

CHAPTER 3. U.S. GOVERNMENT RESPONSE TO HUMAN TRAFFICKING IN THE TWENTY-FIRST CENTURY

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Introduction

Slavery is rampant in the twenty-first century. The United Nation's International Labor Organization (ILO) estimates that 12.3 million people are in forced labor or sexual servitude at any given time.¹²⁸ Other figures range from 4 to 27 million.¹²⁹ Also according to the ILO, approximately 2.4 million of this number are forced into labor as a result of human trafficking. Sex trafficking, the largest subcategory of human trafficking, is a growing multibillion dollar industry with profits that reach the proportions of the illicit arms and narcotics trades.¹³⁰

Modern day slavery is not particular to any nation or region; it is a global epidemic from which virtually no state is immune, including the United States. The U.S. is both a source of and a destination for trafficked persons. Tens of thousands of people are believed to be trafficked into the United States every year.¹³¹ The fact that this gross human rights violation occurs within our borders raises significant moral, humanitarian, and legal concerns for the government and its citizens. Human trafficking is not only a disturbing violation of the 13th amendment and a basic devaluation of human life, the issue is increasingly recognized as a vital U.S. national security problem. Trafficking in persons has been linked to organized crime, drug

127 The author is Special Assistant to the Executive Director of PNSR. This paper is the authors' own work and does not represent the policy of the Department of Defense, the Institute of Defense Analyses, or any other government agency.

128 United Nations International Labor Organization, *A Global Alliance against Forced Labor*, (New York: United Nations, 2005) 10.

129 U.S. Department of State, *Trafficking in Persons Report*, (Washington, DC: Department of State, 2007) 8.

130 Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, D.C.: Congressional Research Service, 2007) 1.

131 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs, 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

trafficking, migrant smuggling, and terrorist financing. The practice has global, national, physical, and psychological health implications, and provides a clear illustration of the challenges posed by porous national borders.

The U.S. government response to human trafficking over the past decade serves as an interesting case study for the Project on National Security Reform for several reasons. Trafficking is a complex and multifaceted challenge that does not fall under the jurisdiction of any single executive branch organization. The anti-trafficking challenge unites nearly 30 offices in at least seven major U.S. government (USG) departments and agencies, several with traditionally limited national security responsibilities. It demands an integrated, cross-agency, whole-of-government¹³² approach. As a trans-border issue that is both global and local in nature, anti-trafficking initiatives require vertical¹³³ as well as horizontal¹³⁴ coordination in order to be successfully implemented in the United States and abroad.

Various interagency mechanisms, including task forces, policy groups, and fusion centers, have been formed since human trafficking came to U.S. and worldwide attention in the late 1990s. While these structures have facilitated interagency coordination to a degree, success remains severely inhibited by the lack of an established national or government-wide context to guide the implementation of an integrated anti-trafficking strategy; establish common goals; clarify executive branch roles, responsibilities, and authorities; and provide a context for funding, accountability, and nesting departmental processes. In the absence of a national framework, departmental goals, strategies, plans, and procedures are developed within each agency's broader mission, and not anchored in external or higher level anti-trafficking guidance beyond the Trafficking Victims Protection

132 "Whole-of-Government" refers to an approach that fosters government-wide collaboration on purpose, actions, and results in coherent combined application of available resources to achieve the desired objective or end state. (Stipulated definition, M. Lidy, et al., Institute of Defense Analyses).

133 "Vertical coordination" refers to coordination between federal, state, and local organizations on a domestic level, and national, regional, and host nation actors on an international level.

134 "Horizontal coordination" refers to coordination across U.S. government departments and agencies.

Act (TVPA) and National Security Presidential Directive 22 (NSPD-22). Successful instances of interagency coordination using both ad hoc and formal mechanisms are limited, and suffer from information-sharing challenges, interagency rivalries, and other obstacles resulting from disparate, departmental perspectives on anti-trafficking.

Following a short introduction to human trafficking, this paper will first discuss why the trafficking phenomenon deserves to be recognized as a U.S. national security concern. The text will then summarize the USG's counter-trafficking strategy of the past decade. The degree of strategic and practical integration will be considered subsequently. Finally, the case study will explore the obstacles to integration and the costs of Washington's inability to consistently apply a single coherent approach to the problem. Other valuable information can be found in the appendices to this study. Appendix C1 defines key human trafficking terminology; Appendix C2 summarizes relevant legislative and executive anti-trafficking authorities; and Appendix C3 reviews executive department and agency anti-trafficking roles and responsibilities.

Human Trafficking

Human trafficking thrives globally with little regard for religious, cultural, or national boundaries. Research cited in the State Department's 2007 Trafficking in Persons Report estimates that nearly 800,000 people are trafficked across national borders each year; a figure that does not account for the millions of persons trafficked within their native countries. Approximately 80 percent of those trafficked are women and girls—the majority of whom are subsequently forced into the sex slave trade—and up to 50 percent are minors.¹³⁵

The accuracy of trafficking statistics is uncertain due to a lack of reliable data.¹³⁶ The hidden nature of the crime creates a situation in which both traffickers and victims fear coming forward. Available

135 U.S. Department of State, *Trafficking in Persons Report*, (Washington, DC: Department of State, 2007) 8.

136 International figures are not generally considered more reliable; Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, D.C.: Congressional Research Service, 2007) 1.

statistical information is often developed and housed within individual departments and agencies. A July 2006 Government Accountability Office (GAO) report questioned the accuracy of USG statistics and concluded that “the U.S. government has not yet established an effective mechanism for estimating the number of victims or for conducting ongoing analysis of trafficking related data that resides within various government agencies.”¹³⁷ Additionally, the GAO cites “methodological weaknesses, gaps in data, and numerical discrepancies.”¹³⁸ The lack of an established set of USG-wide metrics, for example, contributes to an inability to measure the effectiveness of USG efforts and adjust assistance accordingly.¹³⁹

Transnational victims are usually trafficked from less-developed states to wealthier nations. The greatest numbers of victims are believed to be from South and Southeast Asia as well as the former Soviet Union. Other major originating points of trafficked women include Latin America, the Caribbean, and Africa.¹⁴⁰

Some trafficking victims willingly leave their home countries and initially are unaware of the conditions they will face, while others are forced or coerced. Many individuals are lured by promises of economic or educational prospects, only to find themselves tricked into a life of slavery. In other instances, families freely give children to friends or relatives who promise opportunity, but instead sell the child for profit.¹⁴¹ War, man-made catastrophes, and natural disasters resulting in refugees often increase conditions in which displaced populations are at risk.

137 Government Accountability Office, *Human Trafficking: Better data, strategy, and reporting needed to enhance U.S. anti-trafficking efforts abroad*, (Washington, DC: GAO, 2006) 3.

138 Ibid..

139 Ibid.

140 Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, D.C.: Congressional Research Service, 2007) 3.

141 U.S. Department of State. *Trafficking in Persons Report*, (Washington, DC: Department of State, 2007) 8.

Human Trafficking as a U.S. National Security Concern

Human trafficking might easily be viewed as far removed from U.S. national security. This is simply not the case. The 2000 TVPA identifies human trafficking as “a transnational crime with national implications.”¹⁴² The law continues by recalling the Declaration of Independence, which “recognizes the inherent dignity and worth of all people,” and states that “current practices of sexual slavery and trafficking of women and children are... abhorrent to the principles upon which the United States was founded.”¹⁴³

Tens of thousands of people are trafficked into the United States each year. Initial estimates cited in the TVPA suggest that approximately 50,000 people are trafficked into the U.S. annually, while the 2004 Trafficking in Persons Report approximates this number to be closer to 14,500–17,500 per year. Sources cited by the State Department’s Bureau of International Narcotics and Law Enforcement Affairs (INL) in 2007 provide estimates between 18,000 and 20,000.¹⁴⁴ Additionally, an unknown number of U.S. citizens and legal residents are trafficked within the country primarily for sexual servitude and, to a lesser extent, forced labor.¹⁴⁵ The sex industry, which is partially supported by trafficking, has expanded rapidly over the past several decades and today represents one of the fastest growing sources of profits for organized crime.¹⁴⁶ Although trafficking has become increasingly evident in smaller cities and suburbs, victims are typically

142 United States, *Trafficking Victims Protection Act*, (Washington, DC: United States, 2000)

143 Ibid. Section 102 quoting *Declaration of Independence*.

144 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs. 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

145 U.S. Department of Education, *Human Trafficking of Children in the United States: A Fact Sheet for Schools*, (Washington, DC: Department of Education, 2008); In the 2005 Trafficking Victims Reauthorization Act, Congress recognizes this lack of data and requires the Justice Department to issue two reports, currently underway, to provide more comprehensive and reliable data on domestic trafficking.

146 United States, *Trafficking Victims Protection Act*, (Washington, DC: United States, 2000).

trafficked to suburban areas, vacation destinations, or military bases where the demand is highest.¹⁴⁷

As if the mere existence of this humanitarian tragedy in the U.S. does not provide a sufficiently compelling case for action, human trafficking is increasingly recognized as a significant national security concern. The 2006 U.S. National Security Strategy calls for its “total abolition,” declaring that “future generations will not excuse those who turn a blind eye.”¹⁴⁸ The opening statement of the Charter for the Human Smuggling and Trafficking Center (HSTC), an interagency clearinghouse for trafficking in persons and other related crimes, clearly identifies the issue as a national security concern:

The related problems of migrant smuggling, trafficking in persons and clandestine terrorist travel are increasingly significant both in terms of the human tragedy they represent and their impact on national security, primarily with respect to terrorism, crime, health and welfare, and border control.¹⁴⁹

After acknowledging the U.S. government’s significant progress in combating human trafficking, the HSTC Charter asserts that “there remains additional work to be done before the U.S. Government response effort is fully commensurate with the seriousness of [this] national security threat....”¹⁵⁰

As the following section will illustrate, human trafficking is inseparable from organized crime, and is often linked to other illegal activities such as drug trafficking, migrant smuggling, and terrorist financing. In addition, trafficking weakens legitimate institutions by proliferating disease and fostering corruption. A transnational crime that exists with little regard for the nation state, trafficking serves as a harsh reminder of the inadequacies of border security.

147 Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress* (Washington, D.C.: Congressional Research Service, 2007) 3.

148 White House, *National Security Strategy*, (Washington, DC: United States, 2006) 7.

149 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs. 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

150 Ibid.

Trafficking and the Terrorism-Organized Crime Nexus

Human trafficking has been linked to organized crime, and to a lesser extent, terrorist activities. According to the State Department, profits from trafficking, which the Federal Bureau of Investigation (FBI) estimated at nearly 10 billion dollars, fuel other criminal enterprises.¹⁵¹ The preamble to the TVPA observes that “profits from the trafficking industry contribute to the expansion of organized crime in the United States and worldwide.”¹⁵² The legislation finds that trafficking in persons is increasingly “perpetrated by organized, sophisticated criminal enterprises” and that “such trafficking is the fastest growing source of profits for organized criminal enterprises worldwide.”¹⁵³ Human trafficking has also been connected to money laundering, drug trafficking, document forgery, piracy, and human smuggling (see Appendix C1 on terminology for distinction between human trafficking and smuggling).

In 2004, the Director of the United Nations Office on Drugs and Crime (UNODC) highlighted the de facto merger of criminal and terrorist organizations:

It has become more and more difficult to distinguish clearly between terrorist groups and organized crime units, since their tactics increasingly overlap. The world is seeing the birth of a new hybrid of “organized crime -- terrorist organizations”, and it is imperative to sever the connection between crime, drugs, and terrorism now.¹⁵⁴

Since 9/11, actual and potential ties between human trafficking and terrorism have become a growing area of concern. Trafficking, smuggling, and other transnational criminal networks provide funds and global criminal infrastructures, such as transportation networks, from which terrorist organizations can benefit.¹⁵⁵ In a 2004 hearing

151 U.S. Department of State. *Trafficking in Persons Report*, (Washington, DC: Department of State, 2006) 13; The FBI no longer stands by this estimate.

152 TVPA, 2000, section 102.

153 TVPA, 2000, section 102.

154 United Nations, *Press Release: UN Warns about Nexus between Drugs, Crime, and Terrorism*, 10 Jan. 2004, UN Office of Drugs and Crime, 28 Dec. 2008, available at www.un.org/News/Press/docs/2004/soccp311.doc.htm.

155 Louise Shelly, Human Trafficking: Transnational Crime and Links with

before the House Judiciary Subcommittee on Immigration, Border Security and Claims, the Deputy Assistant Director for Smuggling and Public Safety at the U.S. Bureau of Immigration and Customs Enforcement (ICE) testified that human smuggling and trafficking into the United States constitute a “significant threat to national security and public safety.” He further asserted that well-established smuggling and trafficking pipelines serve as a conduit for illegal aliens and criminals seeking entry into the U.S., many of whom easily could be “exploited by terrorist and extremist organizations” seeking to carry out violent acts.¹⁵⁶

The relationship between traffickers and terrorists is most prominent in regions of the world where trafficking is a significant part of the illicit economy. For example, in the Balkans, Southeast Asia, and parts of the former Soviet Union, these illicit trades can produce significant sources of revenue. In the Balkans, trafficking provides a major source of financing for criminal networks that have been linked to terrorist organizations. In Southeast Asia and the Philippines, trafficking networks afford opportunities for terrorists to move money through the illicit economy.¹⁵⁷ Trafficking also has been identified as a source of funding for Al Qaeda in Afghanistan. The Taliban has openly abducted women and girls. Many victims are sold as sex slaves through contacts arranged by the Al Qaeda network. Proceeds from the exchange allegedly help to sustain the Taliban.¹⁵⁸ According to a Department of Homeland Security (DHS) official, three factors have contributed to creating an environment in which terrorist networks are more likely to collaborate with human trafficking and smuggling networks: criminal organizations’ growth in numbers and sophistication, criminal networks’ increasing ability to exploit public corruption, and substandard immigration controls in source and transit countries.¹⁵⁹

Terrorism, Statement to the House Committee on International Relations, Subcommittee on International Terrorism, Nonproliferation and Human Rights (Washington DC: U.S. House of Representatives, June 25, 2003).

156 Jerry Seper, “Human Smuggling a Security Risk,” *Washington Times*, 19 May, 2004.

157 Ibid.

158 Kevin Sullivan, “Kabul’s Lost Women,” *Washington Post*, Wednesday, December 19, 2001.

159 Thomas Homan, *U.S. Officials Fears Terrorists, human smugglers may join forces*,

As global connectivity increases, the organized crime nexus continues to expand and become more intertwined. President Clinton's 1998 International Crime Control Strategy's (ICCS) chapter on "international criminal threats" describes the international criminal threat within the context of globalization:

[T]he more open our borders are, the more freely people can travel, the more freely money can move and information and technology can be transferred, the more vulnerable we are to people who would seek to undermine the very fabric of civilized life, whether through terrorism... weapons of mass destruction, organized crime, or drugs – and sometimes through all of the above.¹⁶⁰

The document goes on to assert that "international criminals ignore borders, except when seeking safe haven behind them."¹⁶¹ The sheer number of people brought into the United States illicitly via human trafficking (and also illegal immigration), indicates the dangers posed by porous national borders. The statistics for human trafficking alone beg the question: If criminal networks can traffic tens of thousands of people into the country each year, what else may slip through U.S. borders? Human trafficking in the U.S. raises significant concerns regarding the nation's ability to prevent biological or chemical weapons, for example, from being smuggled into the country. In fact, trafficking itself has been described as a gateway activity which can lead to trade in other commodities to include weapons, chemical, and toxic waste.¹⁶² Addressing human trafficking into the U.S. will better prepare the nation to deal with other border-related security challenges by causing Washington to more thoroughly examine its capacity to monitor and respond to the individuals or materials entering the country illegally.

Statement to the House Subcommittee on Immigration, Border Security, and Claims Committee on the Judiciary, (Washington DC: U.S. House of Representatives, 2003).

160 President William Clinton, April 29, 1996, cited in *International Criminal Control Strategy*, (Washington, D.C.: White House, 1998).

161 United States, *International Crime Control Strateg.*, (Washington, DC: White House, 1998).

162 Christine Dolan, panelist at a seminar on "Terrorism Mexus" hosted by the World Affairs Council, Washington, DC. In Initiative against Sexual Trafficking, "Terrorism and Trafficking: Finding the Nexus," *LAST Report*, Spring 2002, Vol 1, issue 1.

Erosion of Societal Fabric

Trafficking in persons has serious national (and global) health implications. Trafficking is a disease vector which endangers U.S. citizens. Frequently, victims are exposed to sexually transmitted diseases, including HIV/AIDS, to a much greater degree than the general population.¹⁶³ In addition, victims, who rarely have access to healthcare, are typically exposed to violence, confinement, and psychological abuse. A 2006 study of women trafficked into the European Union cited in the 2007 Trafficking in Persons Report found that “95 percent of victims had been violently assaulted or coerced into a sexual act” and that “60 percent of victims reported fatigue, neurological symptoms, gastrointestinal problems, back pain, and/or gynecological infections,” in addition to psychological traumas such as “dissociative and personality disorders, anxiety, and depression.”¹⁶⁴ Trafficking victims also exhibit a high rate of post-traumatic stress disorder (PTSD). The American Psychiatric Association defines PTSD as a condition which may result following “extreme traumatic stressors involving direct personal experience of an event that involves actual or threatened death or serious injury; or other threats to one’s personal integrity...”¹⁶⁵ A 1998 study found that of 130 interviewees involved in commercial sex, 68 percent had PTSD symptoms.¹⁶⁶ The prevalence of abused and otherwise embattered victims undermines the psychological and physical health of the population in the U.S. and around the globe.

Not dissimilar to the manner in which a disease can infiltrate a community, so too can corruption eat away at the pillars of society. Corruption is mentioned in five of the 10 “essential tasks” outlined

163 Fear of HIV/AIDS among clientele has led to an increased preference for younger girls, due to an assumed lack of infection; Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, DC: Congressional Research Service, 2007) 30.

164 U.S. Department of State. *Trafficking in Persons Report*, (Washington, DC: Department of State, 2007) 33.

165 American Psychiatric Association, 1994, Cited in Farley, Melissa, and Howard Barkan, “Prostitution, Violence, and Posttraumatic Stress Disorder,” *Women and Health*, Volume 27, Issue 3 (1998).

166 Farley, Melissa, and Howard Barkan, 1998 “Prostitution, Violence, and Posttraumatic Stress Disorder,” *Women and Health*, Volume 27, Issue 3 (1998).

as chapters in the 2006 National Security Strategy. In one chapter, the link between trafficking and corruption is cited as an example of the challenges associated with globalization. Illicit trade, whether in drugs, human beings, or sex, that exploits the modern era's greater ease of transport and exchange. Such traffic corrodes social order, bolsters crime and corruption, weakens effective governance, facilitates the illicit transfer of WMD and advanced conventional weapons technology, and compromises traditional security and law enforcement.¹⁶⁷

Human trafficking frequently relies on facilitation by corrupt officials in countries where governments struggle to uphold the rule of law. Reliance on corruption further undermines government authority and challenges the ability of legitimate institutions to protect vulnerable populations. Bribes can also prevent or delay freedom for the trafficked and prosecution of the traffickers. The 2006 Trafficking in Persons (TIP) report provides an illustration of how corruption feeds the vicious cycle of trafficking:

Maria, age 16, was tricked into traveling to Bucharest to find a job by a childhood friend. Unbeknownst to Maria, the friend had advertised in a Romanian port city that there was a "girl for sale." Maria was sold to a man with an 11-year-old girl. For four months, she was forced to work as a street prostitute under the threat of beatings. She was fined, arrested, and interrogated numerous times by the police; however, her "protector" bribed the police to release her, thus forcing her to prostitute again.¹⁶⁸

Fighting trafficking and fighting corruption go hand in hand. Both battles are necessary critical components in the promotion of democratic governance and stability around the world.

167 White House, *National Security Strategy*, (Washington, DC: United States, 2006) 47.

168 U.S. Department of State. *Trafficking in Persons Report*, (Washington, DC: Department of State, 2006) 14.

U.S. Response to Human Trafficking

Background

Human trafficking first attracted Washington's attention in the late 1990s during the Clinton administration.¹⁶⁹ A March 1998 Presidential Executive Memorandum outlined an anti-trafficking approach which targeted prevention, protection, and prosecution.¹⁷⁰ As part of this initiative, which focused more broadly on the subject of global crime networks, President Clinton authorized the creation of an interagency working group to address the international crime implications of human trafficking.¹⁷¹

Congress and the Bush administration have since expanded on these efforts to enhance Washington's ability to address trafficking in persons. The TVPA¹⁷² was enacted in January 2000 and serves as the statutory basis for the USG approach to anti-trafficking. The foundational legislation defined the trafficking challenge; re-emphasized the Clinton administration's focus on prevention, protection, and prosecution; and sought to provide the legal and institutional tools necessary to address human trafficking.¹⁷³ The TVPA directed the President to form an interagency Task Force to Monitor and Combat Trafficking in Persons and authorized the secretary of state to create the State Department's Office to Monitor and Combat Trafficking in Persons.

The Department of State issued its first congressionally mandated TIP Report in July 2001. Shortly after, in February 2002, NSPD-22 identified human trafficking as an important national security concern and directed federal agencies to strengthen their collective

169 Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, DC: Congressional Research Service, 2007) 11.

170 White House, *Presidential Executive Memorandum on Steps to Combat Violence Against Women and Trafficking in Women and Girls*, (Washington, DC: United States, 1998).

171 Clare M. Ribando, *Trafficking in Persons: U.S. Policy and Issues for Congress*, (Washington, DC: Congressional Research Service, 2007) 11.

172 United States, *Trafficking Victims Protection Act*, (Washington, DC: United States, 2000).

173 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007).

efforts, capabilities, and coordination to support the president's goal of abolishment.¹⁷⁴ Subsequently, and to the extent that they did not already exist, departments began to develop individual agency-level policies and procedures to address this emerging national security concern.

In addition to annual TVPA reauthorizations, key legislative authorities since the passage of the 2000 TVPA include the 2003 Foreign Relations Authorization Act which targets victim reintegration assistance, and the 2004 Intelligence Reform and Terrorism Protection Act which formally established the Human Smuggling and Trafficking Center. At least six U.S. Code Titles address different legal aspects of human trafficking. These titles deal with trafficking in the contexts of the international and domestic arenas, criminal procedures, labor, finance, and nationality. Key executive authorities since the 1998 Executive Memorandum include the 2002 National Security Presidential Directive on Combating Trafficking in Persons, which directs federal agencies to strengthen collective counter-trafficking efforts, the 2002 Executive Order 13257 which calls for the president's Interagency Task Force to Monitor and Combat Trafficking in Persons, and a 2004 amendment to Executive Order 13257 which tasks the Senior Operating Policy Group with establishing guidelines and policies to coordinate the activities of relevant executive departments and agencies. (See Appendix C2 for a detailed overview of U.S. legislative and executive anti-trafficking authorities.) The 2000 TVPA and NSPD-22 serve as the foundational USG authorities, legislative and executive respectively, for anti-trafficking efforts today.

Funding

Anti-trafficking cases can be resource intensive due to the lengthy investigation of incidents, involvement of multiple actors, and intensive rehabilitation of victims. Adding to the resource challenges, there is no parallel appropriations bill to fund mandates authorized in the TVPA. As a result, several departments and in some cases, subordinate offices, must look to existing budgets to fund anti-

174 White House, *National Security Presidential Directive 22 (NSPD-22): Memorandum Regarding Combating Trafficking in Persons*, (Washington, DC: United States, 2002).

trafficking activities. In the budget for the Department of Homeland Security, for example, there is no separate line item for combating human trafficking.

The Department of State estimates that the USG has spent over \$528 million to combat trafficking in persons internationally since (FY)2001. During (FY) 2007, the USG funded 180 international anti-trafficking programs in over 90 countries with approximately \$79 million. An additional \$23 million supported domestic projects that year.¹⁷⁵

Anti-trafficking programs received an additional infusion following President Bush's September 2003 announcement of a \$50 million initiative supporting organizations involved in anti-trafficking activities abroad.¹⁷⁶ This multi-agency funding pool sustained the international programs funded through the Department of State, Department of Justice, Department of Labor, Department of Health and Human Services, and the Agency for International Development, as well as national and international non-governmental organizations. Ultimately, the initiative intended to convict traffickers, assist victims, and combat trafficking around the world. It aimed to build capacity in eight "regional hubs" (Brazil, Cambodia, India, Indonesia, Mexico, Moldova, Sierra Leone, and Tanzania) to support the development of these nations as neighborhood leaders in the global fight against trafficking.¹⁷⁷

The State Department estimates that \$25 million of the initiative's funds were obligated in FY 2003, and approximately \$12.5 million in each of the following two years.¹⁷⁸ Departments and agencies

175 U.S. Department of State, *U.S. Government Funds Obligated for Anti-Trafficking in Persons Projects, Fiscal Year 2007*, February 2008, Office to Monitor and Combat Trafficking in Persons, 20 Apr. 2008, available at <http://www.state.gov/g/tip/rls/rpt/101295.htm>.

176 The president's initiative was focused internationally and was not paralleled by a funding pool to support domestic activities.

177 Department of State, *Fact Sheet: The President's \$50 Million Initiative to Combat Trafficking In Persons*, 12 Apr. 2006, Office to Monitor and Combat Trafficking in Persons, 20 Oct. 2007, available at <http://www.state.gov/g/tip/rls/fs/2006/69671.htm>.

178 Ibid.

responsible for anti-trafficking efforts obligated the remainder of the \$50 million in FY 2006. Funds were used to train and resource law enforcement to better identify and rescue victims; educate local non-governmental organizations; provide emergency, rehabilitation, and reintegration services to victims; instruct judges and prosecutors to prosecute and convict traffickers; and implement public awareness campaigns.¹⁷⁹ No such funding pool has been initiated for domestic programs.

Reporting and Assessment Requirements

Several departments are tasked with reporting on counter-trafficking progress. Two major assessments of U.S. national anti-trafficking activities are published annually, both by the Department of Justice with greater USG input.¹⁸⁰ The TVPA mandates an evaluation of the progress of the United States in the areas of trafficking prevention, prosecution, and assistance to victims. The 2003 Trafficking Victims Protection Reauthorization Act (TVPRA) requires an additional report from the Attorney General to be submitted to Congress every year beginning on May 1, 2004. Reflecting its core mission area, the State Department produces an annual report evaluating foreign nations' counter-trafficking performance. The document is intended to "raise global awareness, to highlight efforts of the international community, and to encourage foreign governments to take effective actions to all forms of trafficking in persons."¹⁸¹ Countries are rated using a tier system; "tier three" denotes those that are deemed not making significant efforts to meet minimum standards of the TVPA. The seventh annual report, issued in June 2007, identified 16 nations as tier three states including: Algeria, Bahrain, Burma, Cuba, Equatorial Guinea, Iran, Kuwait, Malaysia, North Korea, Oman, Qatar, Saudi Arabia, Sudan, Syria, Uzbekistan, and Venezuela.

179 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 38.

180 The TVPRA 2003 requires an annual report from the attorney general to Congress on U.S. government efforts to combat trafficking in persons.

181 U.S. Department of State, *Trafficking in Persons Report*, (Washington, DC: Department of State, 2007) 5.

Anti-trafficking Roles and Responsibilities

Appendix C3 summarizes the roles and responsibilities of seven major U.S. departments and agencies and 30 subordinate offices involved in anti-trafficking initiatives in the U.S. or abroad. Human trafficking assembles many disparate USG elements to address a single issue for which responsibilities may overlap. Table 1 amply illustrates this fact.

Table 1. Key Anti-Trafficking Functions

DEPARTMENTS AND AGENCIES	KEY FUNCTIONAL AREAS
DoJ Federal Bureau of Investigations	Investigates and/or prosecutes TIP cases domestically.
DoJ Civil Rights	
DoJ Criminal Division	
DoL Employment and Standards Administration	
DHS Immigration and Customs Enforcement	
DoJ U.S. Attorneys	
DoEd Office of Safe and Drug Free Schools	Funds programs/ initiatives or provides services or benefits to victims domestically
DHS Citizen and Immigration Services	
DHHS Administration for Children and Families	
DoJ Office of Justice Programs	
DoL Employment and Training Administration	
DoL Bureau of International and Labor Affairs	
DoS Diplomatic Security	Funds and/or implements international TIP programs, initiatives or agreements.
DoS Population, Refugees, and Migration	
DoS Office to Combat and Monitor TIP	
DoJ Criminal Division	
USAID Regional Bureaus	
DoL Bureau of International Labor Affairs	

The diffusion of roles and responsibilities made evident in Table 1 has led to the creation of several interagency mechanisms to coordinate efforts amongst U.S. government actors both vertically between federal state and local levels and horizontally across departments and agencies.

Interagency Mechanisms

Several interagency mechanisms have been formed over the past decade to address the complex issues posed by human trafficking. Two types of domestic task force were created to bring together federal, state, and local officials with non-governmental organizations in order to improve coordination of U.S. anti-trafficking efforts. In the first model, the Department of Justice's Bureau of Justice Assistance established 42 state and local human trafficking task forces by the end of FY 2006.¹⁸² The Human Trafficking Prosecution (HTP) Unit in the Justice Department's Civil Rights Division provides training, technical assistance, and coordination for the Task Forces, which are led by United States Attorneys and funded by the Bureau of Justice Assistance (BJA). In a second model, known as the Innocence Lost Initiative, FBI investigators and Criminal Division prosecutors have joined forces with state and local law enforcement to form 23 formal and ad-hoc task forces in various U.S. cities to prevent child exploitation in prostitution.¹⁸³

President's Interagency Task Force to Monitor and Combat Trafficking in Persons

In accordance with the TVPA, a cabinet-level interagency task force to monitor and combat trafficking in persons was established by Executive Order 13257 in February 2002.¹⁸⁴ The task force was created to coordinate the implementation of the TVPA; measure and evaluate U.S. and foreign progress in the areas of trafficking prevention, victim protection and assistance, as well as prosecution and enforcement; collect and organize anti-trafficking data; and facilitate cooperation among countries of origin, transit, and destination.¹⁸⁵

The TVPA directs the president to appoint members of the task force, which must include the secretary of state, the administrator of

182 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 3.

183 *Ibid.*, 21.

184 White House, *Executive Order 13257: President's Interagency Task Force to Monitor and Combat Trafficking in Person.*, (Washington DC: United States, 2002).

185 United States, *Trafficking Victims Protection Act*, (Washington, DC: United States, 2000).

the U.S. Agency for International Development, the attorney general, the secretary of labor, the secretary of health and human services, and the director of central intelligence. Agencies represented on the task force are not reimbursed for participating personnel.¹⁸⁶ To assist the task force, the TVPA authorized the secretary of state to create the Office to Monitor and Combat Trafficking in Persons.

According to the 2007 multi-agency assessment of U.S. government efforts to combat trafficking in persons, the task force met once in FY 2006. Six cabinet members were present and 12 agencies were represented. The group approved a unified policy document on HIV/AIDS and human trafficking, and focused on victim identification, research, and additional ways to improve assistance and outreach to trafficking victims in the U.S.¹⁸⁷ The task force oversees the activities of the Senior Policy Operating Group and is responsible for designating senior officials as its representatives.¹⁸⁸

Senior Policy Operating Group

The 2003 TVPA reauthorization authorized the creation of a Senior Policy Operating Group (SPOG) for trafficking in persons. The SPOG was established to address emerging interagency policy, program, and planning issues. Chaired by the director of the State Department's Office to Monitor and Combat Trafficking in Persons, the SPOG reports to the President's Interagency Task Force to Monitor and Combat Trafficking in Persons. Quarterly meetings include representatives from the Department of State, Department of Justice, Department of Homeland Security, Department of Health and Human Services, Department of Labor, Department of Defense, Agency for International Development, Office of the Director of National Intelligence, Department of Veterans Affairs, Department of Education, Office of the U.S. Global AIDS Coordinator, the

186 Ibid..

187 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 38.

188 United States. *Hearing before the Subcommittee on Human Rights and the Law of the Committee on the Judiciary United States Senate, One Hundred Tenth Congress, First Session, March 26, 2007: Legal Options to Stop Human Trafficking, Remarks for Deputy Assistant Attorney General for the Civil Rights Division, U.S. Department of Justice, Grace Chung Becker*, (Washington, DC: House of Representatives, 2007) 33–34.

National Security Council, the Domestic Policy Council, and the Office of Management and Budget.¹⁸⁹ SPOG activities have included coordinating agency strategic plans, policies, and programs to address human trafficking, developing grant policy and interagency guidelines, coordinating public outreach and research, and coordinating the president's anti-trafficking initiative.¹⁹⁰

SPOG's four FY 2006 meetings aimed to share information and coordinate policy implementation. Specifically, the SPOG approved funding guidelines and program review procedures, provided a forum for cross-agency feedback on grant and project proposals, and furnished recommendations to individual departments and agencies in an effort to enhance interagency coordination.¹⁹¹ Subcommittees have been established on Regulations and Statistics, chaired by the Department of Justice, and on Grant-Making, Research, and Public Affairs, chaired by the Department of State. These subcommittees work together on a more regular basis throughout the year.¹⁹²

Human Smuggling and Trafficking Center

The Human Smuggling and Trafficking Center (HSTC) was established by the 2004 Intelligence Reform and Terrorism Protection Act to serve as a clearinghouse for information related to terrorist travel, migrant smuggling, and human trafficking. It also prepares strategic assessments. The center is jointly operated by the Department of Homeland Security, the Department of State, and the Department of Justice, and is utilized by law enforcement, intelligence, and diplomatic communities. An interagency Steering Group, comprised of senior representatives from participating agencies "provides policy and administrative guidance and oversight for the HSTC and ensures that the HSTC operates in a manner that is consistent with constitutional liberties and national security

189 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 38.

190 Department of State, *Embassy of the United States Abidjan, Cote D'Ivoire: U.S. Policy and Issues*, 2007, U.S. Embassy in Cote D'Ivoire, 1 Apr. 2008, available at http://abidjan.usembassy.gov/us_efforts_against_trafficking.html.

191 Ibid.

192 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2006) 32.

requirements.”¹⁹³ The center is managed by a director and two deputy directors, held accountable through the Steering Group to the secretary of state, the secretary of homeland security, and the attorney general.¹⁹⁴ The State Department INL bureau provides administrative and funding support to the center.¹⁹⁵

Regarding all other personnel and support, the HSTC Charter describes the center as a primarily voluntary joint initiative, in which each agency “pay[s] the salaries, benefits, travel expenses, and allowances of the assigned personnel.” Participating departments are also responsible to “provide funding for the production of goods and services by the Center to support activities which fall within each respective agency’s authorities and responsibilities.” In this context, the charter states that “continued participation in the Center shall be subject to the availability of funds.”¹⁹⁶

HSTC’s charter notes that the center shall provide information in support of the U.S. anti-trafficking strategy, which is focused on three primary objectives, prevention and deterrence, investigation and prosecution, and protection and assistance. More specifically, the center is intended to “foster greater integration and overall effectiveness in U.S. government enforcement, diplomatic, and other response efforts; intensify efforts by foreign governments and international organizations; and to combat migrant smuggling, trafficking in persons, and clandestine terrorist travel.”¹⁹⁷ Integration is to be fostered by sharing information and intelligence, building collaborative relationships, coordinating initiatives upon request

193 Human Trafficking and Smuggling Center, *Establishment of a Human Smuggling and Trafficking Center: A Report to Congress*, (Washington, DC: HSTC, 2005) 4.

194 Ibid.

195 U.S. Department of State, *Human Smuggling and Trafficking Center*, Bureau of International Narcotics and Law Enforcement Affairs, 12 Jan. 2008, available at www.state.gov/p/inl/c14079.htm.

196 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs, 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

197 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs, 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

of departments and agencies, and identifying issues which warrant increased international attention or coordination.¹⁹⁸

The HSTC does not exercise authority over its contributing agencies. If, for example, intelligence identifies an area where further HSTC focus is needed, such action is dependent on the underlying authorities of the participating departments. When an issue is identified by the HSTC or intelligence community as requiring further attention, it is referred to the relevant departments and agencies for consideration.¹⁹⁹ Also, the HSTC is not a policy-making body. However, it is plugged in to the policy-making arena through participation in the NSC's Policy Coordination Committee on International Organized Crime and its subgroups. Additionally, the HSTC briefs the SPOG on its activities.²⁰⁰

Table 2 provides an overview of key interagency anti-trafficking mechanisms and their corresponding core function(s).

Table 2. Key Anti-Trafficking Functions

INTERAGENCY MECHANISM	KEY FUNCTIONS
President's Interagency Task Force	Measures and evaluates progress in the U.S. and other nations
	Expands interagency procedures to collect and organize anti-trafficking data
	Engages in efforts to facilitate cooperation among countries of origin, transit, and destination
Senior Policy Operating Group	Coordinates human trafficking policies, implementation, and programs
	Provides a forum for cross-agency feedback on grant and project proposals
	Provides recommendations to individual departments and agencies in an effort to increase agency involvement and levels of coordination

198 Ibid.

199 Ibid.

200 Human Trafficking and Smuggling Center, *Establishment of a Human Smuggling and Trafficking Center: A Report to Congress*. (Washington, DC: HSTC, 2005) 6.

Human Smuggling and Trafficking Center	Serves as an information clearinghouse
	Prepares strategic assessments
	Coordinates interagency issues upon request
Task Forces	Facilitate vertical coordination between federal, state, and local authorities.

Integration of National Power

The ability of the U.S. to address the challenge of human trafficking has improved significantly over the last decade. A 2006 Department of Justice Report indicates that nearly 1,000 human trafficking victims have been assisted by the department and other law enforcement personnel under the Trafficking Victims Protection Act of 2000.²⁰¹ The Department of Health and Human Services (DHHS) has certified an average of 200 victims per year for the receipt of federally funded or administered benefits and services.²⁰² Statistics from 2007 indicate that, since the enactment of the TVPA in 2000, federal investigative and prosecutorial agencies prosecuted 139 traffickers.²⁰³ Nevertheless, due to rising global demand, the trafficking problem only continues to grow.²⁰⁴ The tens of thousands of people trafficked into and within the U.S. annually demonstrate that the U.S. response to this national security challenge has been inadequate.

Success in combating trafficking is most often achieved on the level of individual departments and agencies. Only rarely does one see notable whole-of-government or national level achievements. Yet, interagency anti-trafficking activities need coordination for success.²⁰⁵

201 U.S. Department of Justice, *Report on Activities to Combat Human Trafficking*, (Washington, DC: Department of Justice, 2006) i.

202 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 5.

203 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 5.

204 Attorney General Alberto R. Gonzales, Assistant Attorney General Wan Kim, and Senior Department Officials, *Pen and Pad Roundtable on Human Trafficking*. Civil Rights Division, 4 Dec. 2007, available at http://www.usdoj.gov/crt/speeches/crt_speech_070131.html.

205 Coordination however, needs to be distinguished from integration. Webster's defines *integration* as "the act of combining into an integral whole." *Coordination*,

In fact, there is widespread agreement among those combating human trafficking that interagency coordination is essential for achieving a single integrated U.S. approach to anti-trafficking.²⁰⁶

Coordination is required due to the multi-jurisdictional nature of trafficking. In a single case there could be as many as seven investigating offices, not including the other departments and agencies providing services and assistance. A 2005 National Institute of Justice (NIJ) report states that trafficking in persons “never fits neatly under any single agency’s jurisdiction... [and that] interagency cooperation is vital to successful investigations and prosecutions as well as to identifying victims and assisting them.”²⁰⁷ A 2004 Report of the Washington State Trafficking Task Force characterizes the challenge of providing services to trafficking victims as “multi-disciplinary and multi-jurisdictional.”²⁰⁸

A 2007 GAO report cites several specific trafficking cases that illustrate the degree to which coordination is required. In one instance, the prosecution of a trafficking offender united Department of Justice FBI investigators, Department of Justice Civil Rights Division prosecutors, Department of Labor Wage and Hour Division investigators, Department of Labor Occupational Safety and Health Administration investigators, and various non-governmental organizations. The report asserts that anti-trafficking activities require “strategic collaboration among agencies since no one agency can carry out these efforts alone.”²⁰⁹ A 2007 multi-agency assessment

on the other hand, is defined as “the skillful and effective interaction of movements.” Integration emphasizes oneness, while coordination emphasizes the interaction of many; *Webster’s Dictionary*, 2007.

206 U.S. Department of State, *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs, 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

207 Kevin Bales and Steven Lize, *Trafficking in persons in the United States a report to the National Institute of Justice: final report*, (Jackson: Croft Institute for International Studies, 2005) 77.

208 State of Washington, Office of Crime Victims Advocacy, *Human Trafficking: Present Day Slavery: The Report of the Washington State Task Force Against Trafficking of Persons*, (Washington, DC: 2004) 61.

209 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 20.

of U.S. government efforts to combat trafficking in persons cites the example of the Department of Homeland Security's Citizenship and Immigration Services (USCIS) reliance on the DHHS. USCIS is responsible for providing trafficking victims approved to stay in the U.S. with a list of service providers, which is compiled and updated by the DHHS. USCIS depends on coordination with DHHS in order to keep this list current.²¹⁰

Many reports and assessments have recognized the importance of coordination when addressing an issue as complex as trafficking in persons and have called for increased levels to improve effectiveness of anti-trafficking activities. The case studies described in a 2005 report to the NIJ illustrate "that a multi-agency approach is most likely to lead to a successful prosecution."²¹¹ The first recommendation of the 2006 multi-agency Assessment of U.S. Government Efforts to Combat Trafficking in Persons is that "the U.S. Government, its state and local partners, and non-governmental organizations (NGOs) need to improve coordination of services to victims."²¹² This proposal was made in a domestic context in areas such as locating victims and tracking the support they receive. The report's final recommendations address the need for increased coordination across agencies both domestically and abroad:

The U.S. Government should increase cooperation among U.S. agencies to maximize efficiency in services provided, program development, and information dissemination. The U.S. Government should also cooperate with multilateral bodies to demonstrate U.S. Government commitment to leading the fight against trafficking in persons.²¹³

Government officials from departments and agencies with anti-trafficking responsibilities likewise have identified the importance of

210 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 2.

211 Kevin Bales and Steven Lize, *Trafficking in persons in the United States a report to the National Institute of Justice: final report*. (Jackson: Croft Institute for International Studies, 2005) 92.

212 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2006) 2.

213 *Ibid.*, 39.

coordination in effectively addressing human trafficking. The HSTC Charter states:

Federal government agencies involved [in anti-trafficking efforts] have all acknowledged that intensified efforts, together with enhanced interagency coordination, are urgently needed to support more effective law enforcement, diplomatic, and other actions to counter smugglers and traffickers.²¹⁴

Department of Justice and Department of Homeland Security representatives have acknowledged that prosecuting human trafficking crimes has necessitated cooperation among federal agencies and state and local law enforcement as well as non-governmental organizations.²¹⁵

Due to the widespread recognition that coordination is critical to achieving success in interagency anti-trafficking operations, it is useful to consider the degree to which such coordination occurs. The following analysis first considers how well the USG integrates its national anti-trafficking strategy. Subsequently, it explores the extent to which integration and coordination occur in strategy implementation. Next, key factors associated with the response and level of coordination are considered. Finally, the study reviews costs of trafficking and the consequences of the failure to devise and execute integrated anti-trafficking missions.

Did the U.S. Government generally act in an ad hoc manner or did it develop effective strategies to integrate its national security resources?

With core capabilities housed throughout the federal, state, and local government, an integrated strategy is imperative to successfully plan for and implement whole-of-government anti-trafficking initiatives. To the extent that a U.S. strategy to combat trafficking in persons exists,

214 U.S. Department of State. *Human Smuggling and Trafficking Center (HSTC) Charter and Amendments*, 2007, Bureau of International Narcotics and Law Enforcement Affairs, 2 Dec. 2008, available at <http://www.state.gov/p/inl/41444.htm>.

215 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 20.

it has its roots in the Clinton Administration's 1998 International Crime Control Strategy (ICCS). The ICCS identifies eight broad goals with thirty subordinate objectives as a "plan of action" to address international crime. One aim in particular responds to emerging international crime threats and recognizes the need to "take a multi-faceted approach to address new, complex crimes such as trafficking in human beings and the activities of crime group alliances." The third objective within this goal is to "reduce trafficking in human beings and crimes against children," which puts forth a "broad-based, interdisciplinary" approach centered on prevention, enforcement, and protection.

The expansive approach outlined in the ICCS is still commonly referenced today; however, a decade later, the document offers little actual guidance to the development and implementation of department-level anti-trafficking strategies and programs. The ICCS asserts that all international criminal organizations share common characteristics and vulnerabilities and therefore a single strategy to address the range of international criminal threats is sufficient. While the document has helped to better understand the linkages across broad approaches to addressing international crime, the ICCS has not been a substitute to a single comprehensive and granular U.S. government strategy to address human trafficking.

The 2000 TVPA does not demand a holistic strategy to address the issue of human trafficking and provide action-oriented guidance to relevant departments and agencies. Strategy as a requirement is mentioned once in the legislation, wherein the Domestic Violence Task Force is directed to develop a "coordinated strategy to strengthen research focused on domestic violence education, prevention, and intervention strategies."²¹⁶ The 2006 National Security Strategy (NSS) refers to human trafficking in only two instances, both highlighting the importance of the issue, but neither providing "strategy" in any level of detail. The NSS identifies human trafficking as a "form of modern-day slavery" and calls for its "total abolition," but offers no substantive strategy to help guide the achievement of

216 United States, *Trafficking Victims Protection Act*, (Washington, DC: United States, 2000) Sec. 40901.

this goal.²¹⁷ U.S. embassies abroad often incorporate anti-trafficking into Mission Performance Plans (MPPs) as a component of the overall U.S. strategy for a particular country.²¹⁸ These plans are country-specific and linked only to individual agencies, not to any higher level U.S. anti-trafficking strategy.

National Security Presidential Directive 22 requires all departments and agencies with anti-trafficking responsibilities to “strengthen their collective efforts, capabilities, and coordination to achieve the president’s goal of abolishing human trafficking.”²¹⁹ The directive also identifies the need to use “all appropriate tools” and directs relevant departments and agencies to work together.²²⁰ However, departments are left alone to develop anti-trafficking strategies, plans, and procedures, which consequently nest within a broader individual agency mission, but not within any context external to the organization. A 2007 GAO report called for establishing this higher context, recommending a “strategic framework” be developed to “help enhance and sustain collaboration among federal agencies dealing with issues that are national in scope and cross agency jurisdictions.” The framework would include at least “a common outcome, mutually reinforcing strategies, and compatible policies and procedures to operate across agency boundaries.”²²¹

In the absence of more established interagency arrangements, the interagency community relies on ad-hoc executive direction and agreements such as Memorandums of Understanding (MOUs) to coordinate between and within anti-trafficking organizations. Agreements of this kind represent a positive step toward increased

217 White House, *National Security Strategy*, (Washington, DC: United States, 2006) 7.

218 U.S. Government Accountability Office, *Monitoring and Evaluation of International Projects are limited, but experts suggest improvement*, (Washington, DC: GAO, 2007) 17.

219 White House, *National Security Presidential Directive 22 (NSPD-22): Memorandum Regarding Combating Trafficking in Persons*, (Washington, DC: United States, 2002).

220 U.S. Department of Defense, *Assessment of DoD Efforts to Combat Trafficking in Persons: Phase II: Bosnia-Herzegovina and Kosovo*, (Arlington, VA: Department of Defense, 2003) 13.

221 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) summary page.

coordination and will always be necessary as coordination is often required in unforeseen ways; however, in the absence of an overarching strategy that links resources to authorities and clearly establishes the roles and responsibilities of each federal agency, the significance of such arrangements is increased. For instance, the Department of Justice provides guidance on handling human trafficking cases through memorandums between offices such as the Civil Rights Division and the Federal Bureau of Investigations, as well as between the Department of Justice and other federal agencies. The Department of Homeland Security, Department of Justice, and the Department of Health and Human Services have all signed a MOU in an attempt to outline each department's roles and responsibilities in the area of victim certification.²²²

Common strategies, plans, and procedures exist at the departmental, and sometimes the subordinate office level. Within an agency such as the Department of Justice, in which anti-trafficking capabilities are not localized, both ICE and the FBI for example, disseminate separate anti-trafficking guidance to their field agents. ICE has developed its own Trafficking in Persons Strategy, which provides direction on outreach, training, and coordination.²²³ The Justice Department has recognized the need for "effective intra-departmental collaboration to bring the specialties of each component to bear on these multi-faceted, complex, and labor-intensive criminal cases."²²⁴

In sum, integrated strategies are not currently developed across the U.S. national security system. Coordinated, or at the minimum, compatible strategies exist on an ad-hoc, individual basis.

PITF and the SPOG

The 2006 Department of Justice Assessment on U.S. Efforts to Combat Trafficking in Persons found that in Fiscal Year 2005, the SPOG successfully helped to identify and address weaknesses in interagency coordination. In one such instance, the SPOG recognized

222 Ibid.

223 Ibid.

224 U.S. Department of Justice, Civil Rights Division, *Report on Activities to Combat Human Trafficking: Fiscal Years 2001-2005*, (Washington, DC: Department of Justice, 2006) 32.

the need to include the Office of the U.S. Global AIDS Coordinator in the group.²²⁵ The SPOG Subcommittee on Public Affairs improved coordination efforts among domestic media through identifying common media strategies. The Subcommittee on Research assisted in mapping all USG anti-trafficking programs in an effort to increase transparency and identify gaps.²²⁶

In a March 2007 hearing before the U.S. Senate Subcommittee on Human Rights and the Law, the deputy assistant attorney general for the civil rights division testified to the coordinating role of the SPOG and the President's Interagency Task Force (PITF), stating that "these interagency task forces increase coordination between relevant federal agencies on TIP-related issues." The deputy assistant attorney general went on to address the role of the SPOG in coordinating strategy:

The overall coordination of trafficking strategy between U.S. Agencies is done through the Senior Policy Operating Group (SPOG) meetings, a policy coordination working group, which is chaired by the Ambassador-at-Large in the State Department Office to Monitor and Combat Trafficking in Person.²²⁷

In addition to its coordinating role, it is important to recognize the limits in authority and scope of the SPOG. As an example of the latter, while the body provides a forum for policy coordination, it does not serve as a platform for integrated strategy development. Funding streams, authorities, and overall context of SPOG representatives ultimately reside within home agencies. Despite the lack of authority over participating agencies, the ambassador-at-large in the State Department Office to Monitor and Combat Trafficking in Persons can be influential in coordinating interagency policy. In instances where differing agency perspectives can not be overcome through this

225 U.S. Department of Justice, *Report on Activities to Combat Human Trafficking*, (Washington, DC: Department of Justice, 2006) 12.

226 Ibid.

227 United States, *Hearing before the Subcommittee on Human Rights and the Law of the Committee on the Judiciary United States Senate, One Hundred Tenth Congress, First Session, March 26, 2007: Legal Options to Stop Human Trafficking, Remarks for Deputy Assistant Attorney General for the Civil Rights Division, U.S. Department of Justice, Grace Chung Becker*, (Washington, DC: House of Representatives, 2007) 33–34.

mechanism, the Domestic Policy Council, which has a mandate to “ensure that domestic policy initiatives are coordinated and consistent throughout federal agencies,” has intervened in order to resolve interagency disputes.²²⁸

In the absence of an integrated national approach to the problem, strategic coordination is dependent upon mechanisms such as the President’s Interagency Task Force and the Senior Policy Operating Group. These policy-level bodies have facilitated coordination to a degree by providing a forum for federal agencies to come together, but they lack authority in areas such as funding, strategy development, personnel recruitment, and assignment of department and agency roles and responsibilities. When it comes to the successful implementation of anti-trafficking missions, the GAO asserts that “operational coordination on investigations and prosecutions of trafficking in persons rests with criminal justice personnel and currently occurs on a case-by-case basis.”²²⁹

How well did the agencies/ departments work together to implement these ad hoc or integrated strategies?

Operational anti-trafficking achievements are achieved primarily at the departmental level. A 2007 GAO report found that success at an interagency level is reactive, dependent upon personalities, and achieved on a case-by-case basis.²³⁰ Indeed, officials from the Departments of Justice and Homeland Security have recognized that the degree to which coordination occurs during trafficking investigations and prosecutions is determined by the circumstances of each particular case and the personal existing relationships between agencies involved.²³¹

A lack of coordination between federal agencies involved with the provision of services to trafficking victims has also been identified

228 The White House, *Domestic Policy Council*, 20 Apr. 2008, available at <http://www.whitehouse.gov/dpc/>.

229 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 27.

230 *Ibid.*, 6.

231 *Ibid.*, 20.

by the recipients of these services. A 2007 Report to the NIJ evaluating a Department of Justice comprehensive service program provides one such perspective. Clients did not think agencies were working together to assist them. A few clients felt their providers did not work together and did not seem to know what other partners were doing with their case.²³²

Similarly to the policy-level coordinating mechanisms, the Human Smuggling and Trafficking Center provides a forum for operational coordination between federal agencies, but lacks authority and is dependent upon the initiative of individual agencies for success. In the field, coordination remains largely ad-hoc and is achieved on a case-by-case basis.

Human Smuggling and Trafficking Center

The fledgling HSTC has increased operational coordination to a degree and has made limited progress in fulfilling its charter. The 2007 multi-agency Assessment of U.S. Government Efforts to Combat Trafficking in Persons cites several examples of HSTC accomplishments:

The HSTC... plays a crucial de-confliction role for the various agencies who share jurisdiction over trafficking in person investigations. For example, in 2006, the HSTC identified an international sex-trafficking organization on the East Coast that was being investigated independently by both ICE and the FBI. The HSTC identified this conflict and notified each agency, enabling a coordinated investigation.²³³

HSTC facilitates awareness by providing a conduit for communication and fosters collaboration through the detailing of full-time staff from key agencies.²³⁴

232 Caliber, *Evaluation of Comprehensive Services for Victims of Human Trafficking: Key Findings and Lessons Learned*, (Fairfax, VA: Caliber, an ICF International Company, 2007) x.

233 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons*, (Washington, DC: United States, 2007) 18.

234 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework*

The 2006 Department of Justice Assessment on U.S. Government Efforts to Combat Trafficking in Persons²³⁵ acknowledges the progress made by the HSTC, but suggests that the center has often fallen short of fulfilling its interagency charter. The report states that the HSTC has achieved its mandate by disseminating intelligence, developing strategic assessments, and assisting in dismantling significant crime organizations, all “on a limited basis.” The assessment identifies problem areas such as staffing, data connectivity, administrative infrastructure, and limited delegation of certain authorities to the HSTC’s director and staff. The Justice Department report concluded that “until these issues are resolved its functionality is limited.”²³⁶ Regarding the HSTC’s key function of information sharing, a Justice Department assessment acknowledged the significant progress made with the HSTC, but also identified problems in accessibility to key databases. Anti-trafficking case information is housed throughout several department’s databases, making it difficult to track victims from identification to reintegration. According to the 2006 Report, the HSTC has “developed a detailed plan to establish administrative and information-sharing support structures and procedures,” to address this concern.²³⁷

The HSTC exercises no authority over the participating agencies to shape programs or ensure coordination. Thus, coordination is facilitated by the center, but relies on individual agency initiative and is ultimately determined by individual agency policies and missions. Also, HSTC desk officers and analysts are currently detailed from participating organizations without established staffing requirements or long-term funding mechanisms.²³⁸ These limitations in authority and funding hinder the impact of the HSTC.

could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters, (Washington, DC: GAO, 2007) 21.

235 U.S. Department of Justice, *Report on Activities to Combat Human Trafficking*, (Washington, DC: Department of Justice, 2006) 12.

236 U.S. Department of Justice, *Report on Activities to Combat Human Trafficking*, (Washington, DC: Department of Justice, 2006).

237 U.S. Government, *Assessment of U.S. Government Efforts to Combat Trafficking in Persons in Fiscal Year 2005.*, (Washington, DC: U.S. Government, 2006) 13

238 Human Trafficking and Smuggling Center, *Establishment of a Human Smuggling and Trafficking Center: A Report to Congress*, (Washington, DC: HSTC, 2005).

Overall, the HSTC has increased coordination among stakeholders to a degree, but is limited by authorities and resources. In the end, processes, funding streams, and overall perspectives of representatives are most closely linked to home agencies.

Vertical Coordination

Coordination is necessary not only horizontally across departments and agencies, but also vertically, between federal, state, and local levels domestically. On a domestic level, a 2007 GAO report has recommended that the attorney general and the secretary of homeland security develop and implement a strategic framework to enhance collaboration between agencies participating in domestic task forces. Justice and Homeland Security officials have generally agreed with the need for enhanced collaboration.²³⁹

Domestic task forces do not share common standards, processes, or one lexicon. Nor is there a common body that coordinates activities across these entities. Each task force is connected to SPOG solely through the Justice Department. The 3rd Annual National Conference on Human Trafficking in September 2007 brought together hundreds of task force members from the BJA-funded teams and the Innocence Lost Initiative. The conference represented a positive step in bringing together representatives from these two interagency entities.

Vertical coordination is also a requirement when implementing successful anti-trafficking initiatives abroad. U.S. officials have identified the issue of program awareness as one area that suffers from a lack of communication between U.S. embassies and Washington-based federal agencies. In one instance, a U.S. official abroad was unaware that a particular anti-trafficking program existed until that program requested funds from the embassy. A list of anti-trafficking projects is provided to the embassies by the Department of State's Trafficking in Persons office in Washington.²⁴⁰

239 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 8.

240 U.S. Government Accountability Office, *Monitoring and Evaluation of International Projects are limited, but experts suggest improvement*, (Washington, DC: GAO, 2007) 17.

In sum, a coordinated approach to implementation of anti-trafficking strategies is limited and occurs on a case-by-case basis at both the horizontal and vertical echelons of U.S. government operations. There are several key factors that contribute to the lack of coordination in the execution of department-level anti-trafficking programs and policies.

What variables explain the strengths and weaknesses of the response?

Existing interagency mechanisms are effective to varying degrees in facilitating federal cooperation in countering human trafficking. The GAO describes the current coordinating mechanisms as inadequately providing for the “greater collaboration needed...”²⁴¹ Successful integration of anti-trafficking efforts across departments and agencies on a case-by-case basis is not sufficient to comprehensively address this vital national security challenge.

Strategic Context

Currently, there is no overarching U.S. anti-trafficking strategy that identifies clear government-wide goals and clarifies roles and responsibilities. Without such a framework, there is no context for the departmental-level development of mutually reinforcing strategies to help align department and agency goals, activities, processes, and resources towards a common outcome and to decrease reliance on more ad hoc inter-departmental coordination mechanisms.

The GAO cites past research that demonstrates the benefits of an overarching “strategic framework” to help to improve and sustain interagency coordination on issues such as human trafficking that are “national in scope and cross agency jurisdictions.” Identifying common outcomes is described as an essential step in developing a national strategy. The report continues to suggest that such an outcome “could hinge on an ideal ‘end state’ followed by a logical hierarchy of major goals [and] subordinate objectives...” Identifying common outcomes can be useful at a national level, in addition to a governmental level, by helping to more closely align the goals of

241 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 22.

law enforcement agencies with relevant NGOs for example.²⁴² In the absence of such outcomes, coordination between anti-trafficking organizations is less likely to occur, while differences in agency missions, cultures, and processes have proven more difficult to overcome.

In one interpretation, “a strategic framework provides a commonly understood intellectual and policy construct by which different departments and agencies can exercise their responsibilities to implement a strategy.”²⁴³ Research presented in a 2005 Report to the National Institute of Justice provides several cases that illustrate a lack of clarity among departments and agencies regarding anti-trafficking responsibilities. In one instance, federal investigators required information from the Department of Labor; however, both agencies differed on the level of assistance that was required.²⁴⁴

In another instance, lack of clarity on roles and responsibilities was identified between immigration authorities and the FBI:

There’s only been two joint cases with the FBI and they didn’t turn out so well. The lead came to me (INS). I started to research it, but the FBI felt it should be their case. I disagreed because they’re not the experts on smuggling – that’s the INS’ job. It was sad to lose the case. In the end the victims didn’t get help. They could’ve been assisted if we got the case. But, for some reason agencies believe we’ll deport. I’m sure we [law enforcement] could have done better if the case had been handled through a joint approach.²⁴⁵

GAO also asserts that a strategic framework could help to “foster efforts to devise compatible standards, policies, procedures, and

242 Ibid., 22–23.

243 U.S. Department of Defense, *Unclassified Briefing: Improving Planning for Stability Operations*, (Arlington, VA: Department of Defense, January 16, 2008).

244 Kevin Bales and Steven Lize, *Trafficking in Persons in the United States a Report to the National Institute of Justice: Final Report*, (Jackson: Croft Institute for International Studies, 2005) 132.

245 Ibid., 131.

information systems that will be used in collaborative efforts for a range of topics across federal agencies.”²⁴⁶

Similar to roles and responsibilities, perceptions on authority can differ across the interagency community. For example, several members of the Department of Justice Civil Rights Division asserted that the Human Trafficking and Prosecution Unit was positioned to take a leadership role in coordinating anti-trafficking efforts. However, the Department of Homeland Security’s ICE officials did not recognize a need for leadership beyond that of the SPOG. Department of Justice officials on the other hand, asserted that the SPOG and its working groups were not sufficient interagency leadership mechanisms because investigative and prosecutorial agencies were constrained by operational-level rules and limitations, while the SPOG operated at a policy level.²⁴⁷ The FBI also recognized that true interagency authority and leadership needs to cut across federal agencies since no one department can address trafficking on its own.²⁴⁸ Currently, there is no entity in the interagency space above the departments and below the president with the authority to fulfill this leadership role.

In a 2007 survey of organizations involved in the provision of services to trafficking victims through a comprehensive service program, nearly all of the elements of a strategic framework were singled out as problem areas. Partner agency representatives reflecting on past experiences identified that “collaboration and coordination among service providers working with victims of human trafficking had not been common practices.” Approximately half of those surveyed indicated that key partners did not engage in joint planning and activities for victims, did not work together towards common goals that were complementary, and lacked a shared vision among service-providing agencies.²⁴⁹

246 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 28.

247 *Ibid.*, 27.

248 *Ibid.*, 27.

249 Caliber, *Evaluation of Comprehensive Services for Victims of Human Trafficking: Key Findings and Lessons Learned*, (Fairfax, VA: Caliber, an ICF International Company,

Information Sharing

Challenges in sharing information can also inhibit interagency coordination. In the absence of an integrated approach, it is common for departments and agencies to view human trafficking challenges from the perspective of individual agency interests, which can result in a reluctance to share information externally.²⁵⁰ In a 2007 survey of organizations involved in the provision of services to trafficking victims, 48 percent of individuals surveyed recognized that partners historically did not “interact for the purposes of sharing information and communicating about human trafficking.”²⁵¹

Even within a single agency like the Department of Justice, where anti-trafficking capabilities exist throughout the organization, information is not always shared. Justice Department officials have identified the need to establish more formal mechanisms for communication and information sharing, noting that case-by-case information sharing was good overall, but that there was a lack of consistency in information sharing among field offices. The need for a central repository of trafficking information has also been recognized.²⁵² A 2007 GAO report on the monitoring and evaluation of international anti-trafficking projects found that officials in countries where research was performed often relied on ad hoc meetings to share information amongst themselves and with implementing partners.²⁵³

2007) 21.

- 250 Amy O'Neill Richard, *International trafficking in women to the United States a contemporary manifestation of slavery and organized crime*, (Washington, DC: Center for the Study of Intelligence, DCI Exceptional Intelligence Analyst Program, 2000) 31.
- 251 Caliber, *Evaluation of Comprehensive Services for Victims of Human Trafficking: Key Findings and Lessons Learned*, (Fairfax, VA: Caliber, an ICF International Company, 2007) 21.
- 252 U.S. Government Accountability Office, *Human Trafficking a Strategic Framework could Help Enhance the Interagency Collaboration needed to Effectively Combat Trafficking Crimes: Report to Congressional Requesters*, (Washington, DC: GAO, 2007) 24.
- 253 U.S. Government Accountability Office, *Monitoring and Evaluation of International Projects are limited, but experts suggest improvement*, (Washington, DC: GAO, 2007) 17.

Interagency Rivalries

A 2005 Case Study on Trafficking in Persons in the U.S. points to patterns of conflict between federal law enforcement agencies. Research identified that rivalries between the FBI and other federal law enforcement agencies were particularly salient. Areas of divergence were also noted between the FBI and attorney general's office, and between the FBI and immigration authorities. For example, a Department of Justice official indicates:

I brought in the case early on and after that I sense some micro-managing going on. I first approached the U.S. Attorney's office to request subpoenas... First of all, let me mention that there was some tension between the U.S. Attorney's office and the FBI. The U.S. Attorney's office does things differently than the FBI... I would say that we had our professional agreements on certain issues – that's all.²⁵⁴

One aspect of interagency criticism focused on a perceived lack of commitment to tackle anti-trafficking cases. The following is an excerpt from an interview with a Department of Justice Prosecutor regarding an investigation of a Florida agricultural trafficking case:

It was incredibly frustrating – we needed certain things to prosecute the case, but had trouble getting it with the agents we had. We spent two years working with the federal agents in Florida, going back and forth, and I don't know if they were as committed to the case as we were.²⁵⁵

The problem of interagency rivalries and conflicts extends to the U.S. government's interaction with Non-governmental Organizations (NGOs) as well. The above-cited 2005 study states that “federal investigators and prosecutors repeatedly cited the conflict between federal agencies and NGOs as a stumbling block.”²⁵⁶ NGO workers

254 Kevin Bales and Steven Lize, *Trafficking in Persons in the United States a Report to the National Institute of Justice: Final Report*, (Jackson: Croft Institute for International Studies, 2005) 131.

255 Ibid.

256 Ibid., 130.

voiced similar concerns regarding the FBI's capacity to effectively address human trafficking cases.²⁵⁷ The study concluded that "such inter-agency rivalries and conflicts, whether based on fact or personal viewpoints, inhibit the multi-agency collaboration required to increase prosecutions of human traffickers."²⁵⁸

Personnel and Funding Challenges

A shortage of personnel to address human trafficking poses a significant challenge. Coordination mechanisms such as the HSTC require full-time staff devoted to anti-trafficking. Yet, GAO finds that U.S. officials involved in anti-trafficking initiatives overseas are often responsible for other issues as well. At the U.S. Embassy in Indonesia for example, the official charged with anti-trafficking duties was also assigned as the deputy chief of mission in East Timor. In Mexico, a failure to replace the sole official with anti-trafficking responsibilities caused confusion for Mexican authorities who were uncertain as to who was responsible for issues related to human trafficking within the U.S. government.²⁵⁹

U.S. officials overseas identified a lack of awareness regarding other departments' plans to allocate funding for anti-trafficking activities as a challenge. The alignment of foreign assistance funding under the director of foreign assistance is intended to coordinate such information, however, some officials have expressed uncertainty regarding which part of the U.S. government would be responsible for developing the U.S. anti-trafficking budget.²⁶⁰ Trafficking cases are among the most expensive to investigate and prosecute. In the absence of appropriations to parallel the congressional authorization, agencies must take existing programs to pay for anti-trafficking efforts. The president's \$50 million initiative assisted in providing limited support to international programs, but provided no corresponding funds for domestic anti-trafficking initiatives.

257 Ibid., 131.

258 Ibid.

259 U.S. Government Accountability Office, *Monitoring and Evaluation of International Projects are limited, but experts suggest improvement*, (Washington, DC: GAO, 2007) 17.

260 Ibid., 18.

What diplomatic, financial, and other achievements and costs resulted from these successes and failures?

This case has explored various costs broadly associated with the existence of trafficking including expanded criminal networks, terrorist financing, infiltration of disease, and corruption contributing to the erosion of legitimate institutions worldwide. The paper has also exposed several more specific costs that derive from a failure to devise and implement an integrated approach to this complex national security challenge. Overall, the discussion shows that the U.S. response to trafficking has been reactive and dependent on individual cases and personal relationships for success. The lack of a federal anti-trafficking strategy increases reliance on coordination between individual organizations with diverse perspectives on the problem. These disparate strategies and visions of success inhibit evaluation and improvement on U.S. anti-trafficking initiatives. Without common goals, there are no apparent metrics that can be applied to anti-trafficking programs across the whole-of-government. Insufficient clarity regarding USG roles and responsibilities for anti-trafficking efforts has resulted in instances of confusion among U.S. officials, host nation counterparts, and trafficking victims alike. U.S. authorities have expressed uncertainty regarding existing and appropriate roles of federal agencies with anti-trafficking responsibilities. Ambiguity concerning a lead U.S. agency for anti-trafficking efforts in a particular country can also confuse host nation officials seeking to work with the U.S. on the issue. Finally, from the perspective of trafficking victims, care providers do not always seem to coordinate with one another and can appear unaware of how their partner organizations are handling a common case.

Conclusion

The moral and humanitarian implications of human trafficking are readily apparent. Moreover, trafficking is a vital U.S. national security concern that has been linked to organized crime, terrorism, global health, and government corruption. Consensus largely exists that the lack of an integrated approach has inhibited the ability of the USG to successfully counter the complex human trafficking threat. An analysis of the USG response to this national security challenge over the past decade has revealed a lack of an integrated strategy to guide the

implementation of a government-wide approach to anti-trafficking. As a result, cross-agency coordination in executing department-level strategies and plans is often unstructured and sporadic. Several interagency mechanisms have been created to facilitate coordination, and they are successful to a degree, but they are constrained by a lack of authorities in key areas such as personnel recruitment, funding streams, and assignment of roles and responsibilities. The result has been a primarily reactive response, confusion over anti-trafficking roles and responsibilities, and an inability to effectively evaluate and improve existing anti-trafficking programs.