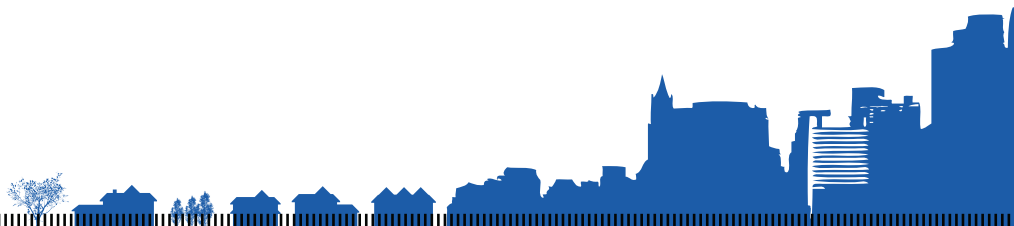


Housing Needs of Survivors of Human Trafficking Study



PD&R



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Executive Summary

The Violence Against Women Act (VAWA) of 2022 tasked the Department of Housing and Urban Development (HUD) with conducting a study assessing the availability and accessibility of housing and services for individuals experiencing homelessness or housing instability who are survivors of human trafficking or at risk of being trafficked. “Survivors of trafficking,” as referenced in this study, refer to people who are victims of crimes involving the exploitation of a person for labor, services, or commercial sex (DOJ, n.d.). This study primarily uses the term “survivor” except in certain circumstances, including when quoting research or describing policies or data that use the term “victim.” Policymakers have an extensive body of research on the causes and conditions of housing insecurity and homelessness nationally. Similarly, there is a growing body of research on the service needs of survivors of human trafficking and the variety of program models providing support in a trauma-informed, survivor-centered way. However, the specific housing and service needs of survivors of trafficking who experience homelessness and deep housing insecurity is a comparatively underexplored topic.

HUD’s core rental assistance programs help foster stability, affordability, and choice for nearly ten million households, but these programs reach fewer than one in four who are eligible (Poethig, 2014). HUD’s homeless assistance programs similarly provide critical shelter, temporary assistance, and permanent housing in communities around the country, but many programs are oversubscribed, contributing to growing numbers of people experiencing unsheltered homelessness. We know that access to those housing resources can protect against housing instability and homelessness, which increase the risk of a person being trafficked, and that having housing stability helps survivors from being in environments that could lead to revictimization (Warren, Drazen, and Curtis, 2017; Williams and Gwam, 2021).

Congress tasked HUD with assessing several issues related to the kinds of services and housing options available and accessible to survivors. Using contributions from a wide range of stakeholders and research literature, this study presents an overview of methods of conducting outreach to survivors and assessing their needs; available resources for housing and services; policies and procedures that shape access to mainstream housing and services; barriers to fair housing; and best practices in housing and service delivery.

The Federal Bureau of Investigation (FBI) collects data on human trafficking from local, state, and federal law enforcement agencies through its Uniform Crime Reporting (UCR) program. The FBI reported 2,023 incidents of human trafficking in 2020—of which 84 percent were for sex trafficking and 16 percent for labor trafficking—but Department of Justice (DOJ) research suggests this is only a small portion of trafficking cases (CRS, 2022; National Institute of Justice, 2020). The most comprehensive available data source on the experience of human trafficking in the United States comes from the National Human Trafficking Hotline (Trafficking Hotline), which received reports of 10,359 trafficking situations in 2021 and identified 16,554 possible victims. Although Trafficking Hotline data still more accurately reflect cases reported to authorities and people who were aware of the hotline than true prevalence rates, these data do contain some cases in which the potential victims did not want to report to law enforcement. In these data, more sex trafficking cases than labor trafficking cases were reported to the hotline. Of cases reported to the hotline, 76 percent involved sex or sex and labor, and only 10 percent of reported cases were labor trafficking alone. Of the cases reported to the Trafficking Hotline, most survivors were women who had been victims of sex trafficking; however, men made up the largest share of survivors of labor trafficking. Data from the Trafficking Hotline and other research suggest that certain

groups, including noncitizens, African- American, Hispanic/Latino, and LGBTQIA+ youth survivors, are disproportionately represented. However, the available evidence suggests there is considerable undercounting of certain trafficking situations and a high degree of uncertainty about the characteristics of trafficking survivors nationally (Dank, 2021; Ferrel, 2019).

The principal finding of this study is that, although many program models and approaches to service provisions exist that are well suited to addressing the housing needs of survivors of trafficking, they are typically not scaled to meet the need. Beyond increased resources and increased training, technical assistance is needed to better coordinate across often siloed housing and service providers and to better integrate trafficking-focused providers into the mainstream housing and homelessness systems.

Methods of conducting outreach to survivors and assessing their needs. Trafficking survivors are too often invisible to service providers, even those service providers working in often intersecting fields, such as domestic violence or sexual assault. Despite survivors frequently coming in contact with medical providers and law enforcement, analyses show those institutions only identify a small portion of trafficking cases (National Institute of Justice, 2020; Hainaut, Thompson, and Ades, 2022). Identifying survivors can be difficult for a host of different reasons, including fear of retaliation by their traffickers, interaction with law enforcement or immigration officials, or even judgment from people or systems that are meant to provide support. Being able to better identify survivors and understand their housing and service needs requires building trust and is a critical starting point for improvements to the housing and services system. Outreach processes are inherently complex given the hidden nature of trafficking, with some important progress needed on reaching out to and identifying survivors to connect them with services, engaging siloed housing and service providers, coordinating service delivery, and building capacity of the systems and service providers who are working with survivors already. This report discusses validated assessment tools for transitional age youth (aged 16–25) and minors and general protocols that could be used in other service and housing settings; however, there is no one-size-fits-all method. Collaboration with culturally and community-specific partners is a critical approach for providers to both reach and engage with survivors—particularly those with intersectional experiences and identities, including people of color, those with limited English proficiency, LGBTQIA+ individuals, and people with disabilities. Across the board, policymakers and service providers must address how engaging with these outreach and assessment processes can be complex, burdensome, and retraumatizing for survivors.

Availability of resources for housing and services. A wide variety of housing resources meant for survivors exists, but the primary constraint of both specialized resources available to certain target groups and housing assistance generally—as well as specialized resources available to certain groups—is that there are not enough resources to serve everyone who could benefit. Whether survivors can access these resources is influenced by the type of housing assistance or shelter available, the provider and their reputation in the community, the duration of the assistance, the intensity of services, where the resources are offered, and where the resources can be used. These differences often mean that certain types of assistance are better suited to different survivors’ needs or are best able to support survivors at different times—for example, addressing an immediate crisis versus promoting ongoing housing stability.

Access to mainstream housing and services. The policies and procedures guiding how different housing programs operate play a major role in whether and how survivors can access support. Getting access to the appropriate mix of housing and services in the first place presents a major challenge to survivors

who often must navigate complex, siloed programs that do not work together in a coordinated way. In addition, programs that rely on private market housing can present a challenge to survivors, who often struggle to find landlords willing to rent to them because of documentation requirements, criminal records, credit issues, poor rental history, or immigration status.

Barriers to fair housing. Beyond procedural barriers to certain kinds of housing assistance, survivors often face unique barriers to fair housing. The survivor community is disproportionately made up of groups that face systematic discrimination based on their race, color, national origin (including those with limited English proficiency), sex (including sexual orientation and gender identity), familial status, and other protected characteristics. Survivors may also experience discrimination based on factors that are proxies for discrimination on a protected class basis, such as immigration status, language, and ethnicity. Survivors can also be targets for exploitative behavior in housing in a way that preys on their personal trauma—because of a fear of losing housing, experiencing housing instability, revictimization, or having to engage with the criminal justice system or immigration enforcement.

Best practices in housing and service delivery. Even with these real, systematic challenges to accessing appropriate housing resources, service providers around the country are operating successful program models for survivors. The most promising programs share a consistent approach: a commitment to trauma-informed, survivor-centered service delivery that values the autonomy and choice of survivors. This approach is best reflected in the growth of programs targeting trafficking survivors that use a flexible financial assistance model or offer a continuum of housing options as well as provide for wraparound supportive services tailored to each survivor’s needs and circumstances.

The findings in this report are intended to inform an ongoing discussion involving policymakers, advocates, service providers, and people with lived experience. Although developing a full set of recommendations will require more research, discussion, and stakeholder engagement, the findings of this report suggest several potential ways to improve availability and access to housing and services for survivors:

- More support to foster collaboration and streamlining across systems, such as tools, training, and convenings on interagency cooperation, leveraging resources, and navigating policies and procedures.
- Increased trafficking survivor-specific housing resources, particularly to increase access to long-term housing assistance and wraparound services when needed.
- Investment in flexible funding sources, either through considering how major funding sources could be made more flexible or through increasing funding for the programs that currently have the most flexibility.
- More meaningful engagement, partnership, and funding to directly support culturally specific and community-based organizations.
- Greater focus on making practical changes to housing assistance applications, eligibility, screening, and intake processes, including with the use of technology, to reduce the traumatizing effects of navigating siloed systems.
- More inclusion and elevation of people with lived expertise in substantive areas of program design, policymaking, and leadership.
- Increased emphasis on trauma-informed, survivor-centered service provision approaches within existing housing and homeless assistance providers.
- Provide education and training targeted to service providers and housing program staff on survivors’ rights and housing barriers, including housing protections under the Violence Against

Women Act and related laws, how to address issues related to criminal records or bad or no credit histories, landlord engagement methods, and the rights of noncitizens and survivors with trafficking-specific immigration statuses and undocumented survivors.

Survivors have diverse backgrounds and experiences; therefore, individual paths toward healing can vary considerably. Given this heterogeneity, policymakers looking to employ these promising program models should seek out the perspectives of survivors of labor and sex trafficking and meaningfully integrate their contributions into program design. Survivors' perspectives are especially vital to understanding the unique needs and experiences of key groups that are overrepresented among survivors, namely: youth and young adults, including those with involvement in the child welfare and juvenile justice system; LGBTQIA+ individuals and youth, in particular; noncitizens and survivors with certain immigration statuses; and African-American and American-Indian/Alaska Native survivors. At the core of these varied experiences is a basic reality: safe and affordable housing helps prevent people at risk of trafficking from experiencing the kind of instability that can increase the risk of victimization, fosters stability that can prevent survivors from being re-victimized, and, ultimately, supports survivors on their complex journeys to healing.

Introduction

The Violence Against Women Act (VAWA), first passed in 1994 and most recently reauthorized in 2022, encompasses a range of federal responses to the issues of domestic violence, dating violence, sexual assault, and stalking. VAWA established sentencing standards, victim compensation, and rights for survivors in federal programs alongside grants to state, local, and tribal entities. Survivors of human trafficking were first expressly included in VAWA 2013, which amended and authorized appropriations for the Trafficking Victims Protection Act of 2000. VAWA 2013 enhanced measures to combat trafficking in persons and amended the purpose areas for several grants to address sex trafficking administered by the Office for Violence Against Women (OVW) at DOJ. VAWA 2013 also clarified that victim services and legal assistance include services and assistance to victims of domestic violence, dating violence, sexual assault, or stalking who are also victims of severe forms of trafficking in persons (Sacco and Hanson, 2019). VAWA's 2022 reauthorization (VAWA 2022) required HUD to study and report on housing and service needs of survivors of human trafficking and individuals at risk for trafficking. HUD's Office of Policy Development and Research and the Office of the Secretary's Director on Gender-based Violence Prevention and Equity launched the study in the spring of 2022.

Title VI, the Housing Rights Chapter of VAWA, includes critical housing protections for survivors in HUD-assisted housing, including protections against discrimination at admission, eviction protections, and rights to maintain housing assistance either through an emergency transfer or remaining in their homes (HUD, n.d.). Section 606 of VAWA 2022 sets out the parameters of this *Housing Needs of Survivors of Human Trafficking Study*. The principal goal of this research is to "assess the availability and accessibility of housing and services for individuals experiencing homelessness or housing instability who are survivors of human trafficking or at risk of being trafficked." The statute directed HUD to actively coordinate with a set of federal partners in

the Interagency Task Force to Monitor and Combat Trafficking, in particular, member offices of the Department of Health and Human Services (HHS) and DOJ. To support a broad and inclusive set of partners in the study process, the statute required HUD to consult with survivors of human trafficking and direct service providers, including organizations that work with runaway and homeless youth, provide services for survivors in community-based programs, provide housing for survivors, and provide homeless assistance.

This *Housing Needs of Survivors of Human Trafficking Study* seeks to address the following research questions:

- What formal assessments and outreach methods are used to identify and assess the housing and service needs of survivors of trafficking, including severe forms of trafficking, and those at risk of being trafficked? What are effective ways to communicate with people with disabilities or limited English proficiency?

VAWA Title VI, Sec. 606

(Pub. L. No. 117-103, 136 Stat. 49, 887)

(1) IN GENERAL. —The Secretary of Housing and Urban Development shall conduct a study assessing the availability and accessibility of housing and services for individuals experiencing homelessness or housing instability who are—

(A) survivors of trafficking, including survivors of a severe form of trafficking; or

(B) at risk of being trafficked.

- What homeless or housing services are available and accessible to survivors of trafficking, including severe forms of trafficking, and those at risk of being trafficked? What is available and accessible for family members of minors involved in the foster care system or for people with disabilities and a need for accessibility features?
- What policies and procedures of mainstream homelessness or housing services facilitate or limit the availability of such services to survivors of trafficking, including severe forms of trafficking, and those at risk of being trafficked? What policies impact people who are involved in the legal system?
- What are best practices in meeting the housing and service needs of survivors of trafficking, including severe forms of trafficking, and those at risk of being trafficked?
- What are the barriers to fair housing and is there housing discrimination against survivors of trafficking who are members of a protected class under the Fair Housing Act?
- Are mainstream homelessness or housing services able to meet specialized needs of survivors of trafficking, including severe forms of trafficking, and those at risk of being trafficked?
- What are the effectiveness of and infrastructure considerations for housing and service-delivery models specific to survivors of trafficking?

To address these research questions, the study team conducted an exploratory assessment of the issue, collaboratively driven by an extensive network of stakeholders. The study team compiled a review of the available literature, drawing on academic research, data collection efforts, program evaluations, and relevant policy research. Using the federal partners specified in the text of Section 606 as a guide and starting point, the study team conducted a series of listening sessions with partners in federal, state, and local government as well as stakeholders with backgrounds in research, policy, advocacy, direct service, and personal lived experience with human trafficking.

The listening sessions that make up the core of this study were intentionally participant-driven, meaning the study team relied on stakeholder feedback to guide open discussions of the housing needs of survivors of trafficking. Listening sessions were intentionally kept as open as possible; the study team shared the text of Section 606 and presented a high-level overview of the study's goals. Listening sessions then largely relied on participants and the organizations present to drive a collaborative discussion. This approach allowed each stakeholder listening session to contribute to the study team's knowledge of a content area, provide context around the core study questions, offer possible resources to include in the literature review, and identify other groups for future listening sessions. The study team conducted a total of 23 listening sessions engaging a wide array of stakeholders, including expert panelists with lived experience and direct service providers from across the country. The perspectives of people with lived experience with sex and labor trafficking were especially important to this research because it allowed the study team to learn from their unique expertise and validate information gathered from other sources.

HUD is well situated to conduct this study because the questions in Section 606 focus on assessing housing needs, function, and availability of housing resources generally and because of the lessons learned from the implementation of different housing models. Still, no one federal agency has sole ownership of the services and housing resources accessed by survivors of trafficking, and the study team is grateful for the shared expertise of all stakeholders who contributed to this report—specifically, the U.S. Advisory Council on Human Trafficking, the Federal Human Trafficking Housing Working Group, the Interagency Task Force to Monitor and Combat Trafficking, and federal partners across the DOJ and HHS. Special thanks to Freedom Network USA, the National Survivor Network, the Polaris Project,

Covenant House, Chris Bates, Ron Kalemba, Rosette Nsonga, Bakari Roscoe, Chris Victoria, and all the other survivors and direct service providers who shared their time, stories, and expertise.

Key Definitions

VAWA Housing Rights

(34 U.S.C. § 12491-12496)*

VAWA's housing protections apply to survivors of domestic violence, dating violence, sexual assault, and stalking (VAWA abuse/violence) who are applying for or living in HUD-subsidized or assisted housing and other federally subsidized housing programs. Some of VAWA's housing protections for survivors include:

- Protection against admission or assistance discrimination, assistance termination, and eviction based on their experience with VAWA abuse/violence;
- Protection against termination based on criminal activity directly relating to VAWA abuse/violence;
- The right to request an emergency transfer for safety reasons related to the VAWA abuse/violence;
- The right to request a lease bifurcation to remove a perpetrator from the lease or unit;
- The right to confidentiality; and
- Anti-retaliation and anti-coercion requirements that prohibit covered housing providers from discrimination against any person exercising VAWA rights.

For more information on VAWA's housing protections, see www.hud.gov/vawa.

*HUD's VAWA implementing regulations are codified at 24 CFR part 5, subpart L, and in program-specific regulations at 24 CFR Parts 91, 92, 93, 200, 247, 574, 576, 578, 880, 882, 883, 884, 886, 891, 906, 960, 966, 982, and 983.

Discussion of survivors, people experiencing homelessness, and the varying circumstances associated with the risk of either victimization or deep housing insecurity requires a clear set of definitions.

Human Trafficking

"Survivors of trafficking," as referenced in this report, refers to people who are victims of crimes involving the exploitation of a person for labor, services, or commercial sex (DOJ, n.d.). The Trafficking Victims Protection Act (TVPA) of 2000 and its subsequent reauthorizations recognize and define two primary forms of human trafficking:

- **Sex trafficking** is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age. (22 U.S.C. § 7102(11)(A)).
- **Forced labor** is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. (22 U.S.C. § 7102(11)(B)).

Survivor-Centered Language

Many federal, state, and local governments use the term "victim" in key pieces of legislation, policy guidance, research, and other public-facing documents when referring to people who have been

trafficked. The term “victim” has legal implications within the criminal justice process and generally means an individual who suffered harm as a result of the commission of a crime. “Victims” also have particular rights within the criminal justice process. However, in keeping with the approach taken by the U.S. Advisory Council on Human Trafficking and the consensus of the stakeholders who contributed to this study, this report primarily uses the term “survivor” as a way to recognize the strength it takes to continue on a journey toward healing in the aftermath of a traumatic experience (President’s Interagency Task Force to Monitor and Combat Trafficking in Persons, 2014: 8). The report limits use of the term “victim” to references to specific programs or data points that use that terminology. This background section in particular frequently uses “victim” because the relevant agencies do so in reporting and because the data being collected are on either individual cases, which have a victim and a perpetrator, or are referencing people during a trafficking experience as they are being victimized.

Homelessness

The CoC program definition of homeless at 24 CFR 578.3 includes the following four “homeless” categories. Categories 1 through 3 are based on section 103(a) of the McKinney-Vento Homeless Assistance Act, whereas Category 4 is based on section 103(b) of that Act.¹

1. Category 1: Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or (iii) Is exiting an institution where the individual or family resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
2. Category 2: Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.
3. Category 3: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless

¹ For purposes of programs such as the Emergency Solutions Grants and Continuum of Care Programs, section 605 of the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022) amended section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider as homeless “any individual or family who— (1) is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; (2) has no other safe residence; and (3) lacks the resources to obtain other safe permanent housing.”

assistance; and (iv) Can be expected to continue in such status for an extended period of time due to certain special needs or barriers.

4. Category 4: Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing.

HUD considers survivors of human trafficking who present for homeless assistance to fall squarely within the conditions described in criterion (i) of category 4 above.

At Risk of Homelessness

HUD's definition of "at-risk of homeless" 24 CFR 578.3 includes the following categories.

1. An individual or family who: (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and (iii) Meets one of the following conditions:
 - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
 - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a\(3\)](#)), section 637(11) of the Head Start Act ([42 U.S.C. 9832\(11\)](#)), section 41403(6) of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2\(6\)](#)), section 330(h)(5)(A) of the Public Health Service Act ([42 U.S.C. 254b\(h\)\(5\)\(A\)](#)), section 3(m) of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012\(m\)](#)), or section 17(b)(15) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)\(15\)](#)); or

3. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a\(2\)](#)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Incidence of Trafficking, Homelessness, and Housing Insecurity

This section discusses the available data on the incidence of human trafficking, homelessness, and housing insecurity and the intersections among them. The data provide an important baseline for understanding future sections, but some large data gaps make it difficult to speak with certainty about the number and characteristics of trafficking survivors and the extent to which they experience housing precarity. Both homelessness and human trafficking can be episodic in nature, and people will largely remain invisible unless they either actively seek help or are otherwise identified by an entity conducting outreach or screening. The question of when and how people become visible to systems is especially difficult when it comes to trafficking survivors for many reasons, including presence of traffickers, the pressure to hide illegal activity, fear associated with coming forward, systemic barriers, stigma by systems, and lack of awareness and education.

Human Trafficking

Data on human trafficking in the United States come from two main sources: 1) administrative data—such as records of prosecutions, investigations, and service delivery engagements—collected by or for federal agencies and 2) tracking data from service providers seeking to measure their outreach, engagement, and/or service delivery activities.

According to the Department of State’s *2022 Trafficking in Persons Report*, in fiscal year (FY) 2021, Department of Homeland Security (DHS) forensic interview specialists conducted 542 trafficking-focused interviews using a trauma-informed approach, and DHS victim assistance specialists assisted 728 victims of human trafficking. In addition, DOJ forensic interview specialists conducted 202 human trafficking forensic interviews of victims, and DOJ’s 172 victim specialists provided services to human trafficking victims in 708 cases (U.S. Department of State, 2022).

The FY 2021 *Annual Report* from the Office of Trafficking in Persons (OTIP) in the Administration for Children and Families (ACF) at HHS shows that grant-funded organizations in more than 200 cities and 41 states provided comprehensive case management services to 4,293 individuals in FY 2021, a 33-percent increase from FY 2020 (ACF, 2021). OTIP issues “Certification Letters” to adults and “Eligibility Letters” to minor children who are noncitizens and have experienced human trafficking, making them eligible to receive benefits and services to the same extent as refugees as authorized by the TVPA. In FY 2021, OTIP issued 527 Certification Letters to noncitizen adults, of which 357 (68 percent) were related to labor trafficking and 74 (14 percent) were related to sex trafficking. OTIP also issued 1,143 Eligibility Letters to minors, of which 787 (69 percent) were related to labor trafficking, 287 (25 percent) were related to sex trafficking, and 69 (6 percent) were related to both labor and sex trafficking.

The Department of State’s *2023 Trafficking in Persons Report* indicated that a subset of anti-trafficking grantees funded by the Office for Victims of Crime (OVC) at DOJ reported 16,390 open trafficking client cases from July 1, 2021, to June 30, 2022, of which 5,418 were new clients. OVC’s grantees reported 63 percent of clients served were U.S. citizens or lawful permanent residents, 31 percent were noncitizens, and the status of 6 percent was unknown. Grantees reported that 62 percent of clients served were victims of sex trafficking, 21 percent were victims of labor trafficking, 8 percent were identified as

victims of both sex and labor trafficking, and the form of trafficking for 9 percent was unspecified (U.S. Department of State, 2023).

The nonprofit Polaris Project operates the U.S. National Human Trafficking Hotline (Trafficking Hotline) with funding from OTIP, which provides victims and survivors of sex and labor trafficking with vital support and options to get help and stay safe. The Trafficking Hotline offers phone, text, and web-based outreach options, and staff can connect callers with emergency shelter, transportation, trauma counselors, local law enforcement, or a range of other services and support. Between January 1, 2021, and December 31, 2021, the Trafficking Hotline received reports of 10,359 potential trafficking situations involving 16,554 likely victims of trafficking (Polaris Project, 2021b). The Trafficking Hotline has handled 82,301 reports of potential human trafficking since Polaris Project began operating it in 2007. Those reports comprise the largest known data set on human trafficking in the United States.

Data Gaps

Fundamentally, data on the incidence and prevalence of human trafficking in the United States are limited and difficult to capture. Traffickers are engaged in criminal activity and often go to great lengths to hide what they are doing. People actively being trafficked are often justifiably fearful of coming forward for any number of reasons: their trafficking situations can involve illegal activities, such as commercial sex or drug sales; they may be undocumented or fearful of deportation; they may worry about judgment or exploitative behavior from people to whom they reveal their survivor status; they may fear or have experienced arrest or mistreatment at the hands of law enforcement or other government actors; or they may fear retaliation by their trafficker or other members of their community. In addition, in multiple listening sessions with organizations working in direct service provision, providers noted that it is not uncommon for survivors to not know or understand that their experience constitutes trafficking.

The FBI collects data on human trafficking from local, state, and federal law enforcement agencies through its Uniform Crime Reporting (UCR) program. Using data from 48 states and Puerto Rico, the FBI reported 2,023 incidents of human trafficking in 2020; 83.7 percent were for sex trafficking and 16.3 percent were for labor trafficking (CRS, 2022). Research funded by DOJ suggests that labor and sex trafficking data appearing in the FBI's UCR Program may significantly understate the extent of human trafficking crimes in the United States (National Institute of Justice, 2020). Other sources of data relying on law enforcement actions, investigations, or other kinds of certification by an official body can be limited by a variety of factor, including the availability of resources to conduct investigations, a generally limited understanding of what constitutes trafficking among the entities that might make referrals, or a reluctance among survivors to report their situations to authorities. When looking specifically at law enforcement, DOJ researchers documented a widespread inability of officers to identify local trafficking offenses coupled with inadequate reporting of those offenses that were identified. Similar deficiencies are likely present to some degree in other places where survivors can be identified, including medical settings or direct service providers, which may lack specific expertise on the often-overlapping issues of domestic violence (DV), sexual assault (SA), intimate partner violence (IPV), or gender-based violence (GBV). The study also noted that identification of labor trafficking survivors was particularly difficult and that many service providers do not assess for labor trafficking at all.

Sources such as the National Human Trafficking Hotline or tracking data on service use by survivors rely on self-reporting by phone, online, or even in person. Survivors who do not know the number to call or a place to go or who are not ready to report are not included. The scope of this underreporting and

inability to identify survivors is not fully known; however, some analyses suggest that the undercount could be substantial. Multiple community-based surveys of runaway and homeless youth have documented high rates of trafficking experiences. A ten-site survey of 641 homeless and runaway youth between the ages of 17 and 25 found that 19 percent were identified as survivors of some form of human trafficking (Murphy, 2016). Another study of 564 runaway and homeless youth aged 14 to 25 in the metro-Atlanta area found that 40 percent experienced some form of trafficking while homeless. One analysis from DOJ looking at two large jurisdictions in the West and Northeast concluded that law enforcement was engaging with 14 to 18 percent of trafficking cases and properly identifying people as trafficking victims in 2.5 to 6 percent of cases, though the same analysis estimated that 29 to 45 percent of the minor sex trafficking victimization population is captured by either law enforcement or other community service providers (Farrell, et al., 2019). DOJ-funded studies of agricultural workers indicate that as many as 18 to 30 percent of migrant workers have experienced labor trafficking in the United States, and identifying labor trafficking incidents distinct from other exploitative or abusive labor practices is a recurring challenge (Zhang, et al., 2014; Zhang, et al., 2019; Dank, et al., 2021).

Types of Trafficking

With the important caveat about the inherent difficulties associated with collecting data on trafficking, it is important to use all available sources to help understand who trafficking survivors are and what their experiences have been. In the United States, sex trafficking and instances in which sex and labor trafficking coincide constitute the majority of reported cases. However, feedback from service providers emphasizes that survivor experiences are intersectional, and often survivors will not neatly fall into categories. In addition, other analyses suggest that cases of labor trafficking are a particular blind spot for many service and law enforcement entities, stemming from significant underreporting and misidentification (National Institute of Justice, 2020). Therefore, it is important to be mindful of the limitation of these categories and that a survivor's placement in a given category should not indicate what their needs will be or dictate the services they receive.

Exhibit 1 shows summary data from the most recent annual report on data from the Trafficking Hotline and demonstrates that most survivors who contact the hotline are women who had been victims of sex trafficking; however, men make up the largest share of survivors of labor trafficking reports in available data. A Polaris Project report, *The Typology of Modern Slavery*, contains a comprehensive breakdown of the most common situations in which trafficking has taken place, as identified by the Trafficking Hotline. Cases classified as sex trafficking alone in these data involve commercial sex, including escort services or street prostitution; sex and labor trafficking together commonly involves illicit massage or other health settings; and labor trafficking is somewhat more varied, with prevalence in domestic work and industries including agriculture or restaurants.

Exhibit 1. Data from the National Human Trafficking Hotline—Individuals in Potential Trafficking Situations

Trafficking in 2021	Female	Male	Another Gender Identity	Unknown	Total
Sex	8,397 (79%)	699 (7%)	107 (1%)	1,368 (13%)	10,571
Labor	844 (22%)	1,814 (48%)	9 (0%)	1,118 (30%)	3,785
Sex + Labor	454 (64%)	103 (15%)	4 (0%)	146 (21%)	707

Trafficking in 2021	Female	Male	Another Gender Identity	Unknown	Total
Other/Not Specified	1,016 (67%)	134 (9%)	17 (1%)	348 (23%)	1,515
Total	10,690	2,747	137	2,980	16,554

Source: [Polaris Project, 2021](#)

Survivor Demographics

Survivors who are White appear to be underrepresented relative to their share of the population, and survivors of color, particularly African-American and Hispanic/Latino survivors, appear to be overrepresented (Bureau of Justice Statistics, 2011).² The Trafficking Hotline tracks whether survivors are adults or minors when they contact Polaris; 59 percent are adults, 23 percent minors, and 19 percent unknown.³ National law enforcement and Trafficking Hotline data sources do not report on the sexuality and gender identity of survivors. However, the consensus among stakeholders and the balance of the literature is that the LGBTQIA+ community is disproportionately overrepresented among survivors, particularly LGBTQIA+ youth. Loyola University's ten-city study of runaway and homeless youth found that LGBTQIA+ youth accounted for 19 percent of the respondents, but they accounted for 36 percent of the respondents who were survivors of sex trafficking (Murphy, 2016).

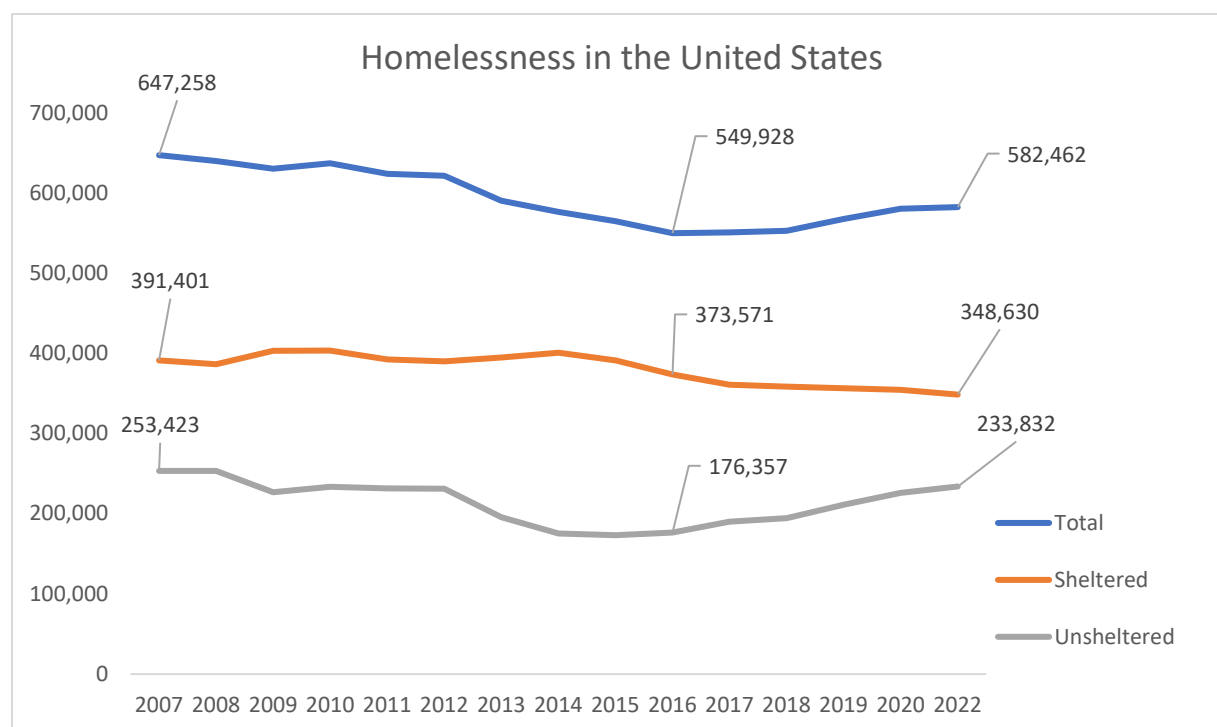
Homelessness

HUD collects and publishes data on homelessness in the United States in the *Annual Homeless Assessment Report (AHAR)* to Congress, which is made up of two parts. Part 1 of the AHAR, commonly called the Point-in-Time (PIT) count, is a national, one-night count conducted in late January and includes people experiencing homelessness in the shelter system and in unsheltered settings, such as sleeping outside, in a tent, in a car, or other places not meant for human habitation. Communities are required to conduct sheltered counts annually and unsheltered counts biennially, although most of the largest jurisdictions do so annually. Part 2 of the AHAR is a deduplicated count of all the people who have accessed the sheltered homelessness system over the course of a year—that is, anyone who has accessed an emergency shelter, transitional housing program, or other kind of temporary accommodation for the homeless, such as hotels or noncongregate shelter facilities.

² Missing or unknown responses account for more than 70 percent of the National Human Trafficking Hotline data; thus, a breakdown of data on race/ethnicity is not included.

³ UCR data from 2019, the last year for which age data are available, show only 3 percent of arrests involved juvenile victims. However, missing/unknown data are also a major issue in this field.

Exhibit 2. Homelessness Trends 2007–2022⁴



Source: Part 1 of HUD's 2022 Annual Homeless Assessment Report

Exhibit 2 is from the 2022 AHAR Part 1 and shows the general trend in total homelessness over time.⁵ On a single night in 2022, 582,462 people experienced homelessness across the United States. This number is down from a high of 647,258 people in 2007, the first year for which national data are available. Homelessness has ticked upward since reaching a low of 549,928 in 2016, driven by an increase in unsheltered homelessness (De Sousa, et al, 2022). Just over 60 percent of people experiencing homelessness are men, and 72 percent of people are tracked in HUD data as “individuals”—that is, people who are in a household without a minor child, usually single adults. Among people experiencing unsheltered homelessness, men make up an even larger share, 68 percent, and individuals make up the vast majority, just over 92 percent. People staying in unsheltered settings are much more likely than people staying in shelters to be dealing with substance use and mental health issues and be chronically homeless—meaning a person has a disability and been continuously homeless for one year or more or has experienced at least four episodes of homelessness in the past 3 years, in which the combined length of time being homeless on those occasions is at least 12 months (HUD, 2022a).

The number of homeless families—that is, any household with at least one adult and one minor child—has trended down over the last decade, falling from just under 240,000 in 2012 to 161,070 in 2022. Almost 90 percent of families experiencing homelessness on a given night are in the shelter system.

⁴ HUD did not report unsheltered data in 2021 because of disruptions caused by the COVID-19 pandemic, and as such, data for the year are excluded.

⁵ Communities were not required to conduct an unsheltered count in 2021 because of the COVID-19 pandemic, so only the sheltered total is presented.

Data from Part 2 of the AHAR present a more detailed picture of who these families are. Just over one-half (56 percent) of these families were experiencing sheltered homelessness for the first time, the vast majority (90 percent) were headed by women, and about three-fourths (75 percent) were headed by a single parent.

Youth Homelessness

Unaccompanied youth—that is, young adults aged 18–24 and minor children younger than 18 who are not in a household with their parent or guardian—are tracked separately from other household types. As tracked by the PIT count, the number of unaccompanied youth experiencing homelessness has fallen from just over 40,000 in 2017 to just over 30,000 in 2022. Part 2 data show that roughly 93,000 unaccompanied youth experienced sheltered homelessness at some point between October 1, 2019, and September 30, 2020. Other researchers have employed different approaches to try and account for the particularly transitory and hidden nature of youth homelessness. Chapin Hall’s Voices of Youth Count study produced prevalence estimates that show as many as 3.0 percent of households with minors aged 13–17 and as many as 5.2 percent of young adults (18–25 in this study) experienced “explicit homelessness,” which includes both literal experiences of homelessness—staying in a shelter or unsheltered location—and experiences of having run away from home or having been kicked out and staying somewhere else for at least one night (Morton, Dworsky, and Samuels, 2017). This much larger group includes people who would not show up in HUD data, so an apples-to-apples comparison is not appropriate, but the circumstances these youth report facing could mean that the youth in question were eligible for services in the homeless system and likely would be considered at risk of homelessness.

Other data sources track a combination of homelessness and deep housing insecurity among school-aged children and youth younger than 18. The National Center for Homeless Education, run by the Department of Education, found that during the 2020–21 school year, approximately 1.1 million youths in prekindergarten through 12th grade, or 2.2 percent of all U.S. students, experienced unstable housing (that is, lacked a fixed, regular, and adequate nighttime residence) (National Center for Homeless Education, n.d.). According to the Youth Risk Behavior Survey administered by the Centers for Disease Control, in 2021, 2.7 percent of U.S. high school students experienced unstable housing (McKinnon, et al., 2021). The survey found that, compared with students who were stably housed, students who were unstably housed were more likely to engage in risky sexual behaviors, substance use, and suicide ideation and attempts, and they were more likely to experience violence. Given the disproportionate rates of trafficking experiences among runaway and homeless youth noted earlier, heightened housing instability and homelessness among youth is especially concerning.

Homelessness Among Survivors

It is difficult to get the full picture of the intersection of homelessness or deep housing insecurity and past or current experiences of human trafficking, domestic violence, or other kinds of gender-based violence using available data. Survivors are largely hidden within data systems and data collection efforts around homelessness, and most other instances of estimates about the incidence or prevalence of housing insecurity or homelessness among these groups come from individual studies.

In HUD data, the AHAR Part 2 tracks past and present experiences of domestic violence among people experiencing sheltered homelessness. Data from 2020 show 32 percent of heads of households and other adults in families with children experiencing sheltered homelessness were survivors of domestic

violence, and 15 percent were currently fleeing unsafe situations.⁶ Given that this estimate includes only shelters that are not considered domestic violence shelters, which, by law, may not provide data on people experiencing homelessness to a Homelessness Management Information System (HMIS), the percentage of all sheltered homeless families that were fleeing domestic violence in 2020 was likely higher. More than one in five (22 percent) unaccompanied, sheltered youth were survivors of domestic violence, and 6 percent were currently fleeing domestic violence at the time they were in a shelter program.

Data on experiences of homelessness and housing insecurity among survivors of trafficking specifically are less common in the literature. A survey of 127 survivors conducted by Polaris in 2017 showed that 64 percent of respondents reported being homeless or experiencing unstable housing when they were recruited into their trafficking situation (Anthony et al., 2018). The Polaris National Survivor Survey included a larger sample of 450 survivors and found that 64 percent reported experiencing homelessness or housing insecurity at some point during childhood (Woldehanna et al., 2023). Annual reports from the Trafficking Hotline include data on risk factors and vulnerabilities that applied to the likely victims immediately prior to or at the time of entry into the trafficking situation. An analysis of Trafficking Hotline data from 2015 through 2017 showed that, among survivors who reported experiencing homelessness or deep housing instability at the start of their trafficking experience, the vast majority of reported trafficking circumstances involved sex trafficking or sex and labor trafficking together (Anthony et al., 2018). Among all survivors who provided this information, 8 percent reported unstable housing as a risk factor, and 7 percent reported being a runaway or homeless youth as risk factors; those rates increased to 14 percent for both unstable housing and runaway or homeless youth status when looking specifically at survivors of sex trafficking (Polaris Project, 2021b). Although some studies observe relatively high rates of past experiences with trafficking among runaway and homeless youth populations, there are no comparable estimates of the proportion of the total homeless population who are survivors of trafficking.

Housing Insecurity

An extensive body of research and data collection exists on the prevalence, causes, and consequences of housing insecurity. The concept itself has several different dimensions that are relevant to survivors of trafficking and people potentially at risk of trafficking, including costs and cost burden to households, frequent and/or forced moves, safety and security, and housing quality.⁷ HUD produces and presents to Congress a comprehensive overview of housing insecurity called the *Worst Case Housing Needs* report. Households with very low incomes who do not receive government housing assistance are defined in the report as having “worst case needs” for adequate, affordable rental housing if they pay more than one-half of their income for rent, live in severely inadequate conditions, or both. Drawing on data from the 2021 American Housing Survey, the report finds that there were 8.53 million renter households with worst case housing needs in 2021 (Alvarez and Steffen, 2023). This kind of measure does not imply those households are at risk for an experience like trafficking per se, nor will all survivors experience housing insecurity prior or subsequent to a trafficking experience. Still, this report documents a substantial portion of Americans facing material economic hardship and unstable housing.

⁶ Data related to experiences of domestic violence come from a set of program-specific data elements in HMIS that are not used for congressionally mandated reporting and, thus, may be subject to undercounting.

⁷ *Housing quality* broadly refers to whether housing is substandard in any way, including issues with lack of heat or other utilities, lack of sinks or other plumbing, and the presence of hazards such as mold or holes in walls.

The National Survivor Study (NSS) from Polaris includes data on economic well-being and related measures of housing stability among survivors (Woldehanna et al., 2023). Survivors are actively engaged in the labor market, with only 17 percent of survivors reporting being out of work,⁸ but they still face challenges finding work that can support longer-term stability. Only 36 percent of survivors reported working full time, and 43 percent reported household incomes under \$25,000 per year—compared to just 23 percent of all households. NSS respondents also reported very high rates of homelessness, housing instability, and negative family outcomes during childhood, all of which are linked with experiences of homelessness later in life (Parpouchi, Moniruzzaman, and Somers, 2021; Cohen-Cline, Jones, and Vartanian, 2021). Rising rents and limited access to affordable housing resources are then likely to have an outsized impact on survivors, pushing many into serious housing instability and putting them at risk of experiencing homelessness.

Intersectional Nature of Deep Housing Insecurity

It is important for service providers and policy makers to recognize the diversity within the survivor population and seek to design tools and systems that are flexible enough to meet the spectrum of needs. A growing body of research is seeking to better understand intersectional identity among people experiencing homelessness and deep housing insecurity. Part of this work starts with better data on who has these experiences. National data on homelessness in the United States do not include crosstabulations of demographic factors, limiting the ability to understand the intersections of race, ethnicity, disability, sexual orientation and gender identity, veteran status, etc. (Lurie, Schuster, and Rankin, 2015). HUD analysis of the Census Pulse survey shows that housing insecurity metrics were higher for LGBTQIA+ African-American and Hispanic renter households than for their non-LGBTQIA+ African-American and Hispanic counterparts (Helms, Molfino, and Winter, 2022). This analysis also shows that LGBTQIA+ White renters exhibited housing insecurity rates similar to those of non-LGBTQIA+ renters. Categorizing a diverse group of people into uniform titles of “homeless” or “survivor” can flatten that experience. Researchers often default to terminology like “heterogeneous target populations” to capture this idea, but it is worth reinforcing that survivors are all different and that intersectional facets of their lives and identities will shape what they experience negatively in the form of discrimination and positively in the form of resilience and community.

Effects of the COVID-19 Pandemic

The COVID-19 pandemic exacerbated existing risk factors for populations at risk of trafficking situations and created additional barriers for anti-trafficking efforts. Shutdowns and shelter-in-place orders left many people living with those who would exploit them. Low wage and informal sector workers, many of whom were already in precarious economic circumstances, suffered considerably during the economic upheaval of the early stages of the pandemic (United Nations Office on Drugs and Crime, 2020). Between April 1 and September 30, 2020, the number of trafficking situations reported to the Trafficking Hotline in which assistance was needed within 24 hours increased by 40 percent (Polaris Project, 2020a).

Not only did the number of trafficking situations reported increase, but the types of trafficking situations and where the exploitation occurred adapted to the changing circumstances of the pandemic. Although reports of labor trafficking in industries like hospitality and commercial cleaning decreased, reports of labor trafficking and exploitation increased among agricultural workers. The daily number of reports

⁸ The employment to population ratio of prime age (25–54 years old) workers has recently approached historic highs of just over 80 percent. U.S. Bureau of Labor Statistics, 2023

with victims on an H-2A temporary agricultural work visa doubled (Polaris Project, 2021a). The decrease in some sectors correlates with the significant slowdown of economic activity in those areas. Conversely, the agriculture industry largely continued, and its workers were deemed “essential.” In addition, although reports involving traditional forms of commercial sex trafficking decreased, the number of situations reported involving recruitment and exploitation by traffickers using online platforms increased by more than 45 percent. This shift impacted the demographic profile of trafficking survivors because online situations involved the victimization of more minors and males than other types of trafficking (Polaris Project, 2021c).

The impacts of COVID-19 also made it more difficult for survivors of human trafficking to access critical services. Trafficking Hotline data showed that the number of situations in which people reported needing immediate emergency shelter nearly doubled in the first full month of shelter-in-place orders in April of 2020 compared with the month prior to major shelter-in-place orders and the same period in 2019 (Polaris Project, 2020a). However, many shelters and housing programs reduced capacity or stopped intakes to prevent the spread of the virus. Also, because of the complexity and depth of their trauma, survivors often need a wide range of services, the delivery of which was severely constrained during the pandemic due to both health concerns and financial limitations of service providers. Even if services were available, state restrictions on movement and travel, as well as scaled back public transportation, often made it difficult for survivors to access the services. In addition, government support, such as stimulus checks, did not reach many survivors because they face barriers to filing tax returns due to lack of identification, W-2 forms, or a permanent address (U.S. Advisory Council on Human Trafficking, 2021). Lack of access to services, in combination with other financial and emotional hardships, put survivors at risk of being retraumatized or even re-trafficked.

Organization of the Report

The remainder of this report is organized largely according to the research questions provided by Congress:

- Section 1 addresses the **assessments and outreach methods** used to identify and assess the housing and service needs of survivors.
- Section 2 outlines the **homeless and housing services available** and their general accessibility to survivors.
- Section 3 addresses more specifically the **policies and procedures that affect the availability and accessibility of homeless or housing services** to survivors, including how well those services are able to meet the specific needs of survivors.
- Section 4 addresses the **barriers to fair housing** and **housing discrimination** against survivors of trafficking who are members of a protected class.
- Section 5 discusses **best practices** in meeting the housing and service needs of survivors, as well as promising housing models, infrastructure considerations, and service-delivery models specific to survivors.

The report concludes with next steps for research and considerations for future policy discussions.

Section 1 – Methods of Conducting Outreach to Survivors and Assessing their Needs

This section seeks to address Congress’s request for information on formal assessments and outreach methods used to identify and assess the housing and service needs of survivors of human trafficking, including outreach methods meant to ensure effective communication with individuals with disabilities and to reach individuals with limited English proficiency.

Introduction to Outreach and Assessment

Given the oft-hidden nature of trafficking, there is no perfectly clear national picture of the scale of trafficking in the U.S., and as such there is no complete accounting of the ways that people exit their given trafficking situation and/or access housing and services. Analysis of DOJ data suggests that law enforcement intervention only directly responds to a portion of trafficking cases (National Institute of Justice, 2020). The social service sector undoubtedly connects with a substantial portion of survivors at or immediately following their trafficking experience. Other entities, such as medical providers or immigration officials, also likely intercede either knowingly or unknowingly in trafficking situations and help survivors exit. In addition, people also exit trafficking situations on their own or with help from family, community, or other social networks, absent any formal support. Although it is unclear how many people use or seek out these different pathways to exit a given trafficking situation, the kinds of outreach and assessment approaches employed by service providers and other institutions can help influence whether survivors are reached and the types of support they can receive. Trust is a critical element, relying on partners in which survivors have trust and systems working to build trust among survivors.

This report defines outreach as the process by which individuals or systems identify or make contact with survivors for the purpose of offering housing or services. Assessment is the process that providers of housing or services use to evaluate the needs of survivors. Outreach generally takes place on a system-to-system or system-to-person basis. System-to-system outreach can involve federal, state, and local government entities or their partners, including service providers. These systems can share information about or seek available resources—such as funding or technical assistance—or communicate the specific needs or profile of the population being served. System-to-person outreach generally involves front-line staff directly seeking out people who may benefit from their services. This outreach can also take the form of investigation, which seeks to identify trafficking and/or traffickers within the context of systems like law enforcement or in other situations in which a survivor may otherwise remain invisible. This report focuses on two aspects: 1) assessing whether a person in a given system is a survivor of trafficking and 2) assessing what kinds of housing and service needs a survivor may have.

Partnerships and Visibility

Given the realities that survivors can face both during and after their trafficking experiences, the primary ways in which survivors can be identified by authorities is often through interactions with other institutions, such as law enforcement and healthcare providers. The HHS report *Evaluation of the Domestic Victims of Human Trafficking Program* asked trafficking service providers about survivor identification and client efforts. The study found that most referrals of survivors for services come from either existing clientele (that is, when trafficking services are a component of a given organization’s portfolio of work) or through referrals from partner entities (Hardison Walters et al., 2021). The study

also found that program grantees were able to increase awareness of their work and the needs of trafficking survivors generally through system-to-system outreach, such as trainings and technical assistance engagements.

National statistics on trafficking, however incomplete they may be, show that a substantially larger number of individuals reach out to services like the Trafficking Hotline than are identified by active law enforcement interventions. These data suggest that outreach, even without direct intervention and screening, but in the form of increased visibility and accessibility of resources for survivors, can have clear benefits. Helplines and websites with connection points to available resources, prompts to seek services, or sets of questions meant to facilitate access to needed supports should be designed with accessibility in mind. The Trafficking Hotline allows for contact via phone, text, email, chat, and teletype, a communication method used by individuals with auditory or speech impairments (National Human Trafficking Hotline, n.d.). On top of these kinds of outreach options, engagement with individuals with lived expertise has highlighted the need for informational and outreach materials to be available in more languages—not just English and Spanish. In addition to accessibility, the Trafficking Hotline is led through a trauma-informed approach, which law enforcement interventions do not necessarily use.

Screening Tools to Identify Survivors

Although research suggests that the number of survivors far exceeds the number of people identified through formal outreach and identification strategies, it is also true that the institutions likeliest to interact with survivors—such as law enforcement, medical providers, and homeless services providers—deal with huge numbers of people every day. In addition to system-to-system level engagement to raise general awareness of trafficking as an issue, institutions that potentially interact with survivors, including trafficking-focused service providers themselves, need validated screening tools that can identify survivors.

As a part of the agency's National Strategy to Combat Human Trafficking, DOJ set an important goal to "develop and disseminate a DOJ human trafficking victim screening protocol to identify potential human trafficking victims during law enforcement operations" (DOJ, 2022). A variety of screening tools are available, some targeted to specific populations or service provision settings, but the higher-quality tools identified in this research share an intentional use of trauma-informed practices, including by recognizing the effects of violence and the work needed to cope and heal; identifying co-occurring problems and making referrals to services; ensuring interactions with service providers that are culturally and linguistically appropriate; minimizing the possibility of retraumatizing; and emphasizing education, choice, and resilience. Several of these tools are discussed below.

General Screening Tools

The Adult Human Trafficking Screening Tool (AHTST) was developed with support from the National Human Trafficking Training and Technical Assistance Center and is an important example of a tool that can be readily deployed in behavioral health, healthcare, social service, and public health settings (Macias-Konstantopoulos and Owens, 2018). The AHTST is an eight-question index designed to identify experience of force, fraud, and coercion that may indicate a risk for current, former, or future trafficking. Developing trust is a central component of effective service delivery for survivors in general, and the AHTST's accompanying toolkit includes guidance on how an emphasis on survivor autonomy, language access, cultural responsiveness, and confidentiality can enhance the ability of the providers to both identify survivors and deliver services more effectively. Similar tools, such as the Trafficking Victim

Identification Tool developed by the Vera Institute of Justice, have different sets of questions (including both longer and shorter versions) but generally focus on similar themes (Vera Institute of Justice, 2014). Crucially, the guidance on implementing these screenings places a considerable emphasis on creating an environment of safety, respect, and trust in the service setting in keeping with trauma-informed principles.

Youth Screening Tool

Youth experiencing homelessness are especially vulnerable to exploitation by traffickers. In addition, huge numbers of youth experience deep housing insecurity at the cusp of homelessness, implying that, at the very least, the risk of trafficking is highly disproportionate among youth experiencing housing instability. Apart from the scale of the issue, youth survivors have unique trauma experiences and service needs, and they therefore interact with a different set of institutions. Chisolm-Straker et al. developed the Quick Youth Indicators for Trafficking (QYIT), allowing providers to screen for trafficking among homeless young adults (Chisolm-Straker et al., 2019). An affirmative answer to at least one of the four QYIT questions is highly effective at both identifying survivors of trafficking and differentiating between trafficking experiences and other needs. The research team also noted that among QYIT false-positives—youth who were flagged as having had a trafficking experience but did not—about one-third of these assessments revealed severe abuse, survival sex, or another form of exploitation that was indicative of complex service needs. Similar work by a team from the Urban Institute developed the Human Trafficking Screening Tool to capture the experiences of young people involved in the child welfare and Runaway and Homeless Youth systems (Dank et al., 2017).

Screening in Medical Settings

A key touchpoint through which to reach survivors is contact with the medical system. Survivors routinely have visits to healthcare providers to address workplace injuries or receive medical care because of physical abuse, violence, sexually transmitted infections, and other medical issues directly related to their trafficking. Too often the medical system fails to identify survivors during these interactions. One meta-analysis of screening processes found that between 50 and 88 percent of survivors had sought medical care or otherwise had contact with the medical system during their trafficking experience (Hainaut, Thompson, and Ades, 2022). However, another study found that nearly 90 percent of emergency department staff, including nurses, physicians, nurse practitioners/physician assistants, registration clerks, and emergency department technicians, reported that they have not received training related to human trafficking (Donahue, LaVallee, and Schwien, 2019). Medical providers are often better suited to notice or otherwise be in a position to identify the kinds of red flags that could indicate trafficking risk, but interactions with survivors offer some important lessons for other settings (Polaris Project, 2010b). For example, a medical assessment framework from Polaris includes many of the same themes and types of questions from other screening tools, but it places those questions in a critical second set of steps after first responding to immediate needs related to health and well-being and before a concrete set of steps medical providers can take to connect survivors to services (Polaris Project, 2010a). Peterson et al. document efforts to increase emergency departments' screening and identification of severe trafficking among high-risk youth aged 11–17 using the Short Screen for Child Sex Trafficking (Peterson et al., 2022). Their work similarly places the screening tool itself within the context of other steps, including flagging possible risk factors during otherwise standard intake or interactions with patients and using answers to screening questions to prompt more in-depth assessment.

Assessing Housing Needs

Subsequent sections of this report will discuss the function and availability of housing assistance. However, when talking about assessments, it is important to underscore that most housing programs do not have sufficient resources to give everyone that seeks their help the assistance they likely need (Fischer, Rice, and Mazzara, 2019). This baseline reality of scarcity means that, to the extent that housing providers assess need, they are not necessarily putting people's experience of trauma or abuse at the forefront. Housing programs may choose to offer assistance to all eligible clients on a first-come, first-served basis, or they may prioritize among eligible clients using criteria such as the client's level of housing insecurity, risk of homelessness, or actual homelessness. Basic eligibility determination is often the simpler approach, beginning with asking whether a person is experiencing housing instability or homelessness, then whether the person has a low enough income or if they are in a target demographic group—for example, seniors or people with disabilities. Prioritization methods such as waitlists with preferences or vulnerability assessments function as a means to get households with the highest need—or otherwise preferred groups—access to housing assistance sooner.

Systems of preferences benefiting certain groups are common among Public Housing Agencies (PHAs)—the local entities who administer HUD's core rental assistance programs—although their implementation varies considerably (Dunton et al., 2014). Use of housing needs assessment tools is more common within homeless assistance systems. In the 2010s, as HUD began encouraging the implementation of Coordinated Entry Systems that intentionally targeted resources to the most vulnerable, use of tools like the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) increased dramatically (Moses and Oliva, 2022). Tools like the VI-SPDAT, which uses a set of questions at intake to triage people experiencing homelessness in service settings, were evidence-informed in their design. However, few tools have been validated, and analyses of their implementation have found major equity concerns, including clients of color receiving statistically significantly lower prioritization scores on the VI-SPDAT than their White counterparts (Wilkey et al., 2019). These tools have not remained static; the VI-SPDAT has been updated periodically, and specific versions tailored to certain sub-populations, including transitional-aged youth, have shown promise, but more work is needed to build out tools that can help communities prioritize scarce resources in a valid, equitable way.

Keys to Effective Outreach and Assessment

A consistent theme in stakeholder meetings with policymakers, practitioners, and people with lived experience is how critical it is for service providers to build the trust of survivors. For outreach and assessment activities to reach survivors and understand their needs, survivors—many of whom are actively dealing with shame, isolation, trauma, and fear—need to be willing to engage with a service provider or case manager. Survivors know what they need from a provider to feel safe and be stably housed—the providers need to ask. The following sections talk about the different ways that organizations and institutions build trust to better engage with and understand the needs of survivors by fostering community, sharing information, and meeting people's needs. These kinds of approaches underscore how different outreach and assessment processes can look from one to the other based on where the outreach and assessment is taking place and for which kinds of survivors.

Conducting Needs Assessment

The “needs assessment” approach has come up repeatedly in conversations with stakeholders and in the literature. Needs assessment is a way to approach the early stages of a survivor-service provider relationship rather than a particular tool or protocol. The stakeholders consulted for this study discussed

how needs assessment often occurs at the early stages of a survivor-service provider relationship and, if done well, can be an important step in building trust. Key to an effective needs assessment is centering survivors' autonomy in identifying and addressing the barriers to safe and stable housing. In contrast, an intake process that simply followed a standardized form to determine eligibility for a given resource might retraumatize or alienate a survivor or miss something that could help a survivor achieve stability. In one listening session, a participant said that data and screenings are for researchers, and needs assessments are for survivors (Service Provider, May 5, 2023, personal communication). Successfully implementing a trauma-informed needs assessment process requires thoughtful program design across every touchpoint a survivor may have with a system: ensuring that people feel safe, that they know their rights and are empowered to make their own choices, and that there is a process to get people access to the services they need in the immediate, medium-, and long-term (OVCTTAC, n.d.b.). In this model, outreach, screening, and assessment are designed in ways that work within the broader context of a needs assessment by making sure that immediate needs (like food or personal safety) are met first, people are comfortable where outreach or engagement is taking place, assessments are as short and use as much already available data as possible, and assessments are delivered in a fully accessible way (in the appropriate language or with the appropriate communication medium) for every survivor.

For individuals with disabilities, advocates emphasize the importance of in-person services and outreach being available in American Sign Language, forms and information being in clear language, staff being available to help people who need support, and a general understanding that some survivors with disabilities may rely on caregivers or supportive family to help navigate service systems (NDRN Listening Session, November 10, 2022).

Partners in Non-Trafficking Service Settings

The service providers consulted for this study ranged from providers that focus specifically on trafficking survivors to those that serve survivors as a component of a more general group of clients or clients with similar service needs. Broadly speaking, service providers who incorporated trafficking services into a broader suite of activities or worked with trafficking survivors as a component of a larger client population tended to be larger in terms of budgets, staff, and capacity because these organizations have larger sets of responsibilities and related sources of funding. However, the involvement of those larger service providers also underscores an important reality: a wide network of social services organizations likely do not specialize in serving trafficking survivors, but they have either related specialized capacities or may already be serving survivors. For these broader service providers, the most effective outreach to and identification of survivors is done in partnership with community-based organizations. Not only do community-based organizations provide referrals to service providers, but direct outreach in partnership with these organizations can help build trust between survivors and the service provider. That outreach can also be a source of education for the provider, building capacity to adapt to the specific needs of survivors of different communities and cultures. With their generally larger budgets and capacity, these service providers are important partners and a valuable audience for training, technical assistance to tailored services, and outreach to build capacity to identify and serve survivors of trafficking.

Victims Service Providers (VSPs), or organizations that provide services to people who are experiencing or are survivors of domestic violence, dating violence, sexual assault, stalking, or other forms of gender-based violence, stand out as important partners in efforts to expand outreach and visibility efforts for trafficking survivors and those at risk of trafficking. Traffickers can often have close personal relationships with the people they victimize—as romantic partners, friends, or family members. People

who are survivors of sex trafficking might also be exposed to other types of interpersonal or sexual violence while they are being trafficked or as they seek to leave a trafficker. VSPs can have more experience delivering trauma-informed services, placing an emphasis on safety, collaboration, and empowerment to build trust among survivors (OVCTTAC, n.d.b.).

Partners in Culturally Specific Service Providers

Providers can specialize in serving clients based on shared experiences, such as language or culture, immigrant or refugee status, age, or gender and sexual identity. The VAWA statute defines “culturally specific services” as community-based services that include culturally relevant and linguistically specific services and resources to culturally specific communities (34 USC § 12291). Lacking a culturally informed approach to service provision presents a possibility of failing to reach certain survivors or perhaps retraumatizing them. An advocate gave the example of service providers who needed family members or friends of survivors to serve as interpreters, which meant survivors were forced to share difficult, often retraumatizing details of their trafficking experience via family members rather than in confidentiality with trained staff. Beyond frontline staff who speak a survivor’s native language, these specialized providers build a unique relationship with their community and are often staffed or led by people with shared experiences. That experience helps providers understand the intersectional nature of these groups and what their experiences can mean for service delivery needs far better than the broader programs. Unfortunately, these providers tend to be left out of substantial funding and often are not the direct recipients of government funding. Thus, any effort to augment outreach and effective assessment of trafficking survivors needs to include training, technical assistance, and capacity building to help the more specialized, culturally specific providers better integrate into the larger service system so that they and the survivors they serve can have more equitable access to resources.

Critical Context for American Indian and Alaska Native Survivors

Outreach and assessment of survivors who identify as American Indian or Alaska Native (AI/AN), as well as Native Hawaiian or other Pacific Islanders who are indigenous, present a complex and unique set of issues. Exploration of this complexity first requires a note about language. Research, policy, and advocacy often use the terms Native Americans, First Nation, or Indigenous interchangeably with racial categories used in the U.S. Census. Advocates for AI/AN-focused service providers note that this differing language use can present major challenges when trying to push for funding or representation because not using officially recognized data categories can render AI/AN individuals invisible. Throughout this report, AI/AN, which is defined by the Census Bureau as “[a] person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment” is used whenever making reference to official findings, programs, or policy implications (U.S. Census Bureau, 2002). A discussion is ongoing regarding the inadequacy of current race and ethnic data collection standards in some cases and some proposed alternatives, but until those changes are implemented it is important for researchers and policymakers to recognize the ways in which demographics in data collection can shape access (Maxim, Sanchez, and Huyser, 2023).

Native Americans in this sense can fit within a census data category of AI/AN and within their own legal framework. In the 2020 census, 1.1 percent of people identified as AI/AN alone, but nearly three times that number of people identified as AI/AN alone or in combination. Native survivors can be a member of one of the 574 federally recognized tribes or not have any official tribal affiliation; people can live on or off tribal lands and live in rural, urban, and suburban communities. It is also important to note that

where native survivors seek and receive services is a diverse landscape as well. Some “native-focused” service organizations have tribal affiliations or locations on tribal lands, and some do not. This diverse set of personal contexts shapes the way survivors can access services and face often vastly disproportionate housing challenges. For example, Seattle-King County in Washington State had the third largest number of people experiencing homelessness of any community nationally in 2022, and although people identifying as AI/AN make up just 1 percent of the county, they make up 9 percent of the homeless population (King County Regional Homelessness Authority, 2022).

A wide variety of considerations are within the context of outreach and assessment processes, many of which come down to the themes of trust and visibility highlighted in this section. This report is not equipped to fully capture the scope of the issue or its historic complexities, but Native peoples—those seeking services and those working in service provision organizations—have longstanding, deep-seeded reasons to be wary of public institutions. An important lesson for funders, including those at different levels of government, private foundations, and more mainstream service providers is that a different kind of work and relationship-building is necessary, certain culturally specific service partners are needed to support Native survivors, and those Native-focused service organizations need real partnership and funding of their own to be meaningfully included in the service provision ecosystem.

Critical Goal to Avoid Retraumatizing

Trauma-informed service practices are critical to effective outreach and assessment within a given service setting, but survivors often do not have a static, one-off experience. People seeking social services in general, and survivors in particular, often experience the worst aspects of these too-often fragmented, confusing systems. Survivors can be retraumatized during this process by a lack of control; experiencing unexpected change; feeling threatened or attacked; feeling vulnerable or frightened; or being made to feel ashamed. The risk of retraumatization can create a host of problems for survivors, including being less likely to seek services at all and more likely to disengage from services if they have started.

In conversations with service providers and people with lived experience, one of the notable ways this phenomenon manifested itself in connection with outreach and assessment was the fact that survivors are often made to go through repeated screening, intake, or eligibility determination processes. From the perspective of a given government agency or provider, assessment can involve filling out a form or multiple forms. However, for survivors, this process can mean lengthy meetings with case workers and telling their stories—which can involve divulging deeply personal, traumatic, or shameful information—often again and again.

A key piece of guidance in conducting trauma-informed intake is to complete as much of the intake ahead of time as possible with a survivor’s known information (OVCTTAC, n.d.c.) Real substantive barriers to adopting this kind of approach system-wide include different programs with different funding sources, eligibility, and requirements; privacy and data sharing rules; and a fundamentally time-intensive and costly process. Still, improving how outreach and assessment happen at the system-level has the potential to benefit survivors.

Considerations for Outreach to Noncitizens

A critical dimension of the ways in which trafficking survivors are identified and their needs assessed is the legal framework that grants survivors certain rights and protections. This report discussed broader VAWA protections in an earlier section, but the rights afforded to survivors who are noncitizens are particularly relevant to a discussion of outreach and assessment, primarily because foreign nationals make up 34 percent of all trafficking survivors, according to DOJ data, and roughly 97 percent of labor trafficking survivors, according to 2021 data from the Trafficking Hotline (U.S. Department of State, 2022).⁹ Between 2015 and 2018, of the 17,000 reports to the Trafficking Hotline in which information about immigration status was collected, approximately 52 percent of survivors were not U.S. citizens or legal permanent residents and could be at increased risk of housing instability and homelessness (Polaris Project, 2020c).

With foreign nationals making up, by one estimate, 34 percent of survivors, understanding the legal status and rights of foreign nationals is critical to meeting survivors' needs.

For noncitizens, their immigration status will impact their eligibility for HUD-funded programs or services. Without a clear understanding of whether they are eligible for different types of federally funded housing, noncitizen survivors might not seek services due to an incorrect assumption that they would face additional legal consequences, such as deportation, or they might be incorrectly denied services. Survivors from other countries might not understand how to navigate service systems in the United States and/or might encounter service systems that mistakenly think these survivors are not eligible for services. Mainstream housing and service providers might lack an understanding of the different types of immigration statuses that survivors have and what that means in terms of their eligibility for federal assistance. Technical assistance aimed at sharing this information and dispelling myths about noncitizen survivors' rights would be beneficial to both service providers and the survivors they serve.

Choosing Where to Conduct Outreach

A key aspect of targeting outreach and assessment efforts in ways that best reach survivors is understanding how certain events or circumstances can increase trafficking risk. Increased risk happens in many ways, including through destabilizing events that have the potential to make more people susceptible to trafficking or attract or incentivize traffickers. These events and circumstances present an important opportunity for organization-to-organization outreach and other forms of training and technical assistance. Trafficking survivors, during or after their experiences, will not always seek help from or naturally interact with the systems identified earlier in this section. The examples below are each worthy of their own focused analysis but are presented here to illustrate the different ways in which certain times or places can be used to identify increased risk or likely presence of trafficking survivors.

Natural disasters may increase the risk of trafficking and present an important opportunity for outreach, technical assistance, and collaboration among organizations working with survivors.

Disasters can be destabilizing for survivors or people at risk of trafficking for the same reasons as they are destabilizing generally. Hurricanes, wildfires, or floods can destroy people's homes, require

⁹ Trafficking Hotline data on immigration status for cases involving sex trafficking had missing/unknown responses in over 90 percent of cases and are not included.

evacuations, and even uproot whole communities. Survivors and people at risk of trafficking largely have personal and economic conditions that can make these kinds of disruptions more difficult to manage. Disasters also tend to exacerbate issues of housing instability and homelessness in affected communities. Apart from situations in which people already living in a community impacted by a disaster are put at risk of exploitation, recovery from a disaster also presents a challenge. For example, following Hurricane Katrina, there was a substantial uptick in labor trafficking in the Gulf Coast region, with cases found in the construction sector working on cleanup and recovery and in the domestic and hospitality sector in area hotels (Stahl, Parenteau, and Chilka, 2018). Within the context of disaster response, first responders and emergency management offices would likely benefit from training and technical assistance resources, outreach, and general engagement on the part of trafficking service providers.

Major public events and the large influx of people they bring are often seen as possible targets by traffickers. Reports have documented that events like the Super Bowl can elevate community risk, with the homeless assistance system both a target and source of service provision and crisis response for survivors (HUD SNAPS Staff Meeting, July 6, 2022). Analyses of various U.S. and global sporting events often show increases in online advertisements for commercial sex, but there is no concrete evidence that trafficking incidences increase (Huang, Yoder, and Tsoukalas, 2022; Finkel and Finkel, 2015). Still, U.S. cities will host the Olympic games and World Cup soccer tournament in the coming years, and advocates suggest that service providers in these communities could use these events as an opportunity to build relationships with private sector partners, dispel myths about survivors, or otherwise redirect some of the media focus on the topic to more constructive goals, such as scaling up operations, building partnerships with hotels or other tourism industry stakeholders, or increasing general awareness of their work among a wider network (Martin, Lauren, and Annie Hill, 2019).

Section 2 – Availability of Resources for Housing and Services

This section seeks to address Congress’s request for a review of the availability and accessibility of homelessness or housing services for survivors. This section also examines resources available to the family members of survivors who are minors involved in foster care systems; it also discusses efforts to meet the disability-related needs of survivors, including the need for housing with accessibility features.

Typology of Housing and Services

This section of the report focuses on the kinds of resources that survivors can access to ensure that they have a safe and stable housing situation. Affordable housing resources, and the kinds of supportive services that providers use to help survivors maintain safety and stability, vary substantially in their basic design. Focusing first on availability, this section categorizes the most common types of housing assistance and services in the United States, including how they are designed and the relative size and scope of the programs.

Accessibility

The following subsections discuss housing resources provided by agencies across federal, state, and local governments in addition to nonprofit, philanthropic, and some private sector entities. These resources can be grouped or considered alongside one another in a few different ways, but the primary way is based on the duration and level of assistance. The duration of assistance is categorized by: 1) immediate crisis resources that a survivor can access that day or otherwise very quickly; 2) short-term resources available for periods of days or a few weeks; 3) medium-term resources for several weeks or many months; and 4) long-term resources that can be provided for years or indefinitely. The level of assistance generally refers to either the intensity or cost of the services being provided.

This section uses the term *accessibility* in a few different contexts. Often, when discussing the needs of people with disabilities, accessibility can refer to, among other things, physical design features or the presence of other features, including the availability of information in different formats, or the provision of reasonable accommodations. The report also considers matters of accessibility, meaning simply whether it is reasonable to think a survivor could get a housing resource or service. For example, ways in which resources can be functionally inaccessible include a housing unit on the other side of town when a person lacks transportation or a voucher that would become available only after months or years on a waitlist. For more discussion of how these programs are implemented, including how their policies and procedures shape access and efficacy for survivors, see Section 3 of this report.

General Availability of Housing Resources

Generally, the fundamental reality of affordable housing resources, and in particular the kinds of housing resources that service providers and survivors with lived experience say they need, is extreme scarcity. There are simply not enough mainstream resources to meet the needs of lower income people in general. Only about one in four households who qualify for housing assistance receive it and, as of 2019, there were only about 55 affordable and available units for every 100 very low-income households (Alvarez and Steffen, 2021). This scarcity is also true of the homeless assistance system. In many parts of the country, the number of people in unsheltered situations or staying in shelter beds is considerably greater than the number of permanent housing options for people experiencing homelessness.

Earlier sections of this report have noted that many housing programs likely are already serving survivors. However, when considering a person exiting a trafficking experience or working with a service provider to help address housing stability, the likelihood is that the person is trying to access a severely limited pool of resources and/or working with service providers who may have limited training or experience with survivors of trafficking specifically. Furthermore, receiving the assistance needed to secure stable and affordable housing may serve as a protective factor, reducing the likelihood that people will be exposed to trafficking in the future. Experiences of homelessness and deep housing instability, particularly early in life, are predictive of future experiences of future housing insecurity and potential exposure to trafficking risk (Glendening and Shinn, 2017; Montgomery, et al., 2013; Chisolm-Straker, et al., 2019). Subsequent sections of this report will discuss the policies and practices influencing how survivors navigate these resource-scarce housing systems and promising approaches that could be expanded.

Appropriate Supportive Services

Research and policy writing on homelessness and work with survivors or other vulnerable populations tend to group the concept of housing assistance and supportive services together. As a first principle, survivors, especially those experiencing homelessness or deep housing insecurity, usually have complex sets of needs. Most service providers are aware of the complexity of needs, and even those focused on providing safe and stable housing generally try to provide some other set of basic supportive services. When those services are sufficient to meet the broad range of survivors' needs and are offered in a trauma-informed manner, they can help foster safety and stability throughout a survivor's time with a service provider. Some examples of critical services, with additional context on duration, intensity, and relevance within a trauma-informed service framework, include (OVCTTAC, n.d.c.):

- Food, both to meet the need for basic nutrition and food that is culturally appropriate.
- Clothing and shoes, especially those that are seasonably appropriate.
- Language services, such as interpretation or translation of important documents or online information.
- Immigration, criminal, and/or civil legal support, including help with legal actions as a result of trafficking and/or cases against traffickers.
- Court accompaniment and advocacy to navigate complex systems.
- Transportation support to access services and a general way to promote self-sufficiency.
- Medical care, including prescriptions, dental care, and vision care, including medical needs directly associated with their trafficking experiences or to address issues associated with longer term stability.
- Substance use treatment and mental health services, both inpatient and outpatient.
- Public benefits and navigating eligibility processes.
- Crime victim compensation.
- Links to culturally specific or faith communities.
- English as a Second Language (ESL), GED, or other educational programs.
- Employment training or assistance, including access to formal workforce development systems.
- Services for the children or other family members of survivors and family reunification services.

As with the broad spectrum of housing resources that can be available to survivors, this suite of services is offered by many different providers—and with the support of many different funding sources—in the government and nonprofit sector. Like housing resources, the extent to which a given service provider working with survivors can provide these supportive services depends on their general availability in the

community and the capacity different service providers have to navigate those processes. Some of these services are provided via funding specifically to the providers working with survivors, which can allow some providers to offer a suite of services; others are generally available and require survivors themselves, often with support from providers, to access these systems. This underscores the need for organization-to-organization outreach and education targeting the relationship between survivor-focused service providers and the institutional partners who have these services at the core of their work, such as law enforcement, public health, and medical systems.

Overview of Housing Resources

The following is a high-level overview of the different types of housing resources commonly available in the United States, grouped based on their funding sources. The goal of this list is to present resources available through federal “programs”—in the sense that they have a dedicated budget and legal authority—and program components, models, or eligible use of funds under grant programs or other sources of federal support. This list is not intended to be exhaustive of all types of housing resources; the National Human Trafficking Training and Technical Assistance Center’s *Housing Programs for Individuals Experiencing Housing Instability or Homelessness Environmental Scan: Outline of Findings* is a useful complement to this section (Henninger, Doelger, and Balchi, 2021). This subsection presents the major sources of funding, the structure of the assistance being provided, and the ways in which the programs are functionally available and accessible to survivors.

HUD Programs

In 2022, HUD’s rental assistance programs provided permanent housing to more than 9 million people within 4.5 million households (HUD, Office of Policy Development and Research, n.d.a.).¹⁰ Tenants supported by these programs are low-income people with eligibility varying based on program rules and area median income (HUD, Office of Policy Development and Research, n.d.b.). Households generally pay rent equal to 30 percent of their incomes after deductions, and the federal government pays the remainder of rent or rental costs. In addition to direct support to individuals, HUD programs provide support through loans and grants to help fund the development and operation of a range of different affordable housing options. This portion of the report discusses HUD programs, broadly grouped based on their ability to target support to trafficking survivors, potentially similar groups of survivors of GBV and IPV, and people experiencing homelessness.

HUD Programs that can be Targeted to Trafficking Survivors

The Housing Choice Voucher (HCV) program—sometimes colloquially called *vouchers* or *Section 8*—is currently HUD’s most common form of assistance. HCVs are a form of *Tenant-Based Rental Assistance*,¹¹ a term used throughout this report, often referencing assistance funded by different programs in which an assisted household finds and leases housing on the private rental market. The American Rescue Plan of 2021 included \$5 billion for roughly 70,000 **Emergency Housing Vouchers (EHVs)** targeted to vulnerable populations, including individuals and families who are experiencing or at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking,

¹⁰ Although the focus of this subsection is HUD’s rental assistance programs, survivors are likely accessing HUDs homeownership programs too. A panelist in a listening with lived experience noted that they were looking to purchase a home using a Federal Housing Administration mortgage.

¹¹ A PHA may use a portion of the PHA’s HCV allocation for “project-based vouchers” which are not tenant-based assistance. The mechanism through which PHAs use HCVs for project-based vouchers is described in 24 CFR § 983.5.

or human trafficking; or were recently homeless or have a high risk of housing instability. EHV come with additional administrative funding to support different kinds of housing search and wraparound services, and a recent round of funding supported approximately 4,000 **Stability Vouchers** targeting the same population.

Tenant-Based Rental Assistance (TBRA) is also the name of a specific eligible use of HOME Investment Partnerships (HOME). TBRA funded by HOME programs is a temporary rental assistance resource because it is limited to a maximum of 2 years of assistance, but it otherwise functions similarly to the HCV program. The **HOME-American Rescue Plan (HOME-ARP)** program provided an additional \$5 billion in one-time grants targeted toward the same populations as EHV: those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and human trafficking. These funds are being used for TBRA, the production and preservation of affordable housing, supportive services such as housing navigation and homelessness prevention, and development of noncongregate shelter facilities.

Homeless Assistance Programs

As tracked by HUD's 2022 Housing Inventory Count, the Homeless Assistance system—the housing and shelter resources explicitly targeted toward people experiencing homelessness—includes just over 1 million year-round equivalent beds, incorporating beds funded by all federal, state, and local partners that are dedicated to people experiencing homelessness.¹² Of that total, there are roughly 627,000 beds of permanent housing and 419,000 temporary shelter beds. *Permanent housing* for people experiencing homelessness means any form of community-based housing without a designated length of stay, whereas *shelter programs*, which include both congregate and noncongregate facilities, are characterized by being temporary and under the control of another entity, such as a service provider (42 U.S.C. § 11360). Broadly speaking, permanent housing resources should be thought of as comparable to any kind of assistance that lets people rent their own unit with a lease, whereas shelter programs, though sometimes actually in homes or apartments in addition to other purpose-built facilities, are not leased units.

HUD's **Continuum of Care (CoC)** program is the primary source of federal funding for homeless assistance programs nationally, awarding \$2.8 billion in FY 2022. The FY 2022 award included approximately \$80 million available for noncompetitive **Youth Homelessness Demonstration Program (YHDP)** renewal and replacement expiring grants and \$54 million available for **DV Bonus** projects. HUD CoC program award data for FY 2022 include 21 DV Bonus projects, receiving about \$9.6 million, that mention trafficking in their project description.¹³ YHDP helps support the development and implementation of a coordinated community approach to preventing and ending homelessness among youth, a group at considerable risk of exposure to trafficking experiences. DV Bonus projects are intended to address the unmet needs of survivors of domestic violence, sexual assault, and human trafficking within the existing homeless service system and beyond it (HUD, 2021a). In FY 2022, the

¹² HUD chooses to track beds, not units, to more accurately compare shelter facilities, which may be congregate in design, with more traditional apartments funded with permanent housing resources. This means units serving larger households like families count for more than one bed per unit. In addition, some programs that only operate for portions of the year or otherwise on a temporary basis are converted to an equivalent number of beds. HUD, 2022d

¹³ Many grantees report serving survivors of domestic violence and sexual assault alongside trafficking, but the available data do not specify what portion of those resources were committed to or ended up serving trafficking survivors.

Emergency Solutions Grants (ESG) program awarded \$290 million in funds to urban counties, metropolitan cities, states, and territories to support shelter and temporary rental assistance.

HUD-supported permanent housing resources for people experiencing homelessness are broadly distinguished by the duration of assistance and level of services committed. **Permanent Supportive Housing (PSH)** is a program model characterized by ongoing rental assistance comparable to an HCV combined with voluntary supportive services. PSH is prioritized for people experiencing chronic homelessness and can be either tenant-based using the voucher model or project-based in dedicated units and buildings. PSH is a program component of the CoC program, but PSH can be supported by other sources of funding such as **HUD-Veterans Affairs Supportive Housing (HUD-VASH)** or other federal, state, and local sources.

The other primary type of permanent housing assistance for people experiencing homelessness is **Rapid Re-Housing (RRH)**. RRH assistance allows recipients to find housing on the private market with a lease comparable to a voucher, but it is more accurately characterized as “Temporary Rental Assistance” because recipients generally are limited to up to 2 years of subsidy, though some locally funded programs can go longer. RRH allows for a considerable amount of flexibility in terms of the program design and tenant contribution to rent—for example, allowing service providers to pay for up to 100 percent of rent, contributing a fixed-dollar amount or percent rather than basing it on income, or in a graduated/stepped down structure—but generally speaking, assistance ends up being for around 6 to 9 months (HUD, Office of Policy Development and Research, n.d.d.). A similar form of assistance, **Homelessness Prevention (HP)**, targets households at risk of homelessness and provides housing relocation and stabilization services—including financial assistance to pay for housing costs—as well as short- and medium-term rental assistance. RRH and HP are program components of HUD’s CoC and ESG programs, but versions of these models are supported by other federal sources, including the **Supportive Services for Veteran Families** program run by Veterans Affairs, as well as other funders.

Shelter programs are grouped in HUD data to include **Emergency Shelters (ES)** and **Transitional Housing (TH)** programs. ES projects can be supported by the ESG program, though many operate solely with state, local, or philanthropic funding. These projects vary considerably; shelters can be large-scale congregate facilities, church basements with cots, converted single-family homes or other apartment-style setups with private rooms and shared common spaces, or hotels/motels either with people staying in rooms with the support of a voucher or in whole buildings that have been converted for shelter space. TH provides temporary places to stay and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period, but not longer than 24 months. TH is funded as a component of the CoC program, though funding has largely been shifting toward permanent housing options in recent years. Many other federal, state, and local partners fund some version of the TH model, in which people have a short-term place to stay—usually with some private space and some shared space—and access to supportive services meant to foster housing stability.

HUD also supports a program model that combines transitional housing and permanent housing resources through the **TH-PH and TH-RRH Joint Component** approach. These models provide a safe place for people to stay—that is, access to TH as a form of temporary housing to address the immediate crisis of homelessness—with financial assistance and wraparound supportive services determined by program participants to help them move to permanent housing as quickly as possible. Stays in the transitional housing portion of these projects are intended to be brief and without preconditions, and participants should quickly move to permanent housing (Suchar, 2017).

Survivors experiencing deep housing insecurity and homelessness as they leave their trafficking situations, and at any point after, are likely to interact with the homeless assistance system. The resources funded by HUD programs are structured in ways that could help meet survivors' needs for crisis shelter or short- to long-term assistance and services. The central constraint, as with more broadly targeted assistance for low-income households, is that there are often not enough resources to meet the need in a given community. Second, many shelters and temporary rental assistance programs struggle with getting access to services to help foster housing stability (District Alliance for Safe Housing Listening Session, December 16, 2022). In addition, many survivors may know about available resources in the homeless assistance system, but they may decide not to access them for a variety of reasons, including feeling unsafe or judged or because of the rules and policies of different providers. The homeless assistance system has, slowly over the last 10–20 years, begun to shift from the idea that people must move across a continuum of resources in order to demonstrate progress and earn housing to the idea that peoples' needs are on a continuum, and the job of the homeless assistance system is to connect people to permanent housing that best meet their needs along with the services needed to maintain that housing (HUD, 2014). Section 3 of this report includes further discussion of how the ways in which programs operate shape whether survivors can or will access them and how community decisions about prioritizing these scarce resources can impact survivors.

HUD Rental Assistance Programs that can be used for GBV, IPV, and Trafficking Survivors

HUD rental assistance programs support millions of low-income Americans, undoubtedly including a substantial number of survivors. These programs are generally not targeted to nor designed for survivors and their immediate needs. Although they are invaluable for supporting ongoing housing stability generally, two key realities shape how available and accessible these programs are: 1) the number of subsidized units or vouchers, which, as noted, is far outpaced by need, and 2) how long it can take to access these resources, which in some communities with long waitlists for rental assistance programs can be months or years.¹⁴

Project-Based Assistance, another commonly used term referring to a model of assistance supported by several programs in which households pay a subsidized rent and live in a specific building. Historically, the most visible type of this assistance has been the **Public Housing** program, in which PHAs own and operate individual buildings. PHAs also offer targeted special purpose vouchers like the **HUD-VASH** program, targeting chronically homeless veterans and **Mainstream Vouchers** for nonelderly persons with disabilities; those programs function comparably to the regular HCV program. In addition to the HCV program, HUD provides other sources of tenant-based rental assistance through smaller, targeted programs called Special Purpose Vouchers. As noted, PHA resources can be dedicated to different target populations, including survivors, using existing authority to establish limited preferences, which is discussed more in Section 3.

Project-Based Section 8 and other programs operated by HUD's Office of Multifamily Housing Programs provide opportunities for households to lease units in specific buildings owned by landlords who enter into contracts with HUD in order to receive housing subsidies. Other project-based assistance programs include **Section 202**, providing housing for seniors and **Section 811**, providing supportive housing for people with disabilities, which offer broadly similar types of assistance to allow people to live in certain buildings.

¹⁴ For descriptions of all of HUD's programs, see: <https://www.hud.gov/hudprograms>.

Similar to the HOME program, **Community Development Block Grant (CDBG)** funds go to a distinct set of grantees: local government entities often operating a set of housing and community development roles. In addition to funding TBRA, CDBG can also be used to develop or preserve affordable housing as well as build or rehabilitate facilities for social services provision—including housing programs for survivors. HUD data show that combined expenditures of the CDBG program and the CDBG-Corona Virus (CDBG-CV) program funded by the CARES Act of 2020 included \$19.7 million for services for survivors of domestic violence, dating violence, sexual assault, or stalking; \$96.8 million for youth services; \$23.8 million for childcare services; and \$19.2 million for mental health services.

Programs for Households with Child Welfare System Involvement

The **Family Unification Program (FUP)** is a special-purpose voucher program operated by HUD that targets families for whom housing stability is the primary factor in either the imminent placement of a child in out-of-home care, the delay in discharging the child from out-of-home care, youth aging out of foster care, or youth with a history of involvement in the child welfare system. The related **Foster Youth to Independence (FYI)** initiative instituted some changes to the FUP voucher model to better reach youth, and the Fostering Stable Housing Opportunities amendments in FY 2021 increased the maximum length of assistance from 3 years to 5 years across FUP and FYI. The program has documented issues with underutilizing vouchers, and discussions with program office staff highlight the difficulties inherent in the relationships between CoCs, PHAs, and Public Child Welfare Agencies (PCWAs), who are the referring partner for these vouchers (HUD, Office of Inspector General, 2023; Pergamit et al., 2022). Staff believe that targeting technical assistance to PCWAs, in order to build capacity to identify youth who could benefit from these programs and how to navigate HUD eligibility, is critical to increasing the functional accessibility of these vouchers to youth experiencing or at risk of homelessness (HUD Family Reunification Program Staff Listening Session, April 13, 2023). Further discussion of some of the barriers that arise from implementing the FUP program for youth is included in Section 3.

Programs supported by the Childrens Bureau in ACF, including those under **Title IV-B** and **Title IV-E** of the Social Security Act, provide an extensive array of services to children, youth, young adults, and their families who have involvement with the child welfare and foster care systems. These programs generally offer temporary housing services: either access to shelter or some form of navigation. The extent to which they support housing stability for providers likely most depends on how integrated these grantees are with other service providers, including VSPs, the homeless assistance system, and affordable housing providers more broadly.

HHS Programs

HHS funds programs that offer a wide range of supportive services, including some shelter and temporary housing assistance, that are either generally available to people with low incomes or that specifically target groups that disproportionately include survivors. ACF within HHS supports several programs targeted to trafficking survivors, but the programs vary considerably in scale. The Office of Trafficking in Persons operates the **Domestic Victims of Human Trafficking Program**, which funded 12 organizations to provide comprehensive case management and direct services and referrals in FY 2021, and the **Trafficking Victims Assistance Program** provides similar services to foreign nationals. The Office of Refugee Resettlement offers financial assistance and medical care, but the **Unaccompanied Children Program** and **Unaccompanied Refugee Minors Program** provide shelter and housing in the form of referrals and supports for placement with sponsors or other family members.

The **Family Violence Prevention and Services Act (FVPSA) Program** is the primary federal funding stream dedicated to supporting emergency shelters and related assistance for victims of domestic violence and their children. FVPSA formula grants to states, tribes, and territories fund emergency shelter, safety planning, and crisis counseling, and they provide referrals to other vital services with a focus on the intersectionality of domestic violence with homelessness and access to services and culturally specific needs. FVPSA grantees served more than 1 million clients in 2021, including the funding of more than 200,000 shelter stays (ACF, n.d.b.). ARP provided an additional \$1 billion in FVPSA grants to cover increased support for domestic violence and sexual assault services providers during the pandemic. These programs represent important targets for training and technical assistance on access to mainstream housing resources. Several of HHS's block-grant programs, including Temporary Assistance for Needy Families (TANF), the Community Services Block Grant, and the Supportive Services Block Grant, have broad flexibility in the eligible uses of funds that could help support survivors.

The Family and Youth Services Bureau operates the **Runaway and Homeless Youth Program** to support housing stability for unaccompanied homeless youth more directly. The **Basic Center Program** supports shelters and aftercare services in finding out-of-home placements or aiding homeless young people in reunification with their families. The **Transitional Living Program** funds housing and services for youth aged 16 to 21 who are unable to live safely with their families. Options for housing include group homes, maternity group homes, scattered-site apartments supervised by adults, and family homes. The **Street Outreach Program** funds organizations providing access to emergency shelter and crisis intervention services to those who could be at risk of or exposed to trafficking, sexual exploitation or abuse, or prostitution.

DOJ Programs

DOJ operates two programs specifically targeted to survivors of trafficking that provide housing and supportive services. The **Housing Assistance Grants for Victims of Human Trafficking** program, operated by the Office of Victims of Crime, funded 21 organizations in FY 2022 to provide up to 24 months of TH, short-term housing assistance, or crisis housing assistance for trafficking survivors, including assistance with rent, utilities, security deposits, and relocation costs (OVC, 2022). The Office of Violence Against Women (OVW) administers the **Transitional Housing Assistance Grants for Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking Program**, and in FY 2020, this program funded 80 organizations to provide TH, short-term housing assistance, and voluntary support services. Both programs generally adhere to survivor-centered, trauma-informed service provision, and domestic violence TH programs more broadly tend to be less restrictive than nondomestic violence-focused TH programs that mandate service participation (Clark, Wood, and Sullivan, 2018). However, the central constraint is that these programs are not scaled to meet needs nationally, and service providers administering these housing programs, especially those in high-cost markets, feel limited even with comparatively flexible, dedicated resources (Service Provider Listening Sessions, March 17, 2023, and May 4, 2023).

Other Federal Programs

The extent to which general affordable housing programs operated by other agencies are serving survivors is unknown. The resources in this section fit alongside programs operated by HUD and other federal partners within the context of the broader network of affordable housing in this country. Within the context of better meeting the housing needs of survivors, the key feature here is that these programs have a set of stakeholders that might be unfamiliar with a variety of issues at play in the

trafficking, victims' services, homelessness, or even general social service fields. Including property owners and this wider, more diffuse network of local and state government agencies in outreach, awareness, training, and technical assistance efforts is critical to ensuring that these kinds of programs can be more functionally available and accessible to survivors.

HUD's federal partners play an important role in expanding the availability of affordable housing and providing other important community development. The **Low-Income Housing Tax Credit** program is arguably the most important resource for creating new affordable housing in the United States today. Run by the Internal Revenue Service in the Treasury Department, the LIHTC program gives state and local LIHTC-allocating Housing Finance Agencies the equivalent of approximately \$9 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households (HUD, Office of Policy Development and Research, n.d.c.).

The U.S. Department of Agriculture (USDA) operates critical housing and community development programs under their Rural Development umbrella. The USDA **Community Facilities** programs offer direct loans, loan guarantees, and grants to develop or improve essential public services and facilities, including healthcare clinics, hospitals, adult and childcare centers, assisted living facilities, rehabilitation centers, public buildings, schools, and libraries, and the programs support many community-based initiatives (USDA, n.d.a.). USDA **Multifamily Housing** programs assist rural property owners through loans, loan guarantees, and grants that enable owners to develop and rehabilitate properties for low-income, elderly, and disabled individuals and families as well as domestic farm laborers (USDA, n.d.b.).

Pandemic Programs

The federal response to the COVID-19 pandemic incorporated a huge increase in resources for some key programs, providing affordable housing and working to prevent homelessness and housing insecurity. The largest investment, \$350 billion to the Treasury's **Coronavirus State and Local Fiscal Recovery Funds Program**, helped communities around the country prevent cuts to or expand programs providing affordable housing or supportive services. Another critical Treasury program, the **Emergency Rental Assistance Program**, provided \$46.5 billion to state and local governments for financial assistance, housing stability services, and other affordable rental housing and eviction prevention activities (U.S. Department of the Treasury, n.d.). Although quantifying the benefits of these programs for survivors specifically is likely impossible, the scale of responses focusing on housing stability measures during the pandemic was unprecedented.

During the COVID-19 pandemic, state, territorial, tribal, and local government entities, along with certain nonprofit organizations, used the Federal Emergency Management Agency (FEMA) **Public Assistance Grant Program**, specifically **Category B emergency protective measures** (NLIHC, 2020). This program allowed communities to seek FEMA reimbursement—first with a 75 percent federal government match, and then, in 2021, 100 percent federal coverage—to pay for, among other things, expanded noncongregate sheltering resources. The noncongregate shelters allowed communities to safely reduce density and occupancy in large congregate shelters to allow for social distancing. Many of these noncongregate options moved people into hotels and motels, either from shelters or directly from unsheltered situations. Studies of the implementation of these noncongregate programs found that residents had better housing stability outcomes than people in traditional congregate shelters and better access to services. In many cases, the programs ended up reaching a subset of the homeless population that had largely not been reached by the homeless system before (Colburn et al., 2020; Nisar

et al., 2020). Use of noncongregate shelter options in the form of hotel/motel vouchers is an established program practice for serving survivors. The pandemic experience greatly expanded the reach of these programs and demonstrated the ways in which they can be applied within the context of addressing housing insecurity.

State and Local Programs

In addition to having a considerable amount of control over implementation of certain federal sources of funding, state and local governments have the ability to operate a wide range of programs for survivors or people experiencing homelessness. Washington State operates a targeted trafficking rental assistance program through their Office of Crime Victims Advocacy within the state's Department of Commerce (Washington State Department of Commerce Listening Session, April 24, 2023). Section 5 of this report includes further examination of the program design and implementation. In California, the state has moved to greatly expand options through Project Homekey, which built on the lessons of pandemic homeless projects and converted hotels and motels to PSH and noncongregate shelter options (Reid, 2022). These are just a few examples of the ways in which states have used their own resources, either with state general funds or leveraged federal money, to expand the pool of available housing resources for survivors.

Hotel and Motel Voucher Programs

Many programs offer hotel and motel vouchers to help survivors have a safe place to stay, usually as a short-term solution for a period of days (Freedom Network, 2020). These voucher programs are functionally similar to FEMA's pandemic response to noncongregate sheltering, but they can be funded by many federal sources, along with state and local governments. Philanthropic partners are also common; hotel chains often donate rooms either as blocks of vouchers or make unused rooms available on a more ad hoc basis, sometimes using mobile app tools like ReloShare or SafeNight, operated by the Safe Shelter Collaborative (Safe Shelter Collaborative, n.d.). Hotel vouchers are a valuable tool to get people to safety immediately, because they can be deployed quickly, be used in most communities, and even be used as a component of responding to a person actively trying to leave a trafficking situation. As with vouchers used for noncongregate sheltering, hotels can be more appealing to many, compared to group or shared shelters, because they offer more privacy and anonymity. Hotel and motel vouchers should be thought of as a short-term solution, either for survivors who have the ability to address longer-term housing stability on their own or for survivors who might need a safe place from which to access wraparound services and supports for basic needs.

Key Housing Resource Gaps

In discussions with stakeholders, a few specific cases came up frequently, either in referencing major gaps in available services or as examples of groups of survivors who are particularly poorly served by fragmented systems. Further analysis of how survivors access and face barriers to these programs is further outlined in Section 3.

Programs Serving Households with Disabilities

According to a Government Accountability Office report, in 2019, HUD assisted an estimated 1.8 million households that had people with physical, mental, or other disabilities (GAO, 2023). Their analysis showed that roughly 42 percent of HUD-assisted households had at least one person with a disability, compared with 19 percent of the general population of all renters, and income-eligible households with a resident with a disability were more likely to receive HUD rental assistance than households without

one. HUD's Section 811 and Mainstream voucher programs specifically target nonelderly persons with disabilities, but a substantial number of households with a person with a disability are served in general rental assistance programs, such as Public Housing and the HCV program. The extent to which these programs are functionally available to survivors is limited by resources, particularly because a large proportion of the population who have disabilities are still not receiving assistance. As noted in Section 1, physical accessibility of units is an important aspect of whether a program or type of assistance is functionally available to survivors. A service provider focused on survivors with disabilities also noted that physical inaccessibility of certain buildings where services are housed—for example, a DV shelter lacking a ramp—can present major barriers to survivors with disabilities or those who have temporary disabilities caused by their trafficking situation (Service Provider Listening Session, March 17, 2023). In addition, there are key ways in which persons with disabilities can end up not getting information or not being able to receive assistance, including a lack of accessible design of websites and forms or insufficient support navigating what can be very complex systems.

Survivors with Children

Listening session participants working with lived expertise and staff working with direct service providers identified housing for families as a major gap, both in the form of housing availability and services to make that housing more accessible. More discussion on the aspects of policy and implementation that present barriers for families with children is in Section 3, but the most common issue raised was the lack of family-sized units, especially for larger families, and that the spaces in shelters or other project-based housing options were designed for only one person. HUD's homeless assistance programs have dedicated resources for families, but the type of resource differs substantially: there are more than twice as many PSH beds for individuals (generally single adults) relative to PSH beds for families, but there are more RRH beds providing temporary rental assistance to families than single adults (HUD, 2022b). TANF programs in several states have specifically targeted families who are experiencing or are at risk of homelessness; some states are using TANF funds as a short-term bridge toward longer-term rental assistance or to fund wraparound services with another form of housing assistance (Dunton et al., 2021).

Male Survivors and Labor Trafficking Survivors

Discussions with listening session participants with lived experience and service providers working in trafficking-specific service provision repeatedly highlighted the lack of available and accessible services for male survivors and labor trafficking survivors as separate but related groups. Likely a reflection of the fact that limited available data suggest that sex trafficking is more common, and survivors identified by law enforcement and victim service providers are more likely to be female, much of the infrastructure of trafficking service provision functions through organizations that also work in fields like gender-based violence. These kinds of natural partners for some survivors might not feel like the appropriate fit for male survivors or people who have experienced labor trafficking. Some federal grants go to providers targeting labor trafficking, but some funders report that labor trafficking service providers may be especially disconnected from other mainstream homeless assistance and housing resources simply due to a lack of capacity or institutional experience (Washington State Department of Commerce Listening Session, April 24, 2023).

Resources for Survivors in Rural Communities

Service provider stakeholders identified a general lack of available housing and service resources in rural areas (Service Provider Listening Session, March 17, 2023). Where services or affordable housing

resources are available, transportation often becomes an especially important issue because people need to be able to access services, with support like bus passes or help accessing a car, on a regular basis. One listening session participant was a service provider working in a CoC that spanned several counties covering mostly rural land area with a focal urban center. They reported that working with survivors in rural parts of their community was especially difficult because of a general lack of services, which tend to be concentrated in cities. In addition, lack of transportation to and from services or the need to move long distances to access housing are major barriers to survivor stability (Service Provider Listening Session, March 17, 2023). Housing can generally be less expensive in rural areas, but survivors' ability to earn enough to afford it, find housing that is not substandard, or receive the kinds of supports needed to maintain it can be challenging.

AI/AN Survivors and Tribal Communities

Although incomplete information on race and ethnicity in national data sources on trafficking makes understanding the full scope of trafficking experiences among Native survivors difficult, work in other fields of GBV and homelessness suggest that AI/AN survivors are disproportionately impacted by trafficking. The ongoing movement for Missing and Murdered Indigenous Women and Girls has highlighted the issue. Among AI/AN women, 56.1 percent have experienced sexual violence, 55.5 percent have experienced physical violence by an intimate partner, and 66.4 percent have experienced psychological aggression by an intimate partner (LaPorte, 2020). AI/AN experiences of homelessness, and other types of deep housing insecurity—such as living in substandard or overcrowded housing—are also disproportionately high (Petit et al., 2014). The intersectional nature of trafficking and housing insecurity is clear: among a sample of Native women in Minnesota who were survivors of trafficking, 98 percent had experienced homelessness (Farley et al., 2011). Much of the funding to address housing needs in tribal lands comes from HUD's **Indian Housing Block Grant** and for services through FVPSA and **OVW tribal grants**. Many tribes have similar issues with access and availability as rural communities, namely a lack of sufficient resources, though tribal lands are not exclusively in rural communities, and AI/AN people do not exclusively live on tribal lands. The additional complexity of dealing with tribal and nontribal sources of funding, the need to recognize tribal sovereignty, the benefits of spiritual and traditional ways of healing, and the deep and varied cultural histories of 574 federally recognized tribes makes meaningful partnerships with and funding opportunities for culturally and community-specific organizations all the more important (Stark and Hudon, 2020; LaPorte, 2020).

Section 3 – Access to Mainstream Housing and Services

This section addresses Congress’s request for information regarding the effect of any policies and procedures of mainstream homelessness or housing services—that is, housing or services that are generally available for people with low incomes or for a broader target population—that facilitate or limit the availability of such services and accessibility for survivors of human trafficking, including those who are involved in the legal system. It also addresses the ability of mainstream homelessness or housing services to meet the specialized needs of survivors of trafficking, including trauma-responsive approaches specific to the needs of labor and sex trafficking survivors.

Cross-Cutting Issues in Market-Rate Housing Access

Access to market-rate housing, or any housing that is available on the private housing market and is not operated directly by a housing provider, is a major concern for survivors and service providers alike. Throughout the research process, stakeholders of all types frequently cited issues accessing market-rate housing as a barrier to safe and affordable housing for survivors. Barriers to accessing units in the private rental market are a concern for survivors renting on their own and for survivors who have some form of subsidy or are working with a service provider. Any tenant-based subsidy, including HCVs and RRH, or assistance through DOJ, HHS, or any other funder, generally requires tenants to have a lease with a landlord. Landlords often have policies or perceptions related to the specific legal, economic, and social-emotional barriers that survivors often face as a result of their trafficking experience that limit survivors’ access to market-rate housing.

Criminal Records Checks in Tenant Screening

Trafficking survivors often have criminal records due to the nature of their exploitation, which frequently involves forced or coerced criminal activity. Arrests for sex trafficking survivors are commonly for prostitution but can also be for possession of weapons or drugs, and identity theft or possession of false identification documents are common for all survivor groups. Landlords run background checks on prospective tenants, which can result in the automatic denial of an applicant with a criminal history. HUD guidance suggests that these blanket bans on anyone with a criminal record likely violate the Fair Housing Act because of their unjustified discriminatory impact on protected classes (McCain, 2022). Some landlords who claim to consider those applicants with criminal records do not actually give the applicant an opportunity to explain the circumstances of their arrests or offer other mitigating information (Marsh et al., 2019).

In a survey by the National Survivor Network, 90.8 percent of survivors surveyed reported having been arrested, and 40 percent of respondents reported being arrested more than nine times. More than one-half of those arrested believed that all their arrests, charges, and/or convictions were directly related to their trafficking experience (Jacobs and Richard, 2016). Most of these individuals reported that their criminal record has been a barrier to housing. Some state-level criminal record relief is available to survivors. However, this process varies by state, can be lengthy, and rarely provides complete relief. Further discussion of the effectiveness of existing criminal record relief laws is in the following subsection of this report. In addition to more effective criminal record relief, outreach and education to housing providers in the form of technical assistance related to the applicability of the Fair Housing Act to criminal background screenings, as well as the lack of bearing a person’s criminal history has on their tenancy, could open up housing opportunities to survivors.

Credit and Rental Histories

Survivors frequently experience financial abuse as a part of their trafficking experience. Traffickers take out loans and credit cards in their names, accumulating debt and destroying the survivors' credit (Polaris Project, 2022a; CFPB, 2022b). In Polaris's *National Survivor Study*, most respondents reported financial abuse by exploiters, and 31 percent reported "establishing or repairing credit" as a current need (Woldehanna et al., 2023). Survivors may also have negative rental history, with missed rent payments or evictions, resulting from their exploitation. Some trafficking survivors also lack any rental history. Participants in listening sessions repeatedly described credit and rental history checks as a barrier to housing. Landlords often will not rent to applicants with bad or no credit or a negative rental history. With a lack of rental history—common among youth or people who immigrated to the U.S.—landlords will sometimes request triple the normal deposit amount, which can be impossible for many survivors to pay on their own (Service Provider Listening Session, March 17, 2023). Homeless service providers routinely deal with the same issues and commonly use risk mitigation funds, which is a kind of insurance or additional deposit; staffed call lines to address tenant issues; and other incentives (USICH, 2018).

The Debt Bondage Repair Act, enacted in 2021, provides a path to financial freedom for survivors. The law creates a process through which survivors can provide information to consumer reporting agencies and have adverse credit information removed from their credit reports (Polaris Project, 2022c). The Consumer Financial Protection Bureau published a Final Rule in July of 2022 amending Regulation V of the Fair Credit Reporting Act to prohibit consumer reporting agencies from furnishing a consumer report containing adverse information that resulted from certain types of human trafficking (CFPB, 2022a). However, similar to criminal record relief statutes, the process to achieve relief places a significant burden on the survivor because it requires them to bear the financial, time, and emotional costs, including sharing sensitive information about the survivor's trafficking experience, which can be retraumatizing (Polaris Project, 2022a). Consequently, although relief is available, it is not always reasonably accessible to survivors.

Right to Report/Anti-Nuisance Laws

For survivors, safety is an essential part of remaining stably housed. Many cities have local ordinances that punish victims for reporting crime on their property, which can interfere with victims' ability to protect their own safety. Nuisance ordinances, also called disorderly house ordinances or crime-free ordinances, single out properties where alleged "nuisance" activities occur, which can include calls to the police or other conduct such as noise disturbances, assault, harassment, stalking, and many other types of behavior (National Housing Law Project, 2021; ACLU, 2020). These ordinances hold a tenant and/or owner responsible for the conduct through fines, evictions, or other penalties, and they typically apply regardless of whether the tenant was a victim of the nuisance activity. When they are faced with steep penalties as a result of these laws, landlords often respond by evicting the tenant, refusing to renew their lease, or instructing them not to call the police. This kind of exploitative, illegal behavior on the part of landlords can put tenants in the impossible position of choosing between calling for emergency assistance or keeping their homes.

Nuisance ordinances disproportionately impact and are disproportionately enforced against communities of color and individuals with disabilities. As a result, these ordinances may violate the Fair Housing Act and other laws, such as Title VI of the Civil Rights Act of 1964. When they have an unjustified impact on, are selectively enforced against, or are created to discriminate against a protected class, nuisance ordinances subject individuals to discrimination prohibited by the Fair Housing Act (HUD,

Office of General Counsel, 2016). VAWA also provides survivors with protections against nuisance ordinances. Tenants may not be evicted from covered housing or lose their assistance on the basis that they have been victims of domestic violence, dating violence, sexual assault, or stalking (34 U.S.C. 12491). Additionally, the 2022 reauthorization of VAWA provides a right to seek law enforcement or emergency assistance without penalties to one's housing, including for survivors. Depending on the specific ordinance and its enforcement against survivors, it may also implicate the tenant's First Amendment and due process rights (National Housing Law Project, 2021).

Treatment of Trafficking Survivors

Many survivors face negative assumptions, stereotypes, and outright discrimination when they disclose their status as survivors to a potential landlord. Landlords make assumptions about their mental health, whether they can be trusted as a tenant, and whether they are still involved with their trafficker (Service Provider Listening Session, March 17, 2023). During listening sessions, service providers described the work they do with landlords to build trust in their clients. One provider shared that, although having conversations with landlords about accepting survivors as tenants is important, getting the client housed is the priority. As such, they may wait to disclose the person's survivor status until after they are housed (Service Provider Listening Session, March 17, 2023). Another provider shared that landlords are always apprehensive when they learn of the survivor's status, and the service provider must work to educate the landlord. However, this type of one-on-one advocacy with landlords is not available to all survivors. More widespread outreach to and education of landlords aimed at breaking down the myths and assumptions associated with survivors as tenants is critical to opening available housing, assuming that not all survivors will be working with a provider that has the resources to build trust with landlords one by one. Further discussion of the different ways survivors' experiences of discrimination and its influence on their ability to access and maintain safe and stable housing is presented in Section 4 of this report.

Barriers to Accessing HUD Resources and Their Limitations

As summarized in Section 2 of this report, trafficking survivors may be eligible for various HUD-funded housing services, including homeless assistance programs and mainstream HUD programs. In addition to eligibility based on income, some HUD programs have eligibility restrictions based on immigration status. HUD's resources provide a spectrum of housing and services options for survivors, such as emergency shelter, long-term housing, and supportive services. However, those resources can have limitations in their ability to meet the extent and complexity of survivor needs.

Homeless System Issues

Crisis housing or shelter access is one of the most common needs of survivors. As a result, many survivors seek out homeless system resources, including emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing. Although many survivors do access these programs, there are obstacles to their availability as well as their accessibility to survivors. Scarcity of resources results in limiting eligibility to or prioritizing particular populations determined to have the greatest immediate need based on standardized assessment, which may prevent or delay survivors from finding housing options at all. In contrast to HUD's rental assistance programs, which have immigration status restrictions, parts of the homeless assistance system do not ask about immigration status and offer temporary services to anyone as a means to protect life and safety. Even when housing or shelter is available, most housing providers do not employ a trauma-informed and survivor-centered approach

and are not aware of the specific needs of survivors, thus preventing many survivors from successfully accessing housing and services.

Barriers to Shelter

The overarching issue in availability of emergency shelter to survivors in most communities, as with availability of all housing programs, is scarcity. Only 50 percent of the individuals in need of shelter are able to access year-round shelter services (National Alliance to End Homelessness, 2023). Although some communities have unused beds or units on a given night, restrictive eligibility requirements often create barriers for different communities of survivors. For example, families can have difficulty accessing emergency shelter because of a shortage of shelter beds meeting the varied needs of families in crisis. Many family shelters exclusively serve mothers with children—though this practice is prohibited in ESG-funded shelters and would violate fair housing requirements if the shelter is considered a dwelling unit—which likely contributes to the fact that families experiencing unsheltered homelessness are more likely to have two adults with them than those experiencing sheltered homelessness (Skinner and Rankin, 2016; De Sousa et al, 2022). Furthermore, though the practice directly conflicts with statute and HUD guidance on family separations, stakeholders report that family shelters can have age limits for children and often will not accept boys over the age of 12 (U.S. Advisory Council on Human Trafficking Listening Session, June 23, 2022). These obstacles exist within survivor-specific housing too. Shelters specifically serving survivors of human trafficking are uncommon, and most have beds available only for female sex trafficking survivors (Freedom Network, 2020). Similarly, although domestic violence shelters have increasingly begun to serve trafficking survivors, they typically only serve female sex trafficking survivors, and when they allow children, many have age limits (Anthony et al., 2018). These restrictions limit the availability of emergency shelter to exclude families, male survivors, and labor trafficking survivors.

Even when shelter is available, barriers to accessibility can prevent survivors from reaching these resources or feeling safe doing so. Many forms of discrimination, although illegal, frequently occur in shelter settings, both from shelter staff and other residents. For example, discrimination, including in federally funded housing programs based on sexual orientation or gender identity, is prohibited under the Fair Housing Act and could violate HUD's Equal Access Rule, but LGBTQIA+ survivors, especially transgender individuals, experience direct discrimination and may also be discouraged from entering, made to feel unsafe, singled out by staff, or harassed by other residents (Skinner and Rankin, 2016). Even where deliberate discrimination does not exist, the fear of harassment or violence may deter survivors of many communities and identities from seeking access to shelter.

Certain modalities of shelter service provision may be inaccessible to large communities of survivors, even when they are trauma-informed. For example, the rules and structure of congregate settings can be triggering (Covenant House New Jersey Listening Session, October 6, 2022). Many shelters have rules, such as curfews, limited hours of operation, chores, or other mandated activities, that can be retraumatizing for survivors if the rule resembles their trafficking experience (Freedom Network USA, 2017). Another example is a lack of culturally specific or subpopulation-specific housing and services, without which particular racial, ethnic, language, cultural, immigrant, age, or LGBTQIA+ communities may not receive the particular services or service delivery that they need. Therefore, even when shelter is tailored to serve survivors, it may not meet the complex needs of many survivor communities and can deter them from accessing the services at all.

Continuum of Care Prioritization

Communities commonly prioritize their CoC program-funded PSH for people with the highest need, often people who have multiple co-occurring barriers to housing or people experiencing chronic homelessness (HUD, 2015). HUD has also provided guidance to CoCs regarding the development of Coordinated Entry systems designed to improve the efficiency of and fairness in access to resources. Because there are not enough resources to house all people experiencing homelessness, including those who are survivors of trafficking, HUD requires CoCs to develop standards that prioritize people for assistance. However, this prioritization process often results in the failure to prioritize survivors, who, despite their critical needs, often do not meet certain thresholds, such as length of time of homelessness, disabling conditions, or history of stays in places like prison/jail, emergency rooms, or psychiatric facilities.

As noted in Section 1, HUD encourages prioritizing individuals and families experiencing homelessness based on data-driven methods, and in practice, the process of this prioritization often takes the form of a standardized assessment. However, screening tools, such as the VI-SPDAT, often fail to accurately assess the vulnerability and risk factors specific to survivors. For example, this tool does not specifically address risk factors like the need for multiple moves or lost time from work (McCauley and Reid, 2020). As a result, survivors who do have severe service needs may not be prioritized for housing because the assessments do not capture the urgency of the housing need (Henninger, Doelger, and Balchi, 2021; Human Trafficking Capacity Building Center, 2021).

Some communities prioritize PSH individuals and families who are experiencing literal homelessness—meaning that they lack a fixed, regular, and adequate nighttime residence—over people coming from transitional housing or shelters. Other communities prioritize by the length of time that households have been experiencing literal homelessness. Service providers shared during listening sessions that this consideration of how long a person has been experiencing literal homelessness can prevent prioritization of survivors for services, depending on the housing situations they are coming from. For example, if an individual has somewhere to stay temporarily, they may not be considered experiencing literal homelessness by a given provider, and the clock will restart on the length of time homeless for the purpose of prioritization (U.S. Advisory Council on Human Trafficking Listening Session, May 16, 2023).

Similar to CoC-funded Permanent Supportive Housing programs, survivors can be lost in the prioritization process for Rapid Re-Housing. Although HUD does not offer the same prioritization guidance for CoC-funded RRH programs, CoCs tend to adopt prioritization plans that follow the same general principles as they do for PSH programs. For example, under Chicago's current Coordinated Entry Prioritization Plan, households are prioritized based on length of literal homelessness. Only after a tie-in length of homelessness, households are prioritized using the following factors: unsheltered, veterans, vulnerability index score, and domestic violence (All Chicago, 2019). Dallas's Priority Status Guidelines consider priorities in the following order: chronic homelessness, length of stay in homelessness, where homelessness was experienced, vulnerability index score, and disability (National Alliance to End Homelessness, 2017). Minnesota's statewide Coordinated Entry system depends entirely on the vulnerability index score to determine what program a household is referred to (Minnesota Housing, n.d.).

Issues Accessing HUD's Core Rental Assistance Programs

The first portion of this section described how a survivor who had access to housing assistance could still face challenges finding safe and stable housing. This section describes the ways in which programmatic requirements can limit survivors' access to federally funded housing assistance. Survivors face issues of eligibility, navigating the process even when they are eligible, and using housing assistance when they get it.

The Legal Context of Noncitizen Access to Subsidized Housing

Survivors of trafficking who are noncitizens face additional barriers when trying to access federally subsidized housing. A notable barrier that noncitizen survivors of trafficking face is limitation on their eligibility for federally subsidized housing due to their immigration status. Trafficking survivors who are noncitizens have a variety of immigration statuses, ranging from undocumented status to temporary work visa holder to lawful permanent resident. In many cases, these immigration statuses may not reflect a person's experience as a survivor of trafficking. Nevertheless, survivors' immigration statuses are often a result of their experiences with trafficking. For instance, many trafficking survivors are undocumented because they were prevented by their traffickers from obtaining immigration statuses that would have allowed them greater safety, stability, and access to benefits. Further, some trafficking survivors were brought to the United States by their traffickers on an employment or other temporary visa, and the traffickers then allowed that visa to lapse to control the trafficking victim (Cavanagh and Poo, 2017).

Under federal law, persons who are not citizens or nationals of the United States must have specific immigration statuses to be eligible for certain types of federally subsidized housing (McCarty and Kolker, 2023; HUD, Office of Public and Indian Housing, 2022a). Noncitizens with eligible immigration statuses still face barriers to accessing subsidized housing, including issues with language access and misunderstanding by both survivors and housing providers about eligibility requirements of federally subsidized housing programs.

Barriers to Accessing a Trafficking Related Immigration Statuses

Section 1 describes ways for noncitizens who are survivors of trafficking to access immigration statuses that are specifically designed to support victims of trafficking or crime. Although certain immigration statuses are available for survivors of trafficking, not all of those statuses allow survivors to be eligible for HUD-subsidized housing, and survivors face functional barriers in accessing the immigration statuses that allow them eligibility for subsidized housing.

Two types of immigration status—T visas and U visas—frequently came up during listening sessions with service providers, organizations engaged in policy and advocacy work, and people with lived experience of trafficking. **T visas** are available to individuals who are victims of severe forms of trafficking in persons and who are willing to assist in the investigation and prosecution of their traffickers, and **U visas** are available to victims of certain qualifying crimes in the United States—including human trafficking—who have been helpful, are being helpful, or are likely to be helpful to law enforcement in the investigation or prosecution of the qualifying criminal activity and meet other requirements.¹⁵

¹⁵ 8 U.S.C. § 1101 and 22 U.S.C. § 7102 (11)

Having a U visa does not provide eligibility for certain HUD-subsidized housing, whereas survivors with T visas are eligible based on immigration status for HUD-subsidized housing and other benefits, services, and protections (McCarty and Kolker, 2023; HUD, 2022a).

Furthermore, survivors can encounter functional barriers to obtaining these eligible statuses that may prevent access or act as a deterrent to seeking them. First, the processing time for T visa applications is incredibly long, with a current processing time of about 17.5 months (USCIS, n.d.). Service providers working in New Jersey specifically noted that the delay in getting a T visa number during this waiting period limited survivors' ability to access rental assistance programs, and across the board, these delays can make finding housing challenging, depending on individual landlord policies (Covenant House New Jersey Listening Session, October 6, 2022).

In addition, both the eligibility and the application requirements for T visas are complex and difficult for survivors to navigate. In FY 2021, 97 percent of approved T visa applicants had legal representation, meaning that success in obtaining a T visa essentially requires legal assistance (Dahlstrom and Gowayed, 2022). The application for a T visa requires a significant amount of evidence of the survivor's experience, and denials are common even with legal assistance. The denial rate has risen from 18 percent of applications processed in FY 2016 to 42 percent in 2019 and 2020. In 2021, the denial rate decreased, but not significantly, to 38 percent. In the *2020 Trafficking in Persons Report*, legal advocates reported their belief that many applications were denied because of improper interpretation of relevant statutes and regulations, including denials based on unlawful acts that traffickers compelled victims to commit or narrow interpretations of the physical presence requirement (U.S. Department of State, 2020). In 2021, two professors from Boston University's Center for Antiracist Research conducted a national survey of 196 legal practitioners who assist with T visas. Of these, 48 percent reported that their clients had received a denial of their application. The two most common rationales that USCIS provided for denial were a failure to show that the applicant was a victim of a severe form of trafficking (31 percent of responses) and failure to show that the applicant was in the United States on account of the trafficking (42 percent of responses) (Dahlstrom and Gowayed, 2022).

The T visa program is also historically underused. There are 5,000 T visas available annually, but the cap has never been reached. USCIS has received fewer than 3,000 applicants every year (USCIS, 2022). This underuse is likely in part due to the complexity of the application process, which requires the expertise of an immigration lawyer to navigate. In addition, each of the steps in applying for a T visa, which may include screening with a service provider, reporting to law enforcement, filing written forms, and follow-ups for investigation purposes, requires a survivor to repeatedly describe their trafficking experience. All these steps, especially in combination, can be extremely triggering for survivors (Caplinger, 2021). Another aspect of the T visa process that can be a deterrent is the emphasis of involvement with law enforcement. The application requires that survivors engage with law enforcement and comply with their requests in investigating or prosecuting the trafficker. However, many immigrant survivors fear or distrust law enforcement officials. They may believe that if they reveal their immigration status, there is a risk they could be arrested or deported, which may deter them from applying for a T visa (Dahlstrom and Gowayed, 2022).

Criminal Records Restrictions on Eligibility

Although there are more protections for survivors with criminal records participating in HUD programs than there are in the private housing market, many of the same barriers persist. HUD has some control over screening criteria at the PHA level and with owners of HUD-assisted multifamily housing projects.

For example, PHAs may not deny admission based solely on arrest records, and if they deny admission based on a conviction, the household must have an opportunity to dispute the accuracy and relevance of the record (HUD, Office of Public and Indian Housing, 2019). HUD has also announced its intention to issue a Notice of Proposed Rulemaking to ensure PHAs and owners are using best practices in tenant screening, such as no automatic denial based on presence of criminal conviction; disregarding criminal history that does not bear on fitness for tenancy; use of individualized assessments; and opportunity to provide information on mitigating factors (HUD, Office Public Affairs, 2023). However, this rulemaking may not be of assistance to those survivors who have been required to register as sex offenders. Survivors are often prosecuted alongside their traffickers, and many are forced to register as sex offenders as a result of their convictions (NSN, 2019). For those with lifetime registration requirements, registration as a sex offender is a complete barrier to housing programs, including Public Housing, Section 8 Project-based housing, and Tenant-based Housing Choice Vouchers, because PHAs and owners and agents are required to prohibit admission to individuals subject to a lifetime registration requirement under a state sex offender registration program (HUD, Office of Public and Indian Housing, 2012).

Furthermore, although most states have a criminal record relief statute specifically providing relief for trafficking survivors, many of these statutes do not provide complete relief (Polaris Project, 2023). For example, two states offer relief only to survivors who were minors when they were trafficked. Some states restrict relief to sex trafficking survivors or only apply relief to a narrow subset of offenses. Many do not offer relief related to arrests, only convictions, and many offer only sealing or expungement of records, rather than full vacatur, an order which would set aside a judgment entirely. Furthermore, in many states, sealing or expunging records does not provide relief from a requirement of registration as a sex offender (Collateral Consequences Resource Center, 2022). In order for those survivors to access most housing programs, full vacatur or reversal of a conviction is necessary.

Most state criminal record relief statutes do not provide complete relief and require significant time, expense, and potentially retraumatizing efforts from survivors.

Most statutes also require significant time, expense, and potentially retraumatizing efforts from the survivor (Polaris Project, 2023). Some require that survivors appear in person at hearings or be prepared to testify against their traffickers. Others require survivors to state in their motion for relief why facts were not presented in the initial court proceedings. Several also require specific filing fees for clearing criminal records. These and many other provisions, including limited judicial discretion, strict time limits or wait times, and restrictive burdens of proof, all prevent survivors from obtaining complete relief (Marsh et al., 2019). Furthermore, for survivors who have convictions in multiple states, these inconsistent patchwork relief options are incredibly difficult to navigate.

Currently, there is no federal criminal record relief for trafficking survivors. For those survivors with federal convictions, there is no pathway to vacating, expunging, or sealing these records. The Trafficking Survivors Relief Act of 2022, introduced in the House in August 2022, would establish a process to vacate convictions and expunge arrest records that directly result from a survivor's trafficking experience (Polaris Project, 2022b). However, this legislation would not provide relief to many survivors in complex situations. For example, survivors who are prosecuted alongside their trafficker may be considered responsible for some of the operations of the trafficking business and convicted of trafficking charges even though they are victims themselves. The Trafficking Survivors Relief Act would exclude

anyone whose conviction included charges related to trafficking of a minor (Polaris Project, 2022b). By establishing additional processes, such as hearings where survivors can explain the relation of the charges to their victimization along with judicial discretion to determine eligibility for relief, the categories of covered offenses could be broader. Without expanding coverage to cover the complexity of many trafficking situations, many survivors will be ineligible for relief.

Forms and Proof of Eligibility

PHAs, CoCs, and other housing providers often use various paper and/or electronic forms in their application processes. Because these forms are used, in part, to determine eligibility, they can be complex, confusing, or sometimes written in a language that the applicant cannot read. These forms often require submission of proof of eligibility or additional information that can be used to verify eligibility, such as proof of income, identity, and legal status. Such proof can include birth certificates, driver's license or state ID, tax returns, employer and bank information, and other documents or information. A survivor may not have adequate proof of eligibility for many reasons, including leaving or losing documents while escaping their trafficking situation or their trafficker having control over these documents. In fact, a lack of immigration or identification documentation is a factor considered in *identifying* trafficking victims, meaning that it is expected for this population (ACF, n.d.c.). Even when a survivor is able to figure out the process for obtaining the necessary documentation, the process can take a long time. The time lag associated with getting all sources of documentation presents an issue for survivors in crisis.

As noted in Section 1, having to fill out multiple forms at multiple points of entry also presents a hurdle for people trying to access housing and services. Recipients of housing assistance also typically need to recertify their income and family composition annually; failure to recertify can result in the loss of assistance. Such hurdles can cause survivors to lose benefits, based not on whether they still qualify but on their ability to fill out paperwork. These kinds of siloed, duplicative application and recertification processes are present in virtually all levels of public assistance, including vital programs like the Supplemental Nutrition Assistance Program and Medicaid. At minimum, such processes create undue stress, and, at worst, they place low-income survivors at risk of losing benefits that would otherwise help achieve longer-term stability (Wikle and Wagner, 2023).

Waitlists

Housing assistance programs typically have long waitlists. The average wait time for HUD rental assistance is about 2 years, and in many parts of the country, families wait 5 years or more to receive assistance (HUD, Office of Policy Development and Research, n.d.a.; Freedom Network USA, 2020). Therefore, in most communities, PHA resources are ill-equipped to respond to survivors with immediate housing needs. To address long waitlists, PHAs may use preferences to prioritize certain populations on the waiting list. This prioritization may or may not be an advantage for survivors depending on the preference, which may include people with disabilities, people experiencing homelessness, families, victims of crime, or other populations that may or may not overlap with survivors. However, PHAs also have the ability to establish limited preferences for referrals from certain agencies or a group of agencies (HUD, 2023). They can use this option to reach qualified applicants who have accessed programs serving survivors.

One example of how a PHA could implement a preference for survivors is the Chicago Housing Authority's (CHA) Survivors of Human Trafficking Demonstration Program. Beginning in 2016, the CHA committed 60 vouchers—first using HCVs and then later EHVs—to trafficking survivors over a 3-year

period (Chicago Housing Authority Listening Session, February 2, 2023). The vouchers are being distributed through direct referrals from agencies that provide services to survivors of human trafficking. However, even with a dedicated voucher, CHA and its partner Metro Family Services reported it took, on average, 75 days from the point of a referral from a service provider to the housing authority to the receipt of a voucher, and another 128 days, on average, to find a unit. HUD's EHV program—which provides vouchers to people experiencing homelessness, at risk of homelessness, or who are survivors of domestic violence, dating violence, sexual assault, or trafficking—has a median time from voucher receipt to lease up of 93 days.¹⁶ These kinds of timeframes suggest that, although vouchers may be an incredibly valuable source of long-term housing stability, they might not be able to meet short-term, crisis housing needs on their own. Other PHAs may similarly set aside vouchers for survivors or operate a preference to move survivors up the waitlist.

Lack of Linked-Housing Services Funding

Although the primary, most immediate solution to housing insecurity among survivors is greater access to housing, stability is most successfully achieved when housing is paired with individualized wraparound services. Services are funded by many sources, but there is a lack of linked housing and services funding outside of CoC-funded PSH. Many PHAs struggle getting their tenants access to wraparound services that help support stable housing, either as part of a transition into longer-term rental assistance or indefinitely. Providers repeatedly mentioned during listening sessions the great need for services and the inability of providers to access them for their clients (DOJ, Office for Victims of Crime Listening Session, August 9, 2022). One specific example heard was the needs of survivors participating in the CHA's Survivors of Human Trafficking Demonstration Program. Metro Family Services, an organization based in Chicago, is conducting an evaluation of the program, and one of the key findings has been that voucher holders still have a significant need for long-term services (Metropolitan Family Services and Chicago Housing Authority Listening Session, February 2, 2023). Although funding for services exists, that it is often siloed away from funding for housing itself presents a coordination challenge, particularly for PHAs.

Challenge of Funding Shared Housing

Shared housing is when multiple unrelated residents share a single housing unit consisting of common space for use by all occupants as well as separate private space (HUD, Office of Public and Indian Housing, 2021). Shared housing is an emerging model, particularly as a means to address youth homelessness, that allows communities to stretch resources, serve more people, find units in tight housing markets, and provide assistance that better meets the needs of certain groups. Shared housing presents an opportunity to better serve survivors by grouping residents together based on their history and service needs or helping provide rental assistance to survivors who reunify with family or live with friends (Taylor, 2020). However, many of HUD's core rental assistance programs are either incapable of or have major difficulty supporting shared housing arrangements. For example, shared housing is referred to by HUD as one of several "special housing types," and though PHAs may allow vouchers to be used in these living situations, they are not required to. As a result, many PHAs have not established policies allowing vouchers to be used in shared housing. In addition, when PHAs do have shared housing policies, owners may be reluctant to allow this arrangement because it requires that each voucher holder enter into a lease with the owner, leaving only part of the unit covered by a lease if one

¹⁶ Median as of June 15, 2023. https://www.hud.gov/program_offices/public_indian_housing/ehv/dashboard

household moves out (Technical Assistance Collaborative, 2016).¹⁷ Therefore, shared housing has generally been an underused alternative in HUD's programs. If more PHAs were to establish policies for shared housing, this could be a viable option for housing survivors and connecting them with supportive services quickly.

Limitations to Where Housing Resources can be Used

A key aspect shaping whether survivors seek out certain housing resources is where those resources are located. Tenant-based assistance that subsidizes rent in the private market nominally gives survivors more flexibility in terms of where they want to live. However, as noted earlier in this section, those resources rely on landlords in a chosen city, neighborhood, or building being able to accept, for example, an HCV tenant. Furthermore, housing authorities are often limited in their ability to support assisted tenants when it comes to seeking out different places to live within the PHA jurisdiction and can have procedural barriers that make it difficult or impossible to use housing assistance somewhere outside the PHA's jurisdiction. Project-based resources, including affordable developments supported by HUD or temporary/crisis housing operated by VSPs or parts of the homeless system, are necessarily fixed locations. Because of the traumatic nature of trafficking experiences, where people are located can matter greatly. Being near a former trafficker, where trafficking took place, or around the circumstances that led to trafficking risk can be retraumatizing. Conversely, having to move away from family, social networks, and/or communities where a survivor feels safe can also contribute to instability in people's lives. Too often, the housing resources that are available limit survivor autonomy over what is the best location to live in order to foster long-term safety and stability.

Alignment of HUD Programs and Other Systems

Trafficking survivors access services in different ways, but it is common for individuals to first seek out HUD assistance via a referral from another service provider (Clawson et al., 2003). Consequently, handoffs or partnerships between service providers and housing providers like HUD present a particular set of issues for survivors, who have experienced significant physical and psychological trauma as a result of their trafficking experience. HUD-funded entities that survivors encounter rarely use trauma-informed and survivor-centered practices; even when they do, having to repeatedly recount an experience through intake and assessment processes can retraumatize survivors (Freedom Network USA, 2022). As noted in Section 1, a common theme from listening sessions was that multiple rounds of reassessment or eligibility screening as individuals move across programs can be especially retraumatizing, and it can discourage survivors from accessing services at all (Survivor Listening Session, March 7, 2023; U.S Advisory Council on Human Trafficking Listening Session, February 28, 2023).

Data Sharing

One challenge for partnerships between other service providers and HUD relates to sharing data. In the homeless system, organizations that receive CoC and ESG funding must use a real-time administrative database to document the clients they serve. The Homeless Management Information System (HMIS) is shared by all homeless service providers that are not VSPs (HUD, 2020). Generally, VSPs are prohibited from entering clients' personally identifying information into shared databases like HMIS. Instead, they are required to use a comparable database to store client-level data (The Partnership Center, Ltd.,

¹⁷Shared housing may not be appropriate for all survivors because it may or seem to present a safety risk or may be retraumatizing depending on the individual's experience. For shared housing to be a good option for survivors, it should ensure safety and provide continuous support to residents and assistance in forming positive relationships in their shared living space.

2023). Although protecting client information is essential, meeting the specific requirements for comparable databases is very costly and time-consuming for providers with already limited capacity. For example, the database must be programmed with all the data fields for every homeless assistance program, although a VSP will only be collecting information related to the programs for which it receives funding. This level of data collection is costly and confusing for providers. More guidance and technical assistance are needed to help VSPs maintain data collection standards that are consistent with survivor-centered, trauma-informed best practices. VSPs want to give meaningful choice to survivors about the information they share, but providers often feel they may be penalized in the competitive funding process if they have incomplete data (National Network to End Domestic Violence, 2022).

Referrals to HUD Programs – Example of the Family Unification Program

During several listening sessions, service providers stressed the potential value of the FUP and FYI programs for youth aging out of care. The combination of a lack of housing, deep economic insecurity, and frayed social networks leave these youth vulnerable to trafficking. FUP is a HUD program under which HCVs are provided to 1) families for whom the lack of adequate housing is a primary factor in either the imminent placement of a child in out-of-home care or the delay in discharging the child from out-of-home care or 2) youth between 18 and 24 who have aged out of foster care and are homeless or at risk of homelessness (HUD, 2017). FUP is administered by PHAs in partnership with child welfare agencies. The child welfare agency determines initial eligibility and then refers the family or youth to the PHA. The recipient must also meet the HCV program eligibility requirements. Unlike the HCV program on its own, FUP combines housing and services—the PHA provides the housing assistance, and the child welfare agencies must provide or ensure FUP youth have access to supportive services for the first 18 months of participation in the program.

Because of the age range of eligibility, FUP also offers crucial resources to youth who have aged out of care and are survivors of human trafficking. Identifying housing resources that are targeted towards youth and the needs of those aging out of care is often difficult. FUP's use of not only rental assistance, but also supportive services, can be crucial to helping survivors gain independence and to lowering the risk of long-term housing instability and vulnerability to trafficking. As of the writing of this report, FUP is a relatively small program, serving approximately 20,000 households, about 1 percent of the HCV program overall.

Barriers to Other Federal Programs

Programs providing housing assistance that are funded by other sources of federal funding run into the same barriers as HUD programs, particularly when it comes to finding units and landlords willing to rent their units and serving clients with barriers such as criminal records or lack of rental/credit histories. Some of these programs, including OVC's Housing Assistance Grants for Victims of Human Trafficking, have design features that help address challenges with HUD's core rental assistance programs. For example, one of the challenges with HUD's programs is limited funding for activities that support families' ability to lease housing—such as having housing navigators available to survivors or having funds available for security deposits or utility hookups. Some of the non-HUD programs, as described in Section 2, have greater flexibility to allow housing assistance funds to be used for these types of purposes, but they are not able to provide the long-term rental assistance that HUD programs offer.

One common feature across many federal programs, from food assistance and health insurance coverage to HUD rental assistance, is that benefits are often based on income. In multiple listening

sessions, survivors described feeling punished for deciding to work in the formal labor market, increase hours, or accept positions with higher pay as even small increases in earnings could mean they approached income limits that could mean they were ineligible for certain programs. This kind of work disincentive is unfortunately common for many low-income workers when dealing with complex, poorly aligned programs in which additional money earned can mean that benefits are effectively taxed away and lead to benefits cliffs, which means people would be materially worse off earning more because of lost benefits (NCSL, 2022).

Focusing training, technical assistance, communication, and guidance for non-HUD service providers on how to connect survivors to HUD or other affordable options would be greatly beneficial. Similarly, HUD providers need guidance on collaborating with service providers working with survivors, with the broad goal of building to capacity to use programs funded by HHS or DOJ as a bridge to longer-term HUD assistance. Crossing these kinds of programmatic silos has historically been difficult; even cooperation between PHAs and CoCs only for HUD programs is complex. Partnerships among HUD and non-HUD housing programs, however, have great potential to support a more robust continuum of options for survivors, creating co-funded housing and services, or warm hand-offs between housing and service providers as survivors transition from emergency to long-term needs.

Growing Use of Flexible Funding

Recognizing some of the limitations associated with existing policies and sources of funding, some housing providers have begun building more flexibility into their programs, most notably through the expanded use of flexible funding models. The enhanced flexibility can apply to funds provided to an organization or to an individual, but *flexible funding* or *flexible financial assistance* generally means financial support that can be used to address a variety of barriers to safe housing stability for survivors rather than a limited, specific set of uses (Human Trafficking Capacity Building Center, 2021). This support can be provided in a number of ways, including allowing payments to a third party on behalf of the survivor, allowing for a higher share of funds to be used for operations expenses versus just for housing assistance, use of an agency credit card to purchase necessities or services, or cash assistance provided directly to the survivor (Domestic Violence and Housing Technical Assistance Consortium, 2019). Direct Cash Transfer programs are an emerging strategy, particularly among service providers focused on youth homelessness, and research on these programs has underscored the importance of flexibility when assisting a population with a diverse array of needs (Morton et al., 2020). Flexible funding is an important housing strategy because it can be used to prevent immediate crises from snowballing and ultimately resulting in long-term housing instability and homelessness. It can be used toward costs that directly impact housing stability, such as moving expenses, security deposits, or rent. It can also be used for costs that impact housing stability more indirectly, such as transportation, childcare, or other costs that might fall outside of allowable expenses for other programs.

Many state and local agencies have been successful in implementing flexible funding programs that are low-barrier, flexible, and survivor-driven. For example, the Washington State Coalition Against Domestic Violence (WSCADV), funded by the Bill & Melinda Gates Foundation, supported 13 agencies across the state in implementing a Domestic Violence Housing First model. Much of this funding has been dedicated toward survivor-defined flexible financial assistance. These funds are unrestricted, respecting the autonomy and agency of a survivor in identifying the best way to address their household's needs (WSCADV, 2021). The results from this program and others illustrate the effectiveness of flexible financial assistance. After 3 years, 88 percent of survivors from the WSCADV Domestic Violence Housing

First program who received advocacy and flexible financial assistance had obtained and retained stable housing over 24 months. Further discussion of flexible financial assistance program models in Washington State is included in Section 5.

State, local, and philanthropic programs with flexible funding can play an outsized role in the survivor ecosystem because the largest federal programs that offer housing and services typically do not offer full flexibility in meeting survivors' needs. Victim service providers in one listening session with HUD noted that, although OVC funding, such as Victims of Crime Act grants, are particularly flexible in their allowable expenses, HUD funding tends to be less flexible.

Section 4 – Barriers to Fair Housing

This section seeks to address Congress’s requirement for an assessment of barriers to fair housing and housing discrimination against survivors of trafficking who may be considered as members of a protected class under the federal Fair Housing Act, which prohibits discrimination based on race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability (42 U.S.C. §§ 3601 – 3619).¹⁸

Experiences of Discrimination

Trafficking survivors can experience housing discrimination in numerous ways, even though trafficking survivors are not explicitly included as a protected class under the federal Fair Housing Act. For example, survivors can face illegal housing discrimination because of membership in a protected class (for example, race) under the federal Fair Housing Act. Policies that treat survivors differently could also have a disparate impact because of a protected class (for example, sex). VAWA’s 2022 reauthorization empowers HUD to enforce VAWA protections for survivors who are covered by VAWA, including when they are directly targeted by unfair housing practices prohibited by VAWA, in addition to the protections of the federal Fair Housing Act.

Sexual Orientation and Gender Identity

All available evidence suggests LGBTQIA+ individuals are overrepresented among survivors of trafficking, and in many cases their trafficking experience is linked directly to housing instability and homelessness (Wright et al., 2021). Addressing discrimination against LGBTQIA+ individuals prior to their experiences of housing instability, homelessness, and trafficking and using available tools to identify and mitigate experiences of housing discrimination are vital to ensuring safe and stable housing for LGBTQIA+ survivors.

HUD administers and enforces the federal Fair Housing Act’s protections against sex discrimination to prohibit discrimination based on sexual orientation and gender identity (HUD, Office of Public Affairs, 2021). Although HUD continues to strive toward improving protections for the LGBTQIA+ community, LGBTQIA+ individuals face significant barriers to fair housing. LGBTQIA+ youth are at more than double the risk of experiencing deep housing instability and homelessness compared to non-LGBTQIA+ peers (Morton, Dworsky, and Patel, 2018). At the core of this experience is that so many people who identify as LGBTQIA+, especially young people, report having run away or been kicked out of their homes based on their sexual orientation or gender identity (Gambon and Gewirtz O’Brien, 2020). Although some evidence of LGBTQIA+ discrimination in the housing market relies on surveys, rigorous pair-tested research funded by HUD has documented higher levels of discrimination specifically for gay men and transgender individuals, with landlords showing prospective renters fewer units and quoting higher prices (Levy et al., 2017).

¹⁸ Determining when a policy violates the Fair Housing Act is a fact-specific inquiry, and investigations into fair housing complaints are necessary to make the proper determination in each case. Although Congress only required HUD to assess barriers to fair housing and housing discrimination under the Fair Housing Act, survivors may also be protected by other fair housing and civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act.

Disability

Individuals with disabilities face a significant amount of discrimination in the housing market, and they are similarly overrepresented among individuals who experience homelessness and among trafficking survivors. The 2022 PIT count showed that 30 percent of all individuals experiencing homelessness had chronic patterns of homelessness, which includes those who have disabilities and have experienced homelessness for extended periods of time (De Sousa et al, 2022). The total number of individuals with disabilities experiencing homelessness is likely much higher. Traffickers exploit homelessness and other vulnerabilities, such as living in relative isolation and reliance on others to meet basic needs, in targeting people with disabilities. Individuals with disabilities experience violent victimization at rates three times higher than people without disabilities. They also face obstacles when seeking help, including communication, physical, programmatic, or attitudinal barriers (Smith et al., 2015). These barriers contribute to the persistence of housing discrimination against individuals with disabilities despite fair housing protections. According to a 2022 report, discrimination based on disability accounts for more than one-half of fair housing complaints filed (National Fair Housing Alliance, 2022). In many instances, discrimination is also likely to go unreported because of the barriers to seeking help, as well as an individual's lack of knowledge of their protections under the federal Fair Housing Act and the fear of retaliation. Therefore, legal protections are not enough to secure equitable housing access without robust outreach and enforcement efforts. Continuous education of landlords and putting individuals in a position to understand and utilize these protections are essential for ensuring access to appropriate housing for survivors with disabilities.

National Origin

In the human trafficking context, addressing national origin discrimination is especially complex because of the relationship between national origin and immigration status. According to data from the *National Survivor Study*, of those labor trafficking survivors identified through the Trafficking Hotline whose nationality was known, 92 percent were foreign nationals. Of this group, 55 percent of individuals were on visas or had legal status as asylees or refugees (Polaris Project, 2020b). For foreign nationals with temporary work visas or other legal status and those who are undocumented, housing discrimination persists and goes unreported for the same reasons that trafficking goes unreported. Foreign nationals have particular vulnerabilities tied to their immigration status, and a fear of retaliation leading to jail or deportation prevents survivors from speaking out.

Although the federal Fair Housing Act does not specifically prohibit discrimination based on immigration status, the Act can be violated when immigration status serves as a proxy for national origin discrimination, such as when prohibitions based on immigration status are unevenly applied to different groups based on their national origin. In addition, a person's immigration status does not affect their other rights and protections under the Fair Housing Act. Therefore, a landlord's discrimination based on race, color, national origin, sex, disability, familial status, or religion is illegal regardless of the immigration status of the applicant or tenant (HUD, Office of Fair Housing and Equal Opportunity, 2012).

Race and Color

Any discussion of the prevalence or circumstances of discrimination because of race or color by survivors needs to start with the reality of discrimination in the housing market for certain racial groups. A substantial body of rigorous research shows that renters of color, particularly African-American and Hispanic/Latino renters, face meaningful discrimination in the housing market, steering renter

households to segregated neighborhoods (Christensen and Timmins, 2021). This pervasive discrimination has substantial, intergenerational effect, meaningfully lowering annual earnings for African-American and Hispanic/Latino households (Christensen and Timmins, 2023). People of color are also disproportionately represented among people experiencing homelessness. The disparity is most pronounced among African-Americans, who made up just 12 percent of the total U.S. population but 37 percent of all people experiencing homelessness and 50 percent of people experiencing homelessness as members of families with children (De Sousa et al, 2022). This reality underscores a key point, that discrimination and systematic racial disadvantage are drivers of the kind of social and economic precarity that puts people at risk of experiencing trafficking or homelessness in the first place and hampers survivors' ability to maintain safe, stable, and affordable housing.

Revealing Survivor Status

This report's discussions of outreach and assessment in Section 1 note some of the reasons survivors may not self-identify as survivors in their interactions with service providers. The decision of whether to reveal their status as survivors can be difficult for survivors in other settings as well. Even survivors actively working with service providers or those who are connected to housing resources can face discrimination based on their status as trafficking survivors. During a listening session with service providers, one frontline case manager discussed the process of engaging with landlords to encourage renting to clients and reported that her preference was to present clients as "refugees," not trafficking survivors. The case manager's experience was that the landlords she worked with—notably in a very tight, high-cost rental market—could be reluctant to rent to survivors because of perceptions that they would be worse tenants. Such perceptions present a significant challenge to housing providers working with landlords in the private rental market, and such actions may constitute violations of the federal Fair Housing Act or the protections granted by VAWA.

A similarly complex problem can arise with survivors attempting to access aspects of the homeless assistance system. A listening session participant with lived experience in trafficking who also works in service provision and advocacy noted that it can be common for front-line staff to treat survivors differently from other clients (Survivor Listening Session, March 7, 2023). The expert noted that, particularly in the context of the youth homelessness system, staff and management were often seen as providing judgment, not support. An example is the focus of staff on aspects of survivors' trafficking experience (such as interaction with the commercial sex industry, drug sales, or undocumented status) that made them a perceived risk to other clients or the provider, rather than treating them as a whole person with needs worth addressing.

Influence of Housing Markets

Earlier sections of this report have underscored the fundamental scarcity of housing assistance and housing that are affordable to survivors. During listening sessions with service providers, however, those working in more expensive housing markets presented some important additional perspectives on the ways in which survivors experience overt and indirect discrimination. Survivors are often seeking housing—either with some form of assistance or not—at the low end of the rental market. Providers talked about landlords in high-cost areas feeling that they could find another tenant quickly for the same amount of rent or more. That reality creates circumstances in which landlords feel empowered by the market to, at the very least, be skeptical about renting to survivors and, at worst, to overtly engage in discriminatory housing practices.

Another aspect that service providers and people with lived experience talked about was that many survivors ended up in shared housing arrangements—with family, friends, or roommates—and often that meant that the survivor was not the primary lease holder (Service Provider Listening Session, May 4, 2023). These arrangements can create a complex power dynamic in which myths and misconceptions about survivors or outright discrimination can shape whether someone can get housing or safely and stably stay in the housing they have.

Awareness of Rights and Protections

Working through the personal trauma of a trafficking experience is complex on its own, but navigating housing assistance or the private market can have its own challenges. Survivors are particularly vulnerable to housing discrimination in the marketplace because they are often disadvantaged and, as discussed in other sections of this report, may be unaware of their rights or afraid to report the discrimination they face because of fear of retaliation or other consequences for reporting discrimination. Survivors are often influenced by the fear that they will be treated differently, judged, or re-exposed to the kinds of coercion, force, or abuse that defines a trafficking experience. Service providers and listening session participants with lived experience talked about the destabilizing influence that fear of losing housing can have.

Concern about being able to afford housing is a constant undercurrent, but provider and experts talked specifically about the power landlords had over survivors and the triggering response the exertion of that power could evoke. Multiple participants talked about survivors being unwilling or afraid to report discrimination, threats, abuse, or basic failure to uphold terms of a legal lease. A provider talked about landlords raising rents when they found out their tenant was a survivor, and several listening session participants reported survivor tenants living in units with issues like unresolved maintenance problems, damage, or mold—conditions that were exacerbated when tenants either were afraid to raise those issues or did not receive an adequate response after raising the issues.

Earlier sections of this report have discussed the rights that survivors who are foreign nationals have in this country and some of the ways in which those legal protections can have real gaps. For example, undocumented survivors may not know they have visa options, these protections can be slow, and, most relevant to this discussion, landlords may not be aware that survivors have legal protections. One service provider talked about the circumstances facing immigrant and foreign national survivors. In their housing market, different cultural and linguistic communities often shape where a person is able to rent or is comfortable renting; sometimes survivors only seek out landlords from their cultural, ethnic, or linguistic group based on referral networks within their community. A survivor has no reason to only seek housing in one community or with a landlord who speaks their primary language, but the intersection of complex rules, insufficient housing assistance resources, and a general lack of awareness of these rules can create a de facto discriminatory effect.

Critical constraints in getting these issues addressed are that survivors may be unaware of their protections under the law, they may be unwilling to come forward to report those complaints, and the matters may be sensitive and require a nuanced, trauma-informed approach to ensure that the survivors feel comfortable participating in a complaint process. Often, survivors or service providers working with survivors rely on legal aid or other local organizations who specialize in tenant protections, many of which have their own resource constraints and are not trained to specifically address the needs of survivors who could benefit from their assistance.

Source of Income

Although not an explicitly protected class under the Fair Housing Act, protections against discrimination based on because of the renter's source of income (SOI) are in place in many jurisdictions around the country. SOI laws or ordinances are in place in 19 states and the District of Columbia as of January 2022 (Poverty & Race Research Action Council, 2023). These laws are most commonly designed to prevent discrimination against people using federal rental assistance programs like the HCV program, but they are also used to prevent discrimination against people who pay for rent using other public benefits like TANF or Social Security. A service provider in California, where a ban on SOI discrimination is in place statewide, noted that many landlords still expressed hesitation or outright resistance to leasing a unit with a service provider contribution funded by a DOJ grant. Similar situations regularly occur with service providers working with individuals experiencing homelessness where tight rental market conditions, persistent myths, and outright discrimination keep many people who have housing assistance unhoused (Khouri, 2022). Fair Housing Act protections may also be available when source of income is used as a proxy for discrimination on the basis of another protected class, such as race or disability.

Section 5 – Best Practices in Housing and Service Delivery

This section addresses Congress’s request to determine housing and service best practices for survivors. It also presents available evidence of the effectiveness of promising housing models and the infrastructure considerations for housing, emergency rental assistance, and service-delivery models that are specific to labor and sex trafficking survivors.

Increased Resources for Housing and Services

HUD’s mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Central to that mission is the idea that everyone can benefit from access to safe, stable, and affordable housing. The evidence from the research literature and the extensive stakeholder engagement conducted for this study have consistently shown that expanding the availability of affordable housing resources overall would benefit survivors and individuals at risk of trafficking. Addressing the fundamental scarcity of affordable housing would go a long way to addressing the personal and economic situations negatively impacting survivors.

Recognizing that more housing and service resources are needed overall, this section examines the kinds of program models, service approaches, and key principles of service provision that are meeting the needs of survivors. Many of these promising housing or service delivery activities do not focus on serving trafficking survivors exclusively. Instead, they serve as a critical demonstration that ensuring safe, stable, and affordable housing cannot just be the responsibility of one grantee or program—it needs a system-wide approach.

Addressing the fundamental scarcity of affordable housing would go a long way to addressing the personal and economic situations negatively impacting survivors.

Trauma-Informed Service Delivery

One of the most consistent themes in conversations with stakeholders and in reviewing the available literature has been

the importance of a survivor-centered and trauma-informed approach to service delivery. Through documents like the National Action Plan to Combat Human Trafficking, the federal perspective is clear that housing programs should seek to understand the vulnerabilities and experiences of survivors and place a priority on restoring survivors’ feelings of safety, choice, and control (The White House, 2021). According to the U.S. Advisory Council on Human Trafficking, being trauma-informed means focusing not only on the event of trafficking itself but also on the whole person and their environment. Effectively working with survivors means focusing not just on the treatment of trauma but on fostering the possibility of well-being using a healing-centered approach (Advisory Council on Human Trafficking, 2022).

In the context of improving access to housing programs in particular, stakeholders consistently highlighted the value of policies or programs that lower barriers to resources. This is broadly consistent with the Housing First model in the homelessness and domestic violence fields. Adherence to Housing First and the Domestic Violence Housing First model in particular focuses on getting survivors into stable housing as quickly as possible and providing the necessary services to support their safety and stability. Whether programs are consistently adhering to these overarching principles in practice can be subjective, but it is important to reinforce the broad goal of fostering choice and autonomy through policies, guidance, training, and technical assistance.

Culturally Specific and Language-Specific Service Delivery

As noted in Section 1, culturally specific service providers, or organizations with specialized experience providing community-based services that include culturally relevant and linguistically appropriate services and resources, play a key role in housing and service that meet the needs of survivors. In two listening sessions, leaders from service providers in Washington, D.C., and Chicago who were directly connected to sources of federal, state, and local dollars for housing assistance emphasized that their programs often are not the front door through which trafficking survivors enter. The larger, more well-funded and well-connected organizations often rely on a network of culturally specific providers to share information, provide referrals, and deliver services to survivors. Meaningful partnerships that, while still complying with civil rights requirements, center on culturally specific providers and the survivors they serve include dedicated or shared resources and allow for contributions to program design and implementation that are critical to more effectively reaching and serving all survivors.

Dedicated Housing Resources

Whereas the primary barrier to housing access is scarcity, housing resources dedicated to survivors is the best way to ensure availability and accessibility of housing for survivors. This dedicated funding can take many shapes, including grants, set-asides, preferences, or sponsor-based housing assistance.

Direct Grants

Two examples of grant models are DOJ's Office of Victims of Crime's Anti-Trafficking Housing Assistance Program and Washington State's Human Trafficking Outreach and Services grant program. OVC's Anti-Trafficking Housing Assistance Program provides grants to housing services and anti-trafficking organizations for three purposes: 1) to develop organizations' capacity to provide housing assistance for trafficking survivors; 2) to enhance access to housing assistance for human trafficking survivors; and 3) to provide organizations with housing training and technical assistance (OVC, 2023). OVC's trafficking housing program was established in FY 2020 and made 73 awards that year totaling just over \$35 million. In FY 2021 and FY 2022, OVC made an additional 47 awards for a total of nearly \$32 million.

Washington State included \$3 million in state general funds for its Department of Commerce in FY 2023 to provide housing assistance for trafficking survivors. The appropriation required that the Department allocate funding through contracts with service providers, which are required to use at least 80 percent of the funds for housing rental assistance payments and the remainder for operation costs, including services addressing common barriers to acquiring housing. The program is low barrier, requiring no data entry unless individuals are receiving support from another grant program. The program also places no limit on the number of individuals to be served or the number of months of rental assistance. As of March 31, 2023, almost 500 individuals had received rental assistance through the program.

Set-Asides or Preferences

Another method of providing dedicated housing resources to trafficking survivors is through set-asides or preferences. Previous sections of this report have described the CHA's Survivors of Human Trafficking Demonstration Program. Through this program, CHA set aside 60 housing choice vouchers over a 3-year period to provide housing assistance to individuals referred from agencies providing services to trafficking survivors (CHA, 2018). Preliminary analysis of the program shared with the study team suggests that the program led to an increase not only in housing stability but also greater family stability and supportive social networks and progress in addressing immigration issues. However, service providers have noted that voucher holders would benefit from access to services on an ongoing basis,

including behavioral health and family services. In addition, during a listening session, a different service provider working in Chicago expressed concern that CHA had not coordinated sufficiently with smaller service providers, including many community-based and culturally specific entities with more established relationships with certain groups of survivors. CHA and their partners noted that human trafficking survivor voucher holders struggled to find landlords who would accept the vouchers. Partnerships with providers who have relationships with landlords or community networks to search for units would be beneficial.

Master Leasing

Another promising model for operating housing resources, particularly long-term rental assistance options, is the use of a sponsor-based housing assistance model. This model involves a housing or service provider master leasing a unit, meaning the service provider is the lease holder of a unit, in contrast to models of assistance in which the assisted tenant is the lease holder. These arrangements can be appealing to landlords because the service provider assumes the risks of damage to units, pays rent on time, and often pays to hold units for the periods during which one assisted tenant moves out and another moves in.

PHAs with Moving to Work authority can support this kind of model using a Local Non-Traditional program (HUD, Office of Public and Indian Housing, 2022). The Oakland Housing Authority (OHA) has operated a sponsor-based housing program for transitional-aged youth aging out of foster care since 2010. The OHA youth program funded rental assistance through a service provider sponsor, which allows for a great deal of flexibility, including making rental payments for youth who are living with roommates in shared housing or even with extended family (Khadduri and Savidge-Wilkins, 2014). For other housing and service providers, these arrangements can be complex to build and manage and can require sophisticated housing capacities. However, this model can be a unique way to work around housing search and discrimination issues and could allow survivors to access housing quickly.

Flexible Financial Assistance

As discussed in Section 3 of this report, flexible funding can support survivors and address critical needs that go beyond emergency housing costs that could make someone housing insecure or cannot be funded by other housing and services programs. This kind of assistance can prevent these issues from accumulating and resulting in long-term housing instability and possibly homelessness. In addition, these programs center survivors by granting them autonomy to determine how to use funds for their most critical needs. Section 3 discussed the expanded use of more flexible funding in federal government programs, and various pilot programs funded by private organizations and public-private partnerships also illustrate how effective flexible financial assistance can be in maintaining long-term stability.

The first example is the District Alliance for Safe Housing's Survivor Resilience Fund. The Fund was created in response to domestic violence survivors' need for immediate funds, which could help them avoid homelessness, and the lack of a low-barrier, trauma-informed approach in the existing emergency funding programs in Washington, D.C. (District Alliance for Safe Housing, 2015). The funding was available to cover expenses such as home security measures, utilities, moving costs, legal or medical expenses, childcare, car repair, and rent (District Alliance for Safe Housing, n.d.). Survivors who applied for grants were invited to participate in a longitudinal study. During interviews, survivors often shared that the grants were essential to maintaining their housing stability. Other themes were that the funding

was provided much quicker than in other emergency funding programs and that it also increased the well-being of the survivors' children (District Alliance for Safe Housing, 2015). Six months after receiving the grant, 94 percent of survivors remained stably housed (District Alliance for Safe Housing, n.d.).

Another example is the LGBT Center of Central Pennsylvania's Flexible Funding Pilot Project. The Center focused its pilot on participants in its GLO program, which supports LGBTQIA+ young people of color aged 14–34, particularly men and trans women. The program offers various services and resources, including housing and financial support. Prior to the pilot, this support came from other funding sources, and participants were required to complete an application and submit supporting documentation for all requests over \$200. The pilot project supported a total of 30 participants through payments to or on behalf of participants through credit card payments, gift cards, gas cards, and checks. Because of the use of gift cards, most of the disbursements were made immediately upon request. Funds were disbursed 127 times and covered expenses such as rent, move-in costs and deposits, transportation, basic needs, emergency hotel stays, utilities, and general debt assistance. Data from the pilot showed that the funds improved participants' well-being and helped them remain in their homes, move from homelessness to temporary or permanent housing, or move from one home to another (Oluwafunmilayo Ayeni and Hampton, 2023). In addition to the positive outcomes on housing stability, participants in flexible funding programs consistently note that the survivor-driven nature of this model builds trust and makes them feel heard and their needs affirmed. Frontline staff developed new methods of assessing and supporting the autonomy of participants to find out how best to put these flexible resources to work. The participant-centered nature and positive results in housing stability could be a vital resource to similarly support human trafficking survivors.

These examples show the breadth of what can be supported with flexible assistance models, whether it be critical costs that could lead to housing insecurity or types of housing not usually supported by federal programs like shared housing or reunification. Taken together, these findings support the idea that flexible assistance can be a valuable tool to provide truly survivor-centered housing.

Housing Navigation and Accessing Resources Quickly

Navigating the housing system is difficult not only for survivors but also for service providers, especially when trying to meet the housing needs of individuals escaping trafficking who need to access safe shelter quickly. Throughout conversations with stakeholders, several best practices emerged for helping survivors navigate the housing system. These practices focus on providers engaging and building relationships with landlords, educating them, and fostering trust. As discussed previously, landlords' acceptance of survivor tenants is a primary barrier to housing. If they are willing to rent to the survivor, many landlords require additional records or documentation, delaying the process and putting the survivor at risk of losing the unit. That barrier is why established relationships with landlords is critical to a provider's ability to immediately connect a survivor to housing. One provider discussed hosting landlord luncheons to form connections and give landlords a better understanding of human trafficking in their communities and the needs of survivors (DOJ, Office for Victims of Crime Listening Session, August 9, 2022). Other providers noted building up a database of landlords who are accepting and supportive of survivor tenants and/or who reach out when they have had available units. Landlords are also more accepting when providers maintain communication and support throughout the tenancy, assisting survivors with their ongoing needs as well as helping to solve any issues that arise. Ideally, the service providers would be able to hire housing navigators whose positions are dedicated to building these relationships and bridging the gap between their clients and landlords.

Other practices use technology to assist providers in accessing available housing quickly. One recent model for ensuring quick access to safe shelter for survivors is Safe Stays by ReloShare, which is a hotel-booking platform for social service agencies. Created to address the scarcity of shelter spaces for domestic violence victims during the COVID-19 pandemic, Safe Stays allows service providers to instantly book available hotel rooms at more than 15,000 hotels across the country (ReloShare, n.d.a.). The service is low-barrier, allowing guests to book and check in without a photo ID, credit card, or deposit, and many locations allow booking under an alias. The program's 24/7 support team works with the hotel and the service provider throughout a guest's stay, confirming check-in and resolving any issues that arise (ReloShare, n.d.b.). Safe Stays also allows providers to book flexible group hotel blocks when they have a need for stable longer-term housing options. During that time, the agency has ownership over the block and can move clients in and out as needed. For example, one Chicago provider used this option to book 50 rooms with 100 beds in a hotel for 12 months to be used as shelter overflow. This model allows service providers to access safe, alias-approved hotel rooms for survivors in minutes.

Youth-Specific Approaches

Youth survivors have unique trauma experiences and service needs. Despite the number of programs dedicated to serving youth experiencing homelessness, stakeholders repeatedly noted the difficulty in accessing youth housing and services, particularly those that are sufficient to meet the complex needs of youth survivors. They identified best practices for housing programs specific to youth survivors, particularly LGBTQIA+ youth, who are overrepresented among survivors of trafficking, especially those experiencing homelessness. A theme of these practices is centering survivors and giving them agency in co-creating the spaces meant to serve them. Examples of these approaches in practice include asking residents to collaboratively develop residential agreements because they understand their needs best to protect themselves and avoid punitive rules (True Colors United Listening Session, September 14, 2022). Involving residents in defining their space creates a sense of security and ownership over the program. Programs targeting youth survivors should be tailored through affirming mental health services.

Specific models of housing programs are recognized as best practices for youth.¹⁹ One model praised by stakeholders is Specialized Therapeutic Foster Care, which is a treatment program in which therapeutic foster parents provide in-depth supports to youth experiencing significant trauma and/or mental health challenges. This program can be specifically designed to meet the needs of youth survivors. For example, in Florida, the Citrus Helping Adolescents Negatively Impacted by Commercial Exploitation Program is a Specialized Therapeutic Foster Care program that provides individualized clinical treatment centered around trauma-focused care, cognitive behavioral treatment, and motivational interviewing. It offers these services both to survivors residing in a specialized therapeutic foster home as well as other youth survivors in the community (Citrus Health Network, n.d.).

Similarly, another model is specialized group homes, which are residential programs that provide youth with a structured, therapeutic environment. It allows them to live with other youth who have similar experiences and needs and can be designed to meet the unique service needs of youth survivors. A more short-term intervention for youth is a host home, in which families act as hosts for youth in need

¹⁹ Programs must not prohibit pregnant or parenting youth, as this would likely violate the Fair Housing Act's prohibition on discrimination because of familial status. Moreover, programs receiving Federal financial assistance must comply with the Age Discrimination Act. The examples provided in this report have not been vetted for compliance with these requirements.

of temporary emergency shelter. This model is a promising option, particularly for those youth who are not eligible for other types of housing assistance or in areas where there is limited youth-specific crisis housing (Henderson et al., 2022). Each of these models allows youth to reside in a safe environment while accessing services to address their individual needs.

Supportive Housing

As stressed throughout this report, combining affordable housing with survivor-centered, trauma-informed, and individualized services is often the key to long-term housing stability. Supportive housing pairs housing with wraparound supportive services, creating a solution that can respond to survivors' unique needs. Supportive housing was initially designed to support those with complex needs, particularly those with severe mental illness or a history of substance abuse. It has since been adapted for use with a range of vulnerable populations, including trafficking survivors. More research exists relating to how this model supports survivors of domestic violence, but many of these ideas can be extended to trafficking survivors, and service providers have noted a need for more dedicated PSH resources for trafficking survivors (District Alliance for Safe Housing Listening Session, December 16, 2022). Best practices within the model stress the importance of involving survivors in program design and offering voluntary services that are flexible enough to meet diverse needs. Research suggests that services should be offered both on-and offsite and should focus on practical skills, practical support, and mental health support. The physical and programmatic design should foster community (Vukovic et al., 2021). One example of this model specifically directed to trafficking survivors is Phoenix Starfish Place in Arizona, a 15-unit apartment complex that serves women who have experienced sex trafficking and their minor children. The design of the supportive programming was informed by the community's survivor leaders, and services include case management, therapeutic groups, life skills and parenting classes, cooking and nutrition, and mindfulness, with services offered onsite (City of Phoenix Housing Department, 2022).

Role of Technical Assistance

Technical assistance can be a catalyst for improved service delivery because it helps providers build their knowledge, skills, and capacity to serve their clients. For example, the Freedom Network's Housing Training and Technical Assistance Project funded by OVC provides training and resources to assist OVC funded Housing grantees in identifying and accessing housing options for survivors. The Project's expert consultants, including its Survivor Advocacy Panel, support the creation and delivery of content to service organizations (Freedom Network USA, n.d.). Similarly, the Family and Youth Services Bureau's Runaway and Homeless Youth Training and Technical Assistance Center provides technical assistance for all federally funded runaway and homeless youth grantees. It has published a variety of digital resources and learning modules to assist programs in building capacity at the intersection of human trafficking and runaway and homeless youth (RHYTTAC, n.d.). Technical assistance provides organizations across those different systems and serving various communities with the tools to build their capacity in identifying and responding to the complex needs of survivors.

Involvement of Leadership and Voices of Lived Experience

At various points, this report has discussed the ability of smaller organizations to provide services to survivors because of the trust and relationships they have built within the community, and the need to direct resources to these organizations so they may build capacity. Also important is building the capacity of larger housing and service provision organizations to service populations with particular needs, such as survivors. Approaches to building this capacity involve 1) ensuring that service providers

and people with lived experience are included meaningfully in the decisionmaking process at these organizations, and 2) targeting outreach about survivor issues to key leadership at organizations like CoCs and PHAs.

A key component to survivor-centered and trauma-informed service delivery is centering the choices and autonomy of survivors. The same is true when thinking from a systems perspective. The voices of survivors and the service providers working closely with them should be included in the planning and decisionmaking processes of larger housing and service systems. The CoC program has incentivized, through points on their annual Notice of Funding Opportunity, the presence of people with lived experience on boards and in decisionmaking processes. People with lived experience can play many roles within CoCs, including storyteller, advisor, grantee, partner, and staff (Akers et al., 2023). Employing these individuals in a variety of roles in an organization allows their expertise to be used at every stage of decisionmaking, from helping providers understand what is and is not working to designing research and shaping the service delivery to joining organizations as staff. For example, Miami has CoC-level coordination and has a dedicated survivor working group focused on the unique needs associated with trafficking experiences.

HUD has prioritized involving PHAs in efforts to prevent and end homelessness and has learned from those efforts the importance of having strong support from PHA leadership as well as a clear vision for how prioritizing homelessness translates into PHA policies and practices (HUD, 2021b). Prioritization of particular populations enables staff to make the kinds of systems changes needed in core HUD programs to better serve people coming from other systems—for example, CoCs in the case of prioritization of people experiencing homelessness. One way these approaches have been married in an especially effective way is a Canadian program called Street Level Women at Risk. It formed as an interagency taskforce of 26 partner agencies in local and provincial government and nonprofit organizations, with the purpose of supporting women engaged in commercial sex and experiencing chronic homelessness. Prior to beginning service delivery, the collaborative completed an extensive community consultation to understand the experiences and needs of the community and developed a community plan serving as the foundation of service delivery (Street Level Women at Risk, n.d.). Although much of the Canadian health and social services landscape is not comparable to the United States, the effort underscores the importance of intentional planning even before service delivery starts, centering of voices of lived experience in planning and ongoing decisionmaking and active meaningful communications in planning and service provision across systems.

Integrating Other Institutional Partners

For multiple reasons, survivors and individuals who are at risk of trafficking are often distrusting of law enforcement. Many have been arrested in connection with their trafficking experience. Depending on their immigration status, some have a fear of deportation. However, law enforcement efforts to more meaningfully engage with at-risk individuals and survivors have the potential to identify more survivors and aid in prosecution of traffickers. As a protective factor, focus on housing and services over incarceration lowers the risk for both those at risk of trafficking and survivors at risk of re-trafficking. One example of prioritizing housing in this way is the Santa Clara Housing Pilot, which focused on the housing needs of girls and gender-expansive youth with involvement in the juvenile justice and child welfare system (Dholakia, 2023). Given the experiences of trauma, abuse, and instability in their lives, this group should be considered at risk of being exposed to trafficking. The Vera Institute of Justice studied implementation of a housing model that included a continuum of housing options, including shelters,

shared housing, host homes, and a single site house with dedicated beds and onsite staff. Vera found that this pool of housing resources reduced the number of girls and gender-expansive youth who stayed in custody. Based on the success of the pilot, Santa Clara County expanded housing resources and launched a cash assistance model through a guaranteed monthly income of up to \$1,000 to young people who have experienced trafficking and sexual violence. The Santa Clara Housing Pilot is a valuable example of bringing institutions that are not generally thought of as housing-focused into the housing and service provision ecosystem; it also demonstrates how government focus on service provision over criminal justice involvement increases stability and decreases risk factors.

For survivors specifically, achieving housing stability not only impacts their overall well-being and likelihood of re-trafficking, but the benefits of stability reverberate out to anti-trafficking efforts generally. Services should always be survivor-centered and not with the sole purpose of serving investigatory and prosecutorial efforts. However, when a survivor receives services and resources that meet their needs, allowing them to feel safe and supported, they are often more capable and willing to present evidence and testimony in the prosecution of traffickers (OVCTTAC, n.d.a.). To achieve this, law enforcement must have the same survivor-driven, trauma-informed approach that is needed for effective service provision. One approach to trauma-informed law enforcement is the creation of multidisciplinary task forces employing the Enhanced Collaborative Model. This approach brings together law enforcement, prosecutors, and service providers with the goal of implementing survivor-centered approaches to identifying survivors, providing services, and investigating and prosecuting traffickers. A recent study has shown that this model may remove barriers to information sharing, breaks down misconceptions, and increases willingness to collaborate, which may result in more efficient service delivery as well as increased investigations and prosecutions. These results illustrate that when law enforcement collaborates in survivor-centered approaches, it not only leads to increased stability for survivors but can assist antitrafficking efforts more broadly (McCoy et al., 2022).

Conclusion

Deep housing insecurity and trafficking are interconnected. Experiences of homelessness and exposure to trafficking are caused by a similar set of conditions, including economic hardship, underlying personal vulnerabilities, fragmentation of social networks, and personal crises. They are also reinforcing phenomena: homelessness and housing instability can both contribute to or result from trafficking experiences and the instability associated with some causes of homelessness can also increase risk of exposure to trafficking. Access to affordable housing and services can help foster stability across the board, potentially serving as a protective factor for survivors experiencing deep housing insecurity and homelessness.

No one-size-fits-all approach to successful outreach and assessment exists. Methods vary considerably based on the survivor populations being served, the set of programs and systems that are available to survivors, and the trust survivors have in these systems. Validated assessment tools that can identify survivors among certain target populations are an important component, but just as important are efforts to engage siloed housing and service providers and to better coordinate mainstream housing and service systems with providers who are already working with survivors. In addition, policymakers and service providers developing outreach and assessment approaches intended to identify and meet the needs of survivors must recognize that these efforts may inadvertently cause survivors to jump through repeated hoops, such as redundant eligibility screenings and intake interviews, that can both be burdensome and retraumatizing for survivors.

Survivors can access many types of housing resources and services, but the primary constraint of survivor-specific programs, the homeless assistance system, and general affordable housing programs is that there are not enough resources to serve everyone who could benefit. In any given community, the type of housing assistance or shelter available and how that assistance is structured are the primary drivers of what is functionally available and accessible for survivors.

The policies and procedures of these housing and service resources also play a major role in whether and how survivors can access support. Stakeholders consistently identified issues accessing housing on the private rental market as a barrier to stability even when survivors are receiving some form of rental assistance. Programs of all types struggle to find landlords willing to rent to survivors because of criminal records or other issues with credit, rental history, or immigration status. Survivors also must navigate complex, siloed programs to receive the kinds of housing and services they need, and more must be done to better align the programs already in place.

Survivors often face unique barriers to fair housing both in the private market and within housing and service systems. The survivor community is disproportionately made up of groups that face systematic discrimination based on their race, color, national origin, sex (including sexual orientation and gender identity), and other protected characteristics. Survivors may also experience discrimination on factors that are proxies for discrimination on a protected class basis, such as immigration status. Beyond that, survivors can also be targets for exploitative behavior related to their housing instability because of fear of losing housing, revictimization, or having to engage with law enforcement.

This research identified providers around the country operating successful program models for survivors. The most promising programs share a consistent approach: a commitment to trauma-informed, survivor-centered service delivery that values the autonomy and choice of survivors. This approach is best reflected in the growth of programs targeting trafficking survivors that use a flexible

financial assistance model or offer a continuum of housing options and provide for wraparound supportive services tailored to each survivor's needs and circumstances.

Next Steps for Research and Policy

This report can serve as a general assessment of the issues driving deep housing insecurity and homelessness among survivors of trafficking. The report identifies several important opportunities where additional resources, technical assistance, guidance, and coordination have the potential to greatly improve outcomes for survivors. More research is needed, however, in several key domains:

- Better data on the incidence and prevalence of trafficking nationally would help everyone from federal policymakers to direct service get a clearer picture of the scope of survivor needs.
- Case studies and implementation evaluations are available for several approaches to providing housing and services to survivors, but more work in this area, including attempts to either replicate or scale promising models, would contribute to the emerging evidence base.
- Rigorous evaluations that show program impacts using a counterfactual group, such as the evaluation of the Domestic Violence Housing First program model in Washington State, are especially valuable in understanding what programs work and for whom.
- More intensive qualitative data collection, including larger samples of survivors and people at risk, using structured protocols, and data collection over time, would help better understand why some approaches work and some do not.
- Focused research and engagement with groups that may be overrepresented among trafficking survivors or underrepresented in the existing literature—for example, foreign nations, survivors, AI/AN survivors, male survivors, and survivors of labor trafficking.

The [Action Research framework](#), discussed in OVC's Human Trafficking Action Research Toolkit, lays out some important foundational principals for future work in this field, including translating knowledge into practical, contextual policy change and ensuring that research benefits the organizations and communities taking part, not just the researchers themselves (Henninger, Lowry, and Tripathi, 2020).

This report's findings are intended to inform an ongoing discussion involving policymakers, advocates, service providers, and people with lived experience. Although developing a full set of recommendations will require more research, discussion, and stakeholder engagement, the findings of this report suggest several potential ways to improve availability and access to housing and services for survivors:

- More support to foster collaboration and streamlining across systems, such as tools on inter-agency cooperation, leveraging resources, and navigating policies and procedures.
- Increased survivor-specific housing resources, particularly to increase access to long-term housing assistance and wraparound services when needed.
- Investment in flexible funding sources, either through considering how major funding sources could be made more flexible or through more funding for the programs that currently have the most flexibility.
- More meaningful engagement, partnership, and funding to directly support culturally specific and community-based organizations.
- Greater focus on making practical changes to housing assistance applications, eligibility, screening, and intake processes, including with the use of technology, to reduce the traumatizing effects of navigating siloed systems.
- Further clarification to emphasize how protections, such as those under VAWA, protect and apply to survivors.

- More inclusion and elevation of people with lived expertise in substantive areas of program design, policymaking, and leadership.
- Increased emphasis on trauma-informed, survivor-centered service provision approaches within existing housing and homeless assistance providers.
- Providing education and training targeted to service providers and housing program staff on survivors' rights and housing barriers, including housing protections under the Violence Against Women Act and related laws, how to address issues related to criminal records or bad or no credit histories, landlord engagement methods, and the rights of foreign nationals and survivors with trafficking-specific immigration statuses.

In general, the intersection of housing needs and experiences of trafficking is a complex policy issue and a growing field of study. Issues such as insufficient resources and difficulties communicating across siloed programs have been challenges for a long time and are a daily reality for many people trying to navigate housing and services systems. The authors hope that this report provides a foundation upon which research, policy, and practice can collaboratively work to improve access to safe, stable, and affordable housing for all survivors.

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Appendix A – Acronyms

ACF	Administration for Children and Families
AHAR	Annual Homeless Assessment Report
AHTST	Adult Human Trafficking Screening Tool
AI/AN	American Indian or Alaska Native
ARP	American Rescue Plan
CDBG	Community Development Block Grant
CHA	Chicago Housing Authority
CoC	Continuum of Care
CP	Continued Presence
DHS	Department of Homeland Security
DOJ	Department of Justice
DV	Domestic Violence
EHV	Emergency Housing Vouchers
ES	Emergency Shelters
ESG	Emergency Solutions Grants
ESL	English as a Second Language
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FUP	Family Unification Program
FYI	Foster Youth to Independence
FVPSA	Family Violence Prevention and Services Act
GBV	Gender-Based Violence
HCV	Housing Choice Voucher
HHS	Department of Health and Human Services

HOME	HOME Investment Partnerships
HMIS	Homeless Management Information System
HP	Homelessness Prevention
HUD	Department of Housing and Urban Development
HUD-VASH	HUD-VA Supportive Housing
IPV	Intimate Partner Violence
NSS	National Survivor Study
OHA	Oakland Housing Authority
OTIP	Office of Trafficking in Persons
OVC	Office for Victims of Crime
OVW	Office for Violence Against Women
PCWA	Public Child Welfare Agency
PHA	Public Housing Agency
PIT	Point-in-Time
PSH	Permanent Supportive Housing
QYIT	Quick Youth Indicators for Trafficking
RRH	Rapid Re-Housing
SA	Sexual Assault
SOI	Source of Income
TANF	Temporary Assistance for Needy Families
TBRA	Tenant-Based Rental Assistance
TH	Transitional Housing
TVPA	Trafficking Victims Protection Act
UCR	Uniform Crime Reporting
USCIS	United States Citizenship and Immigration Services
VA	Department of Veterans Affairs
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index-Service Prioritization Decision Assistance Tool
VSP	Victim Service Providers

WSCADV	Washington State Coalition Against Domestic Violence
YHDP	Youth Homelessness Demonstration Program

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