

**OFFICE ON TRAFFICKING IN PERSONS
COVID-19 FREQUENTLY ASKED QUESTIONS
PART TWO**

PROGRAM ADMINISTRATION

The Office on Trafficking in Persons (OTIP) developed the following Frequently Asked Questions (FAQ) for grantees seeking information regarding grants funded under the Trafficking Victim Assistance Program (TVAP), the Domestic Victims of Human Trafficking (DVHT) Program, the Look Beneath the Surface Regional Anti-Trafficking Program, and the National Human Trafficking Hotline.

OTIP grantees are encouraged to contact their Federal Project Officer (FPO) to discuss programmatic, administrative, or financial questions their organization may have or for further clarification or direction regarding guidance provided thus far.

1. Can grantees screen and deny clients from entering a shelter or program if they have tested positive for COVID-19?

Grantees should consider local and state protocols when determining how and when to screen and deny clients from entering a shelter or program if they test positive for COVID-19.

Under federal law, testing positive for COVID-19 (or having symptoms of COVID-19) may be considered a disability. In most cases, grantees may not deny services to someone otherwise qualified to receive them due to a disability, and the grantee is often required to make reasonable accommodations to allow the individual access to the program.

However, it is not necessary to accommodate the individual if allowing them access to the program would pose a direct threat to the health and safety of others. COVID-19 likely constitutes such a direct threat. Grantees should consider whether there is a way to serve individuals with COVID-19 in a way that mitigates risk to others, such as providing counseling over the phone, quarantining and/or isolating individuals that may have potentially been exposed to COVID-19 in shelter-based programs. If there is no way to mitigate risk effectively, grantees do not need to make reasonable accommodations under federal law.

OTIP grantees are encouraged to work closely with state and local public health authorities on issues related to addressing COVID-19 within their organizations and communities. If a grantee identifies a client with severe symptoms, they should notify their public health authority and arrange for the client to receive immediate medical care. OTIP grantees that provide housing are encouraged to review the Centers for Disease Control and Prevention's (CDC) [Interim Guidance for Homeless Service Providers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\)](#). HUD's [COVID-19 Prevention and Response for Homeless Providers](#) webpage includes additional information.

2. What can providers do to assess for the virus?

OTIP grantees are encouraged to work closely with their state and local public health authorities on issues related to addressing COVID-19 in their organizations and communities. [A list of state and local health departments and their websites](#) can be found on the Centers for Disease Control and Prevention's (CDC) Public Health Professionals Gateway.

3. Many of the community services that grantees traditionally rely upon for client referrals are not available due to closure or lack of capacity. What resources are available to assist with these resource shortfalls, particularly housing?

In the event that shelters or other service providers are not accepting referrals, organizations are encouraged to communicate with other organizations, local government officials, and public health agencies to identify additional sites that can be used as overflow shelters. In many locations across the U.S., local governments are using hotels and motels to house individuals and families.

Case managers can call on behalf of clients or visit the housing development or public housing authority for information on new affordable housing options, housing availability and eligibility, or how to apply. Public housing authorities own and operate public housing buildings and administer the Section 8 Housing Choice Voucher Program. Please visit [HUD's website](#) for more information and state resources. To find subsidized housing developments for clients, visit the [HUD Resource Locator](#).

4. To comply with social distancing requirements, our programs have transitioned to remote case management. Is there guidance available on best practices for remote case management?

The National Resource Center for Reaching Victims hosted the National Strategy Sessions on Sustaining Services during the COVID-19 Pandemic to bring the crime victims field together to develop strategies to address unprecedented challenges caused by the COVID-19 pandemic. Panelists discussed the effect of COVID-19 on crime survivors and their access to victim services, police, courts, hospitals, and other vital systems of support. Find transcripts of all sessions [here](#).

In addition, the Assistant Secretary for Planning and Evaluation (ASPE) has developed [guidance on virtual case management](#) that provides key consideration for programs considering this option. The Health Resources and Services Administration (HRSA) [Telehealth Compendium](#) is available on the [Telehealth Resource Centers website](#) along with [webinars](#) to support the effective delivery of telehealth services.

On March 28, 2020, the Department of Health and Human Services Office of Civil Rights issued guidance on [Civil Rights Laws and HIPPA Flexibilities](#) that apply during the COVID-19 emergency that grantees may wish to consider when developing program protocols for remote case management.

5. Our clients have limited or no access to cell phones, computers, the internet, or other resources required to access remote case management services. Are there any resources available to address these challenges?

In the event that your grant cannot cover costs of cell phones, computers, or connecting clients to the internet related to remote case management services, the following resources are available:

- [Lifeline Program for Low-Income Consumers](#)
- [EveryoneOn](#)
- [USDA Rural Broadband](#)
- [Free Comcast Xfinity hotspots](#)
- [Free Cox hotspots](#)
- [Free Spectrum hotspots](#)
- [Internet Essentials: Free internet through Comcast](#)
- [Free internet through Cox](#)
- [Spectrum internet resources](#)
- [Google Meet](#)

If your client resides in California, is enrolled in school (middle school, high school, or college), and is a current or former foster youth, iFoster may be able to help with a smartphone, hotspot, or computer to access classes. [Fill out this form to request help.](#)

6. Are there resources available to assist trafficking survivors with relocation and transportation safety and security needs?

The [National Human Trafficking Hotline](#) is fully operational and can assist with referrals.

For grantees who are assisting a survivor with a dire need for transportation, email transportationrequests@polarisproject.org to inquire about short-term emergency services. This is an internal email address; please do not share it outside of your grantee organization.

The National Runaway Safeline offers transportation services for individuals between the ages of 12 and 21 through the [Home Free program](#).

7. Grantee staffing resources are dwindling due to illness, lockdown requirements, and a lack of volunteers. What information regarding operational considerations during the pandemic are available?

Many grantees have asked for guidance regarding operational issues, such as how to comply with social distancing requirements, where to find personal protective equipment, protocols for disinfecting facilities and equipment, and how to handle administrative requirements like securing client signatures when operating remotely. While there is no centralized source that addresses the wide range of questions, the CDC has issued [guidance for businesses and employers](#) that address many of these types of questions.

Some organizations have reported success posting short-term job and volunteer opportunities on their normal communication platforms (email lists, social media, etc.). Grantees have created training and shadowing programs to onboard new individuals quickly in the midst of growing need.

In addition, the Coronavirus Aid, Relief, and Economic Security (CARES) Act authorized a program at the Small Business Administration (SBA) that may be helpful in supporting operational costs:

- The [Paycheck Protection Program](#) provides guaranteed loans to support 8 weeks of payroll and certain non-payroll costs (up to \$10 million) for small business and nonprofits experiencing economic hardship as a direct result of COVID-19. The loan is 100% forgivable when certain conditions are met (e.g., retaining employees, no large reduction in wages, etc.). The loans do not require collateral or a personal guarantee.

8. What resources and information are available to raise awareness of the increased risk and vulnerabilities of trafficking during the pandemic?

Please visit the following resources for more information:

- Department of State: [Know Your Rights](#)
- Department of Labor: [Coronavirus Resources](#)
- Legal Aid at Work: [Coronavirus Frequently Asked Questions](#)
- Safety Planning During COVID-19: [Tips from Survivors for Survivors](#)

9. What information is available to address reports of increased child abuse and trafficking?

April is [National Child Abuse Prevention Month](#). The U.S. Department of Health and Human Services (HHS) Office on Trafficking in Persons (OTIP) and the U.S. Department of Justice (DOJ) Office for Victims of Crime (OVC) hosted four listening sessions about child trafficking and exploitation during the COVID-19 pandemic. The discussions included how COVID-19 affects vulnerability to exploitation and access to supportive services for children and youth across the country. Additional information is available on the [OTIP's website](#).

Additional resources include:

- The National Child Traumatic Stress Network (NCTSN) [Online Safety Tips for Caregivers](#) and [Online Safety Tips for Teens](#)
- Love146 [Internet Safety Guide for Youth](#) and [Internet Safety Guide for Caregivers](#)

10. What resources are available to provide technical assistance support to clients on how to access services online?

To find resources on technology for survivors of domestic violence, sexual assault, and human trafficking, visit [TechnologySafety.org](#).

11. What guidance is available for obtaining assistance from the Social Security Office?

Social Security Offices are closed to the public for face-to-face service during the COVID-19 pandemic. You can still get SSA help by using their online services or calling SSA. You can do most of your business with SSA online. Before calling SSA, please visit the SSA website ([ssa.gov](#)) to see their list of convenient and secure self-service options. Save time and go

online. If you cannot use their online services, they can help with certain critical issues by phone and mail.

12. How can programs assist clients who need to provide verified signatures to access services and benefits?

Financial institutions have implemented e-signature capabilities. E-signature providers such as [DocuSign](#) and [Adobe Sign](#) provide an interface for sending and signing documents online that works with Certificate Authorities to provide trusted digital certificates.

13. Are there any resources to help staff address vicarious trauma resulting from COVID-19?

The CDC's [Stress and Coping webpage](#) includes resources about managing stress and coping with anxiety related to COVID-19.

14. Many grantees' clients are unemployed because of COVID-19, putting them at risk for recruitment into trafficking situations. What employment resources and information are available to assist clients?

The U.S. Department of Health and Human Services declared COVID-19 a nationwide public health emergency, which enables eligible applicants to request funding for [Disaster Recovery Dislocated Worker Grants \(DWGs\)](#) through the U.S. Department of Labor. The Recovery DWGs are also available to states and other eligible applicants affected by major economic dislocations, such as mass layoffs. There are many training and employment services supported under the DWG program. The Department of Labor also has a [webpage](#) that addresses unemployment insurance, employment and training, and other resources.

Grantees are also encouraged to assist clients in accessing [Economic Impact Payments](#), also referred to as stimulus payments, authorized by the CARES Act. There is also a [fact sheet](#) with information for youth about payments from the government.

The IRS has published additional information about the [economic impact payments](#), including information for [non-filers](#) on how to receive their payment.