking.

In the bullet point below, NN4Y recommends adding the second sentence:

- “Identify, develop, and/or implement strategies to engage students, particularly those with increased risk factors, in school activities. For high school students with increased risk factors, implement education supports to help them graduate high school despite instability at home.”

Studies have shown that young people who have not graduated from high school are more likely to experience homelessness and trafficking. It is important to add specificity on ensuring this age group has the support they need to graduate high school.

We look forward to actively supporting this framework’s implementation and impact. Thank you for your consideration.

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