

Subject: NAC Comments

Response to request for information on strategies by the National Advisory Committee on the Sex Trafficking of Children and Youth as published in the federal register on August 20, 2020.

Thank you for the opportunity to provide input to the National Advisory Committee on the Sex Trafficking of Children and Youth in the United States (NAC). Casey Family Programs is the nation's largest operating foundation that focuses on safely reducing the need for foster care and building communities of hope for children and families across America. We provide ongoing strategic consultation, technical assistance, data analysis and independent research, and work in all 50 states, the District of Columbia, in two U.S. territories and with more than a dozen tribal nations to assist child welfare leaders in their efforts. Casey Family Programs also works directly with children and families<https://caseyfamilypro-wpengine.netdna-ssl.com/media/2034_CS-Direct-Services-Brochure_fnl.pdf> in our nine field offices to develop and demonstrate effective, practical solutions to safely reduce the need for foster care, improve well-being, and secure safe and lifelong families for every single child in our care.

Based on what we have learned in our work with children, youth, families and communities across the country, we offer the following comments and considerations to the NAC.

We know that child welfare involvement is a response to trafficking in some cases and placement in foster care can make a youth vulnerable to trafficking. However, we have very little and inconsistent national data to understand the problem, making it difficult to develop appropriate prevention activities and provide appropriate trauma informed services. In an effort to get more comprehensive and accurate data and to inform a response, front line staff, law enforcement, and judicial personnel need training and assessment tools to identify victims and gather accurate information. Assessment tools should continuously assess risk of trafficking and service needs among children and youth in the foster care system.

The following are gaps in national data that we believe warrant further consideration and conversation at the state and national level to inform this work:

*Child welfare involvement of children and youth have experienced trafficking, including:

- Placement type, length of stay and type of permanency exit for victims or at risk of trafficking.
- Specialized services for victims and their caregivers would be helpful to inform a more family-centered response. Specifically what types of evidence based trauma informed services are offered, providers (i.e. therapists) and the service duration would be helpful. In addition, such services should be culturally responsive and provided in an equitable manner.
- Previous child welfare involvement and dual status/juvenile justice involvement

*We also suggest being sure jurisdiction disaggregate data by race, age, and gender.

For more information, please see Casey Family Program's Questions from the Field issue brief entitled How can child protection agencies identify and support youth involved in or at risk of commercial child sexual exploitation?<<https://caseyfamilypro-wpengine.netdna-ssl.com/media/20.07-QFF-SC-Sex-trafficking.pdf>>

Engaging youth and families with lived experience in all stages of policy, program, training and development is critical to developing prevention efforts and development of a trauma-informed response. We strongly encourage jurisdictions to frequently consult and engage with constituents to inform policy, programs, data collection and analysis, and staff development/training. For example, the National Foster Youth and Alumni Policy Council has priorities related to reducing vulnerabilities and responding to trafficking and trauma that could inform the NAC, including their priorities on building social capital and quality residential services. Their key priorities related to the work of the NAC are at the links below for your consideration:

Quality Residential Services, see especially #6

http://nationalpolicycouncil.org/sites/default/files/docs/blogs/Quality%20Residential%20Services_Feb.%202020_Final%20.pdf

Social Capital Priority:

<http://nationalpolicycouncil.org/sites/default/files/docs/landingpage/Improving%20Social%20Capital%20for%20Youth%20in%20Foster%20Care%20%281%29.pdf>

Implementing Preventing Sex Trafficking and Strengthening Families Act, P.L. 113-153

http://nationalpolicycouncil.org/sites/default/files/docs/landingpage/Public%20Law%20113_183%20Priorities.pdf

Reducing Vulnerability of Foster Youth to Predators and Sex Trafficking

<http://nationalpolicycouncil.org/sites/default/files/docs/landingpage/Vulnerability%20Priorities.pdf>

Thank you for the opportunity to submit comments. We would be happy to discuss this area of work further. Please contact Christine Calpin, Managing Director-Public Policy at ccalpin@casey.org<<mailto:ccalpin@casey.org>> if you have any questions.

Christine Calpin
Managing Director
Public Policy

P 202.728.2001

C 703.963.2175

F 866.786.0028

ccalpin@casey.org<<mailto:ccalpin@casey.org>>

casey family programs

safe children | strong families | supportive communities

casey.org<<https://www.casey.org/>> | 1200 17th St NW Suite 410 | Washington DC, DC 20036