



Sylvia M. Burwell
Secretary
United States Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

October 30, 2014

Dear Secretary Burwell,

HEAL (Health, Education, Advocacy, Linkage) Trafficking, a national and international network of interdisciplinary health professionals, would like to state our support of the Administration for Children and Families' (ACF) "Stop, Observe, Ask and Respond" (SOAR) human trafficking training initiative. We also offer suggestions for future Health and Human Services (HHS) developments in the context of the Federal Strategic Action Plan on Service to Victims of Human Trafficking in the United States.

HEAL Trafficking has been at the forefront of informing the national response to trafficking from a health perspective. In particular, HEAL Trafficking's members have been present both on the HHS/ACF SOAR National Technical Working Group and the Institute of Medicine's Committee on Commercial Sexual Exploitation of Children in the United States. Furthermore, one of HEAL Trafficking's co-founders was an expert witness for the September 11, 2014 Congressional Subcommittee on Health panel, "Examining H.R. 5411, Trafficking Awareness Training for Health Care Act of 2014."

HEAL Trafficking's mission is to unite health professionals to advance their critical role in the national and global fight against human trafficking. HEAL Trafficking serves as a centralized resource on health and trafficking for the broader anti-trafficking community, improving the healthcare response to trafficking by leveraging the expertise of our network of health professionals. Our members include leaders from public health, international health, academia, government and clinical practice, including physicians, nurses, advance practice clinicians, public health professionals, psychologists, behavioral health professionals, social workers, and researchers.

HEAL Trafficking supports the goals of SOAR to enhance the United States health response to human trafficking through building capacity of health care providers and through health and wellness training.¹ In the advancement of SOAR and the achievement of its goals, HEAL Trafficking offers these suggestions:

1. Integration of trauma-informed care into health professional training across specialties and clinical practice. This training would improve care for survivors of violence, including trafficking, by advancing treatment approaches, preventing re-traumatization and harm, enhancing identification of survivors, and disrupting survivors' cycle of violence and trafficking.²

¹ <http://www.acf.hhs.gov/programs/endtrafficking/initiatives/soar>

² <http://www.ncbi.nlm.nih.gov/books/NBK207192/>

2. Facility-based accreditation for provision of trauma-informed care³ (including for survivors of trafficking). Implementation of this suggestion could occur in collaboration with SAMHSA-HRSA Center for Integrated Health Solutions (CIHS), SAMHSA National Center for Trauma-Informed Care (NCTIC), the National Association of Community Health Centers (NACHC), the Joint Commission for accreditation and certification, and relevant state-based agencies. This trauma-informed credentialing should include verification of competency among health providers as well as front-line staff of health facilities (i.e., security personnel, receptionists) and administrators at all levels of health care organizations.
3. Significant and sustained focus on research so that best practice models can be developed into evidence-based treatments for survivors. To improve the health of survivors of trafficking, we advocate for resources to A) identify survivor short- and long-term physical, mental, and social healthcare needs, B) understand survivor experiences and use of healthcare services, and C) elucidate knowledge and gaps in health professionals' understanding of trafficking survivors' healthcare needs.
4. Proactive legislation to improve health professional training about human trafficking specifically and violence in general, through a trauma-informed lens; to promote wide-spread implementation of successful trafficking prevention programs; and to promote comprehensive delivery of integrated health services to survivors of trafficking and other forms of violence.

As members of the SOAR National Technical Working Group, HEAL Trafficking offers support and recommendations towards the Working Group's goals:⁴

- *Supporting the development of protocols to manage and provide services to victims of human trafficking and creating a referral mechanism for health care professionals to inform and connect with law enforcement agencies, social service providers, and community-based organizations*

We strongly support the development of health system protocols to identify, care for, and refer potential victims of human trafficking, in order to address barriers health professionals face in meeting the needs of victims of trafficking. HEAL Trafficking has collected preliminary data on protocols currently in use by health organizations. We recommend that health system protocols should provide local flexibility but guide health professionals and health care facilities toward standardized and safe practices for identification, care, and referrals to local law enforcement agencies, child protection agencies, social service providers, and community-based organizations.

- *Training and educating health care providers to recognize signs of human trafficking, identify potential cases, and respond effectively*

³ <http://www.ncbi.nlm.nih.gov/books/NBK207194/>

⁴ <http://www.acf.hhs.gov/blog/2013/10/hhs-announces-new-action-on-health-and-human-trafficking-at-clinton-global>

HEAL Trafficking

Health Professional Education, Advocacy, and Linkage

We strongly support training and educating health care providers to recognize trafficked persons and respond effectively to potential cases. Such training should be grounded in a survivor- and trauma-informed approach to identifying and treating victims of violence, in general, and should build upon existing educational modalities such as those that educate providers about intimate partner violence.

- *Promoting effective, culturally relevant, and trauma-informed care to improve the short-term and long-term health of victims*

We strongly support delivery of comprehensive services that include access to both short-term and long-term care, understanding that the complex trauma associated with human trafficking may be related to many physical and mental conditions that require long-term care. Currently, most healthcare provision for victims of trafficking is short term, not well coordinated amongst multi-disciplinary providers, and poorly funded, creating a significant barrier to restoration and recovery. Integrated services for survivors of human trafficking and other forms of violence should involve A) coordination of medical and mental health care, as well as evidence based complementary and alternative healing modalities, B) treatment for substance abuse, C) enabling services including transportation, interpretation, and case management, and D) housing support and vocational training, provided through links with community agencies.

HEAL Trafficking believes the most effective way that the crime of human trafficking can be disrupted and victims identified, treated, and supported is through a government initiated, coordinated and funded plan. The SOAR to Health and Wellness Training initiative, part of the five-year Federal Strategic Action Plan on Service to Victims of Human Trafficking in the United States, is an important step towards this ultimate goal.

The success and impact of HHS's efforts in addressing the health needs of victims of trafficking will be based on the dedication of sufficient and additional resources. We strongly support the development of funding streams to sustain the provision of comprehensive, culturally relevant, survivor and trauma-informed care. We do not support unfunded mandates or other programs that would divert funding from existing programs that serve survivors of violence and other vulnerable populations.

HEAL Trafficking strongly endorses the ACF SOAR initiative and appreciates the past and present opportunities to participate in HHS's health-related efforts on trafficking. HEAL Trafficking offers its recommendations with collaborative intent. HHS has our continued support in educating the health community and advancing the nation's healthcare response to human trafficking.

Sincerely,

HEAL Trafficking Steering Committee and Working Group Leaders⁵

CC: Katherine Chon, ACF, Senior Advisor on Trafficking in Persons

⁵ For more details on HEAL Trafficking Steering Committee and Working Group Leaders, see next pages.



HEAL Trafficking Steering Committee

Susie Baldwin, MD, MPH
Los Angeles County Department of Public Health
Los Angeles, CA

Hanni Stoklosa, MD, MPH
Brigham & Women's Hospital, Harvard Medical School
FXB Center for Health & Human Rights, Harvard School of Public Health
Boston, MA

Kimberly Chang, MD
Frank Kiang Medical Center
Asian Health Services
Oakland, CA

Makini Chisolm-Straker, MD
Columbia University Medical Center
Icahn School of Medicine at Mount Sinai
New York, NY

Aimee Grace, MD, MPH
Children's National Medical Center
Washington, DC

Nicole Littenberg, MD, MPH
Pacific Survivor Center
Honolulu, Hawaii

Working Group Leaders

Advocacy

Victoria Bawel
Washington University
St Louis, MO

Vicki Rosenthal, MSW
Consultant, Educator, Researcher
Fort Lauderdale, FL

Direct Services

Jules Geynisman, MD
New York-Presbyterian - Cornell
Survivor Clinic
New York, NY

Babette Hankey, MS
Aspire Health Partners, Inc.
Orlando, Florida



Becca C. Johnson, PhD, Licensed Psychologist
Agape International Mission
Engedi Refuge
Bellingham, WA

Education & Training

Tonya Chaffee, MD, MPH
University of California – San Francisco
San Francisco General Hospital
San Francisco, CA

Jordan Greenbaum, MD
Children's Healthcare of Atlanta
Atlanta, GA

International

Katherine Welch, MD
Relentless
Thailand

Legal

Mariam Garuba, MD
Kings County Hospital
Manhattan Psychiatric Institute
Brooklyn, NY

Media & Technology

Holly Atkinson, MD
Mount Sinai Global Health
Icahn School of Medicine at Mount Sinai
New York, NY

Prevention

Tara Wilkie, RN
Fraser Health Forensic Nursing Services, Burnaby General Emergency Department
British Columbia Institute of Technology Forensic Science Department
Surrey, BC, Canada

Protocols

Jeffrey Barrows, DO, MA
Hope for Justice
Zanesfield, OH

Suzanne T. Poppema, MD
President, Zonta Everett
Edmonds, WA



Research

Roy Ahn, ScD
Massachusetts General Hospital
Boston, MA

Jennifer Makrides, MA, MD Candidate
University of Vermont
South Burlington, VT