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HUMAN TRAFFICKING

Agencies Have Taken Steps to Strengthen International Anti- trafficking Projects

Accessible Version

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GAO Highlights

Highlights of [GAO-21-53](#), a report to congressional committees

Why GAO Did This Study

Human trafficking, a multi-billion dollar industry, is a pervasive problem throughout the world. In addition to harming its victims, it imposes social and public health costs and undermines government authority.

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on programs conducted by specific agencies, including State, USAID, and DOL, which address trafficking in persons. This report (1) describes recent international anti-trafficking in persons projects that key U.S. agencies have awarded to implementing partners; (2) describes State's Program to End Modern Slavery, and the extent to which State conducted oversight for subaward selection; (3) describes agencies' U.S. international anti-trafficking project evaluation efforts, including actions agencies are taking to address challenges to such evaluations; and (4) examines the extent to which agencies used selected midterm evaluations to strengthen ongoing projects, among other things.

GAO reviewed agency policies, data, awards and other documents; conducted a literature search; and reviewed eight final evaluations and six midterm evaluations of anti-trafficking projects funded by State, USAID, and DOL that were active at any point from fiscal years 2016 through 2018. GAO conducted fieldwork in the Philippines, which it selected to observe all three agencies' anti-trafficking projects. GAO also interviewed agency officials and implementing partners.

View [GAO-21-53](#). For more information, contact Chelsa Kenney Gurkin at (202) 512-2964 or gurkinc@gao.gov.

Human Trafficking

Agencies Have Taken Steps to Strengthen International Anti-trafficking Projects

What GAO Found

The Department of State (State), the U.S. Agency for International Development (USAID), and the Department of Labor (DOL) managed 182 international anti-trafficking in persons projects, totaling at least \$316 million, during fiscal year 2018 and the first half of fiscal year 2019. These projects aim to support prosecution of perpetrators of trafficking, protect survivors, and prevent trafficking.

Indian Woman Exploited through Bonded Labor at a Brick Factory in Rural India, According to State



Source: Department of State, 2020 Trafficking in Persons Report. Photo by Reuters. | GAO-21-53

State's Program to End Modern Slavery represents a large U.S. investment to combat international human trafficking. Under this program, prime award recipients have administered 22 subawards, worth \$13.8 million, for international anti-trafficking projects and human trafficking research. For subawards reviewed, GAO found that State, among other things, had reviewed and approved country selection, industry selection, and subaward recipients.

Agencies are taking steps to address challenges to evaluating international anti-trafficking projects and have completed final evaluations that examine project effectiveness. Despite longstanding challenges to evaluating anti-trafficking projects, given the sensitivities of human trafficking, agencies are taking steps to improve data, resources, and project design. In addition, State, USAID, and DOL completed a total of eight final evaluations of their anti-trafficking projects that were active from fiscal years 2016 through 2018 and provided information on the extent to which these projects achieved their objectives. For example, the final evaluations identified project achievements related to improved awareness, collaboration, and institutional capacity, among other things. They also identified project challenges, such as limited resources.

State, USAID, and DOL generally followed their policies for using midterm evaluation findings and recommendations to strengthen ongoing projects. Specifically, the agencies used midterm evaluations to make course corrections to improve project performance. For example, State provided additional funding and a time extension to an implementing partner, in response to a midterm evaluation recommendation. Continuing to follow their policies for using evaluations could help the agencies better address impediments, manage foreign assistance, and meet their programmatic goals.

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Abbreviations

ADS	<i>Automated Directives System</i>
DOD	Department of Defense
DOL	Department of Labor
DRG Center	Center of Excellence on Democracy, Human Rights and Governance
DRL	Bureau of Democracy, Human Rights, and Labor
FAM	<i>Foreign Affairs Manual</i>
GFEMS	Global Fund to End Modern Slavery
ILAB	Bureau of International Labor Affairs
OCFT	Office of Child Labor, Forced Labor, and Human Trafficking
OECD/DAC	Organization for Economic Cooperation and Development / Development Assistance Committee
OMB	Office of Management and Budget
PEMS	Program to End Modern Slavery
State	Department of State
TIP Office	Office to Monitor and Combat Trafficking in Persons
Treasury	Department of the Treasury
University of Georgia	University of Georgia Research Foundation
USAID	U.S. Agency for International Development

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November 9, 2020

Congressional Committees

Trafficking in persons, or human trafficking, is a longstanding and pervasive problem throughout the world, as traffickers profit at the expense of children and adults by compelling them to work or engage in commercial sex around the world. Victims are often held against their will in slave-like conditions and forced to provide labor or perform services in garment factories, fishing boats, agriculture, domestic service, and commercial sex, among many other legal and illicit industries or sectors. In addition to inflicting grave damage upon its victims, trafficking in persons is a multi-billion dollar industry that imposes social and public health costs, undermines government authority, distorts markets, and enriches domestic and transnational organized criminal groups and gangs. According to estimates by the International Labor Organization, in 2016, there were an estimated 25 million victims of human trafficking worldwide. However, as we previously reported, estimates of the number of trafficking victims are often questionable because of data and methodological weaknesses.¹

Congress enacted the Trafficking Victims Protection Act of 2000 to combat trafficking in persons, and has reauthorized this act six times. The act, as amended, defines severe forms of trafficking in persons as (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.²

The National Defense Authorization Act for Fiscal Year 2017 included a provision for us to report on the programs conducted by the Department of State (State), the U.S. Agency for International Development (USAID), the Department of Labor (DOL), the Department of Defense (DOD), and the Department of the Treasury (Treasury) that address human trafficking

¹See GAO, *Human Trafficking: Better Data, Strategy, and Reporting Needed to Enhance U.S. Anti-trafficking Efforts Abroad*, [GAO-06-825](#) (Washington, D.C.: July 18, 2006).

²22 U.S.C. § 7102(11).

and modern slavery, including an analysis of the effectiveness of such programs.³ Three of these agencies—State, USAID, and DOL—have programs that fund projects designed to combat human trafficking. These agencies award funds to implementing partners, through contracts, grants, or cooperative agreements, and oversee and monitor these projects.⁴

This report (1) describes recent international anti-trafficking in persons projects that key U.S. agencies have awarded to implementing partners;⁵ (2) describes the funding and awards for State’s international anti-trafficking program, the Program to End Modern Slavery (PEMS), and the extent to which State conducted oversight for subaward selection under the PEMS program;⁶ (3) describes agencies’ U.S. international anti-trafficking project evaluation efforts, including actions agencies are taking to address challenges to such evaluations; and (4) examines the extent to which agencies’ policies addressed GAO leading practices for using evaluations to strengthen projects, and the extent to which agencies followed these policies for midterm evaluations.

To address our first objective, we asked State, USAID, and DOL to identify projects that (1) had an international focus; (2) were delivered by implementing partners to external recipients, such as trafficking victims or host governments, as project beneficiaries; (3) addressed trafficking in

³Under this legislative provision, we have previously reported on State’s, USAID’s, and DOL’s monitoring activities. See GAO, *Human Trafficking: State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects*, [GAO-19-77](#) (Washington, D.C.: Dec. 4, 2018).

⁴Since DOD and Treasury officials did not identify these types of projects as part of their anti-trafficking efforts, we provide background information on their efforts but do not cover these agencies in our reporting objectives.

⁵For the purposes of our reporting objectives, implementing partners include contractors, grantees, and recipients of cooperative agreements.

⁶The Code of Federal Regulations defines subaward as “an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract (2 C.F.R § 200.92). In our report, we therefore use the term “subaward” to refer to grants or contracts made under a prime award by an implementing partner.

persons, modern slavery,⁷ or forced labor; and (4) were active at any point during fiscal year 2018 and the first half of fiscal year 2019.⁸ We also interviewed agency officials to confirm the completeness and accuracy of project information.⁹ We included projects for which anti-trafficking in persons was a primary goal and those in which this goal was integrated within a broader project goal. For our second objective, we reviewed award data, cooperative agreements, and documentation related to State's PEMS, including subawards issued in fiscal years 2018 and 2019. We also interviewed officials from State's Office to Monitor and Combat Trafficking in Persons (State's TIP Office), implementing partners, and subawardees about PEMS programming and oversight. For our third objective, we conducted a search and screening of literature published from January 2016 to September 2019.¹⁰ We identified challenges to conducting evaluations of anti-trafficking efforts, as well as U.S. agency efforts to address some of these challenges. Further, we reviewed all eight final evaluations of U.S. anti-trafficking projects that were active at any point from fiscal years 2016 through 2018 to determine whether they were of sufficient quality and what the evaluations stated about project effectiveness, including limitations to conducting these evaluations.

⁷According to State, "trafficking in persons," "human trafficking," and "modern slavery" are used as umbrella terms to refer to both sex trafficking and compelled labor. Agency officials we met with also commented that modern slavery is not defined in law and often used interchangeably with the terms "trafficking in persons" or "human trafficking." Agencies use different terminologies to describe efforts to fight human trafficking. As the lead U.S. agency, State uses "anti-trafficking" to describe these efforts, and we use this term to describe similar efforts by other agencies.

⁸We previously reported on agencies' international anti-trafficking in persons projects in fiscal year 2017; see [GAO-19-77](#). This report covers agencies' projects since then, through the first half of fiscal year 2019.

⁹To address the mandate, we gathered and analyzed information about agencies' programs and projects. In prior GAO reports, we noted that the *Glossary of Terms Used in the Federal Budget Process* defines "program" as "generally, an organized set of activities toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities." This definition acknowledges that because the term program has many uses in practice, it does not have a standard meaning in federal law. It is used to describe an agency's mission, functions, activities, services, projects, and processes. Our report uses the term "projects" to refer to anti-trafficking in persons interventions funded by key agencies through awards made to implementing partners, though some agencies may sometimes refer to such interventions as "programs."

¹⁰This literature included scholarly and peer-reviewed publications, conference papers, dissertations, books, government reports, trade articles, and publications by nonprofits and think tanks.

For our final objective, we identified agencies' policies regarding the use of evaluations to learn about and strengthen project effectiveness. We compared these policies to our leading practices for evaluating foreign assistance. For a nongeneralizable sample of projects, we assessed the extent to which agencies followed these policies with recently completed mid-term evaluations to strengthen projects. We selected our sample based on characteristics including whether projects were ongoing or recently completed, and whether efforts to improve projects based on evaluation findings and recommendations would be expected. We also interviewed agency officials about steps they had taken to strengthen ongoing projects. See appendix I for more details on our scope and methodology.

We conducted this performance audit from April 2019 to September 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Human Trafficking

Human trafficking—including sex trafficking and labor trafficking—can take place anywhere in the world and occur without crossing country boundaries. State's annual *Trafficking in Persons Report* discusses the nature and extent of human trafficking. Trafficking victims include, for example, Asian and African women and men who migrate to the Persian Gulf region for domestic labor but then experience both labor trafficking and sexual abuse in the homes of their employers. Some victims are children. For example, Pakistani children as young as 5 years of age are forced to work in brick kilns, some of which are owned by government officials. Other victims are subjected to sexual exploitation. In some cases, women and girls have been bought and sold as sex slaves by members of the Islamic State. In other cases, men, women, and children have been forced to engage in commercial sex.

Traffickers force both adults and children to work in a variety of industries. See figure 1 for an example of a child who may be vulnerable to traffickers. According to State, in some communities, families force their

children to earn money by street vending, street begging, or working in unregistered factories where they are more vulnerable to traffickers.

Figure 1: A Boy Drives a Motor Taxi at a Market in Peru, Making Him More Vulnerable to Traffickers, According to State



Source: Department of State, 2020 Trafficking in Persons Report. Photo by Harold Jahnsen. | GAO-21-53

U.S. Agencies with Roles and Responsibilities Related to International Anti-trafficking in Persons

Among U.S. agencies involved in combating international trafficking in persons, State, USAID, DOL, DOD, and Treasury have various roles and responsibilities related to international anti-trafficking in persons, including some internationally focused programs and activities that do not involve awards made to implementing partners.

State

State leads the global engagement of the United States and supports the coordination of efforts across the U.S government to combat trafficking in persons. State's TIP Office, established pursuant to the Trafficking Victims Protection Act of 2000, is responsible for bilateral and multilateral diplomacy, targeted foreign assistance, and public engagement on

trafficking in persons. The office also prepares and issues the annual *Trafficking in Persons Report* to Congress, which guides the department's engagement with foreign governments on human trafficking.¹¹ The report assesses the anti-trafficking efforts of more than 180 governments and assigns them tier rankings based on the "minimum standards for the elimination of trafficking" in the Trafficking Victims Protection Act. In addition, State's TIP Office develops annual regional programming strategies, awards projects to implementing partners, oversees the project award process, and provides technical assistance to implementing partners. Other parts of State, including regional bureaus that cover geographic regions and functional bureaus that cover global issues such as human rights, are also responsible for work related to combating trafficking in persons. For example, State's Bureau for Democracy, Human Rights, and Labor (DRL) also awards projects to implementing partners that address forced labor. See figure 2 for an example of a child who was forced to beg in a town center in North Macedonia, according to State's 2020 *Trafficking in Persons Report*.

Figure 2: A Child Forced to Beg in a Busy Town Center in North Macedonia, According to State



Source: Department of State, 2020 Trafficking in Persons Report. Photo by Atsuki Takahashi. | GAO-21-53

¹¹For more information on State's *Trafficking in Persons Report*, see GAO, *Human Trafficking: State Has Made Improvements in Its Annual Report but Does Not Explicitly Explain Certain Tier Rankings or Changes*, [GAO-17-56](#) (Washington, D.C.: Dec. 5, 2016).

In 2017, State's TIP Office launched PEMS, which aims to support transformational projects that seek to achieve a measurable and substantial reduction of the prevalence of modern slavery in targeted populations within partner countries, as authorized in the fiscal year 2017 National Defense Authorization Act.¹² State's TIP Office officials told us that the program represents an unprecedented U.S. investment to combat human trafficking and provides a unique focus on efforts to better understand the prevalence of human trafficking.

USAID

USAID administers projects awarded to implementing partners that address anti-trafficking in persons, including increased investments in conflict and crisis areas, and integrates such projects into broader development projects. USAID missions manage the majority of these anti-trafficking activities through projects that address trafficking challenges specific to the mission's region or country. USAID's Center of Excellence on Democracy, Human Rights and Governance (DRG Center) in Washington, D.C. is responsible for oversight of USAID's anti-trafficking policy. The DRG Center

- is responsible for coordinating and reporting on USAID's anti-trafficking in persons efforts;
- oversees the implementation of USAID's anti-trafficking in persons policy;
- works with regional bureaus and country missions to gather anti-trafficking best practices and lessons learned;
- provides technical assistance and training to field and Washington, D.C.-based staff on designing, managing, monitoring, and evaluating anti-trafficking in persons projects; and
- conducts and manages research and learning activities related to anti-trafficking in persons.

DOL

Within DOL, the Bureau of International Labor Affairs' (ILAB) Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) conducts research, publishes reports, and administers projects awarded to

¹²22 U.S.C. § 7114(b).

implementing partners on international child labor, forced labor, and trafficking in persons. ILAB's reports include the annual *Findings on the Worst Forms of Child Labor* report, which assesses the efforts of approximately 131 countries and territories to eliminate the worst forms of child labor in the areas of laws and regulations, institutional mechanisms for coordinating and enforcement, and government policies and programs. In its *List of Goods Produced by Child Labor or Forced Labor*, ILAB also reports on source countries and goods that it has reason to believe are produced by child labor or forced labor in violation of international standards.

DOD

DOD's Combating Trafficking in Persons Program Management Office develops trafficking awareness and training materials for all DOD components.¹³ The Program Management Office has designed and developed several different training modules to provide an overview of trafficking in persons (including signs of trafficking, key policies and procedures, and reporting procedures), as well as awareness materials for distribution to DOD components and defense contractors overseas.¹⁴

Treasury

Treasury has activities, but not specific programs, that may support wider U.S. efforts to address anti-trafficking in persons, according to Treasury officials. Pursuant to its mission, components of Treasury's Office of Terrorism and Financial Intelligence—including the Financial Crimes Enforcement Network, Office of Terrorist Financing and Financial Crimes, Office of Foreign Assets Control, and Office of Intelligence and Analysis—

¹³DOD Instruction 2200.01, issued in February 2007 and most recently updated in June 2019, establishes the agency's policy to combat trafficking in persons. The instruction establishes training requirements and outlines key responsibilities for DOD components.

¹⁴For more information on DOD's and other agencies' oversight of contractors' use of foreign workers, see GAO, *Human Trafficking: Oversight of Contractors' Use of Foreign Workers in High-Risk Environments Needs to Be Strengthened*, [GAO-15-102](#) (Washington, D.C.: Nov. 18, 2014).

work on addressing illicit finance activities that support the wider goal of combating global trafficking in persons.¹⁵

Evaluations of Foreign Assistance Programs

According to the Foreign Aid Transparency and Accountability Act of 2016, evaluation is the systematic collection and analysis of information about the characteristics and outcomes of a program, as a basis for (1) making judgments and evaluations regarding the program, (2) improving program effectiveness, and (3) informing decisions about current and future programming. Evaluations may examine program or project processes, outcomes, or impacts.¹⁶

State, USAID, and DOL have policies for evaluating their foreign assistance¹⁷ that enable them to learn about project effectiveness.¹⁸ See appendix II for agencies' evaluation use policies.

¹⁵For example, according to Treasury officials, the Office of Terrorism and Financial Intelligence contributed to a report on financial flows associated with human trafficking. In 2014, the Financial Crimes Enforcement Network issued an advisory note to financial institutions, including descriptions of indicators used to identify human trafficking. The Office of Foreign Assets Control applies financial sanctions and oversees a range of global sanctions programs that target human trafficking activity, including programs focused on human rights and corruption.

¹⁶Process evaluations assess the extent to which a program is operating as it was intended. Outcome evaluations assess the extent to which a program achieves its outcome-oriented objectives, focusing on outputs and outcomes. Impact evaluations assess the net effect of a program by comparing program outcomes with an estimate of what would have happened in the absence of the program. See GAO, *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-11-646SP](#) (Washington, D.C.: May 2, 2011).

¹⁷We previously reported that State's and USAID's evaluation policies incorporated OMB's *Monitoring and Evaluation Guidelines* (M-18-04) and addressed all 14 leading evaluation principles. See GAO, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices*, [GAO-19-466](#) (Washington, D.C.: July 31, 2019) and *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: Sept. 27, 2016).

¹⁸In 2002, the Organization for Economic Cooperation and Development (OECD) / Development Assistance Committee (DAC) defined effectiveness as the extent to which an intervention's objectives were achieved or are expected to be achieved. In 2019, it updated the definition to "the extent to which an intervention achieved, or is expected to achieve, its objectives and its results, including any differential results across groups." See OECD/DAC, *Glossary of Key Terms in Evaluation and Results-Based Management* (2002) and *Better Criteria for Better Evaluation: Revised Evaluation Criteria, Definitions, and Principles for Use* (2019).

Agencies' Approach to International Anti-trafficking Project Design

According to officials, State, USAID, and DOL generally design projects to align with the “3Ps approach”—prosecution, protection, and prevention—and to consider trends and recommendations identified in agency reports on foreign governments’ anti-trafficking efforts. According to State, the 3Ps approach serves as the fundamental framework used around the world to combat human trafficking, and the U.S. government follows this approach to prevent trafficking in persons through public awareness, outreach, education, and advocacy campaigns.

The 3Ps approach involves the following steps:

- **Prosecution.** Investigate and prosecute trafficking in persons crimes and convict and sentence traffickers by providing training and technical assistance for law enforcement officials, such as police, prosecutors, and judges, and promote laws and policies that enable governments to hold traffickers accountable.
- **Protection.** Identify, protect and assist victims by providing comprehensive services, including shelters as well as health, psychological, legal, and vocational services, using a trauma-informed approach.
- **Prevention.** Prevent trafficking in persons through public awareness, outreach, education, and advocacy campaigns across a range of stakeholders.

In addition to the 3Ps, a fourth “P”—for partnership—serves as a complementary means to achieve progress across the 3Ps and enlist all segments of society in the fight against human trafficking, according to State.

State, USAID, and DOL Managed 182 International Anti-trafficking Projects Totaling at Least \$316 Million during Our Period of Review

State, USAID, and DOL managed 182 international anti-trafficking in persons projects carried out by implementing partners that were active at any point during fiscal year 2018 and the first half of fiscal year 2019,

Appendix I: Objectives, Scope, and Methodology

totaling at least \$316 million in related award funding.¹⁹ These projects, identified by agency officials, included those focused primarily on trafficking in persons, to those in which combating trafficking in persons was integrated into, but was not the primary focus of, the project.²⁰ In addition, the projects also ranged from those focused on individual countries, to regional and global projects that covered several countries. Of the three agencies, State had the most anti-trafficking in persons projects and the highest funding levels, followed by USAID and DOL. (See table 1.) Appendix III provides more detailed information on these projects.

Table 1: Summary of State, USAID, and DOL Anti-trafficking in Persons Projects Active at Any Point during Fiscal Year 2018 and the First Half of Fiscal Year 2019, as Identified by Agency Officials

Responsible agency / office	Total number of projects	Locations of projects	Award funding (dollars in millions)
State (total)	119		160.1
State TIP Office	113	17 global projects 17 regional projects 79 projects that cover 53 different countries	153.2
State/DRL	6	1 regional project 5 projects that cover 4 different countries	6.9
USAID/DRG and overseas missions	46	1 global project 2 regional projects 43 projects that cover 25 different countries	95.8 ^a
DOL	17	6 global projects 4 regional projects 7 projects that cover 7 individual countries	60.3 ^b
Total (all agencies)	182		316.2

Legend: State TIP Office = State's Office to Monitor and Combat Trafficking in Persons; State/DRL = State's Bureau of Democracy, Human Rights, and Labor; USAID/DRG = USAID's Center of Excellence on Democracy, Human Rights and Governance.

Source: GAO analysis of information provided by the Department of State (State), U.S. Agency for International Development (USAID), and Department of Labor (DOL). | GAO-21-53

Notes: Global projects refer to projects active in two or more countries on more than one continent. Regional projects refer to projects in more than one country, but in a close geographic proximity. DOL

¹⁹For two DOL projects totaling \$3.8 million that addressed efforts to combat child labor and human trafficking, DOL could not isolate the specific funding amount designated for anti-trafficking activities. Therefore, we did not include the \$3.8 million in the total funding reported for DOL projects. As a result, the total amount of DOL anti-trafficking funding we report may be up to \$3.8 million greater than the award amount we report for DOL.

²⁰According to State, all of State's projects were solely focused on anti-trafficking efforts. USAID and DOL projects primarily focused on anti-trafficking efforts, but also included projects where anti-trafficking efforts were incorporated into broader goals, according to agency officials.

and USAID projects in the table, as identified by agency officials, ranged from those that focused on anti-trafficking in persons, to those in which anti-trafficking in persons efforts were integrated into, but were not the primary focus of, the projects.

^aUSAID funding includes projects that focused solely on anti-trafficking in persons issues, as well as the anti-trafficking portion of broader projects.

^bDOL provided funding data for projects that incorporated anti trafficking efforts into broader projects. For two DOL projects totaling \$3.8 million that addressed efforts to combat child labor and human trafficking, DOL could not isolate the specific funding amount designated for anti-trafficking activities. Therefore, we did not include the \$3.8 million in the total funding reported for DOL projects. As a result, the total amount of DOL anti-trafficking funding we report may be up to \$3.8 million greater than the award amount we report for DOL.

State

State's TIP Office managed 113 projects with total funding of over \$153 million. These projects had awarded amounts ranging from \$150,000 to \$25 million per project. According to State officials, all of these projects focused on anti-trafficking efforts.

- **Global projects.** State's TIP Office managed 17 global projects totaling almost \$63 million; two projects with award amounts of \$25 million and \$21 million accounted for almost 75 percent of this global project award funding. These two projects were awards made under PEMS to fund activities that seek to achieve a measurable and substantial reduction of the prevalence of modern slavery in specific countries. The other State TIP Office global projects included efforts to improve research and data collection for human trafficking projects.
- **Regional projects.** State's TIP Office managed 17 regional projects totaling over \$16 million. Of the 17 regional projects, nine were in Africa and totaled over \$10 million. The 17 regional projects included building capacity in judicial sectors to improve services to human trafficking victims and support enforcement and prosecution of human trafficking cases. See the sidebar for a description of a State TIP Office regional project.
- **Country-level projects.** State's TIP Office awarded almost half of its funding—over \$74 million—to 79 projects in 53 different countries. With regard to those 53 countries, State's TIP office awarded the highest levels of project award funding to support Child Protection Compact Partnership projects in Peru (\$7.4 million), Ghana (\$6.9 million), Jamaica (\$5.1 million), the Philippines (\$4.8 million), as well as bilateral projects in India (\$2.9 million), and Thailand (\$2.6 million). For example, State's TIP Office has a project in India designed to ensure that government authorities enforce a law to abolish bonded labor. Figure 3 shows a survivor of bonded labor in India, according to State's 2020 *Trafficking in Persons Report*.

State TIP Office Regional Project Example

State TIP Office's regional project, Strengthening Services for Victims of Human Trafficking, provided a \$1.25 million award to improve the capacity of governments, civil society, and communities to protect and provide comprehensive services for survivors of human trafficking in Nigeria and Cameroon. The project focused on former child soldiers and women and girls trafficked by combatants for forced labor or sexual exploitation.

Source: GAO analysis of the Department of State's Office to Monitor and Combat Trafficking in Persons (State's TIP Office) documents. | GAO-21-53

Figure 3: Indian Woman Exploited through Bonded Labor at a Brick Factory in Rural India, According to State



Source: Department of State, 2020 Trafficking in Persons Report. Photo by Reuters. | GAO-21-53

State's TIP Office Child Protection Compact Partnership projects in Peru, Ghana, Jamaica, and the Philippines establish partnerships between implementing partners and local government to combat child trafficking, according to State officials.²¹ For example, State's Child Protection Compact Partnership with the Philippines is a 4-year project to increase prevention efforts and protections for child victims of online sexual exploitation and labor trafficking in the Philippines, and to hold perpetrators of these crimes accountable.

State DRL managed six projects, totaling nearly \$7 million. State DRL managed one Africa regional project, two projects in Mauritania, and one project each in Senegal, Mali, and Iraq. State DRL projects mostly focused on the eradication of slavery in African countries, and the reintegration of former slaves back into society.

²¹According to State, a Child Protection Compact is a multi-year plan developed jointly by the United States and a particular country, documenting the commitment of the two governments to prosecute and convict child traffickers, provide comprehensive trauma-informed care for child trafficking victims, and prevent child trafficking in all its forms.

USAID

During fiscal year 2018 and the first half of fiscal year 2019, USAID's DRG Center and USAID missions managed 46 projects, totaling nearly \$96 million. USAID projects included those that were focused primarily on anti-trafficking in persons (25 projects), as well as projects that integrated anti-trafficking efforts into a broader project goal (21 projects).²²

- **Global projects.** USAID's one global project was an integrated project called the "Global Labor Program" with an anti-trafficking component of \$2.5 million. The goals for the project are to build the capacity of worker organizations, promote human rights, and support good governance by promoting access to justice for workers. Part of these efforts include the promotion of gender equality and ensuring the rights of vulnerable populations such as migrants and those working in the informal economic sector.
- **Regional projects.** USAID managed two regional projects, which totaled \$25.8 million in anti-trafficking in persons funding and covered countries in the Asia Pacific and Central Asia regions. For example, a 5-year regional project awarded \$21.5 million to reduce trafficking in persons in the Asia-Pacific region through coordinated action by governments, civil society and businesses. The project goals include improving cross-border cooperation, applying best practices for victim identification, and providing services.

²²For integrated projects, USAID was able to identify the anti-trafficking-related funding component.

USAID Country-Level Project Example

Through the Philippines-American Fund as its implementing partner, USAID awarded six grants to combat trafficking in persons in the Philippines. According to USAID, one of the grants supported a local organization operating a shelter for trafficked children in one of the country's known trafficking hotspots. The shelter has supported 70 children since receiving the \$440,000 grant in 2014. The photo shows a bedroom for trafficked children.



Source: GAO analysis of U.S. Agency for International Development (USAID) documents. | GAO-21-53

- **Country-level projects.** USAID awarded most of its anti-trafficking funding—\$67.5 million—to 43 projects covering 27 different countries. USAID country-level projects included four in the Dominican Republic, funded at \$7.75 million; four in Nepal, funded at over \$5 million; and five in Burma, funded at \$3.2 million. See the sidebar for a description of a USAID country project.

DOL

During fiscal year 2018 and the first half of fiscal year 2019, DOL managed 17 projects totaling at least \$60 million in award funding. DOL-identified projects included some that were focused primarily on anti-trafficking in persons (12 projects), as well as others that integrated anti-trafficking efforts into a broader project goal (five projects).

DOL Global Project Example

DOL's global project "From Protocol to Practice: A Bridge to Global Action on Forced Labor," worth \$14.4 million, intends to strengthen global and country-level efforts to eliminate forced labor in Mauritania, Nepal, Peru, Malaysia, Niger, Thailand, and the Dominican Republic. To achieve these goals, the project aims to establish responsive national policies on forced labor and obtain the support of worker and employer organizations to combat forced labor.

Source: GAO analysis of Department of Labor (DOL) documents. | GAO-21-53

- **Global projects.** DOL's six global projects totaled at least \$21.9 million in anti-trafficking-related award funding, with one project representing \$14.4 million (over 60 percent) of this amount.²³ See the sidebar for more information on DOL's largest global project.
- **Regional projects.** DOL's four regional projects totaled nearly \$20 million in anti-trafficking award funding. DOL funded three regional projects in Latin America and one in Southeast Asia. In Latin America, DOL funded a \$2 million project to address child labor and forced labor in the coffee industry.
- **Country-level projects.** DOL's seven country-level projects totaled nearly \$19 million in anti-trafficking award funding. For example, a project in the Philippines focuses on combating forced labor and human trafficking on fishing vessels by strengthening government enforcement capacity and building engagement among fishers, the private sector, and civil society.

State Met Its Subaward Selection Oversight Responsibilities under the Program to End Modern Slavery, for Subawards We Reviewed

State's TIP Office Has Awarded \$75 Million under the Program to End Modern Slavery to Implement International Anti-trafficking Projects and Conduct Research

Over 30 percent of State's TIP Office's total funding for international anti-trafficking projects in fiscal year 2018 and the first half of fiscal year 2019, discussed earlier, has been awarded under PEMS. State's TIP Office has awarded \$75 million in funding to three prime award recipients—the

²³For two DOL projects totaling \$3.8 million that addressed efforts to combat child labor and human trafficking, DOL could not isolate the specific funding amount designated for anti-trafficking activities. Therefore, we did not include the \$3.8 million in the total funding reported for DOL projects. As a result, the total amount of DOL anti-trafficking funding we report may be up to \$3.8 million greater than the award amount we report for DOL.

Global Fund to End Modern Slavery (GFEMS),²⁴ the University of Georgia Research Foundation (University of Georgia),²⁵ and the Freedom Fund²⁶—and one external evaluator²⁷ under PEMS in fiscal years 2018 through 2020.²⁸ This amount represents 60 percent of the \$125 million in funding State has allocated pursuant to congressional appropriations for the program for fiscal years 2016 through 2020.²⁹ State’s TIP Office awarded this funding to prime award recipients in three rounds, known as PEMS 1, PEMS 2, and PEMS 3.³⁰ See figure 4 for a summary of PEMS funding.

²⁴GFEMS is an international fund that aims to develop a global strategy to end modern slavery by increasing resources, engaging government and the private sector, and funding new programs and technologies, among other things. According to State’s TIP Office, GFEMS was established in 2015.

²⁵The Africa Programming and Research Initiative to End Slavery, an international consortium of researchers and policy advocates from the University of Georgia and University of Liverpool, manages the University of Georgia’s PEMS awards. According to representatives, the initiative, established in 2014, aims to reduce the prevalence of modern slavery in sub-Saharan Africa by strengthening the capacity of community organizations to implement prevention, prosecution, and protection strategies.

²⁶The Freedom Fund, established in 2013, aims to end modern slavery by investing in frontline efforts in countries and sectors where human trafficking is most prevalent.

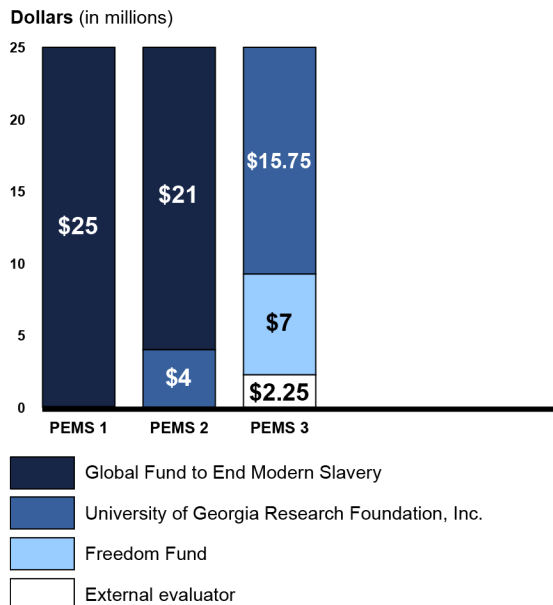
²⁷According to State’s TIP Office officials, the external evaluator will review selected components of GFEMS’s first PEMS award, such as strategies related to prevalence research and programming.

²⁸We report funds for these projects that were awarded in fiscal years 2018 through 2020, which include funds appropriated in prior fiscal years and obligated in fiscal years 2018 through 2020.

²⁹Pursuant to congressional appropriations, State allocated \$25 million in funding for PEMS for each of those 5 years. State’s TIP Office officials told us that they plan to select the fourth round of awards (known as PEMS 4) by October 2020, and thereby apply \$25 million of the funding that Congress appropriated in fiscal year 2019. State’s TIP Office officials stated that future awards would apply \$25 million of the funding that Congress appropriated in fiscal year 2020.

³⁰State’s TIP Office officials told us that they selected PEMS prime award recipients through a proposal review process that included feedback from multiple stakeholders, including representatives from State regional bureaus, relevant U.S. embassy officials, USAID, and DOL. According to State’s TIP Office officials, the PEMS 1 award began in fiscal year 2018 and applied \$25 million in funding that Congress appropriated in fiscal year 2016, the PEMS 2 awards began in fiscal year 2019 and applied \$25 million in funding that Congress appropriated in fiscal year 2017, and the PEMS 3 awards began in fiscal year 2020 and applied \$25 million in funding that Congress appropriated in fiscal year 2018.

Figure 4: Department of State’s Program to End Modern Slavery (PEMS) Prime Award Recipients



Note: Department of State’s Office to Monitor and Combat Trafficking in Persons awarded funding under PEMS in three rounds, known as PEMS 1, PEMS 2, and PEMS 3. We report funds for these projects that were awarded in fiscal years 2018 through 2020, which include funds appropriated in prior fiscal years and obligated in fiscal years 2018 through 2020.

Source: GAO analysis of information provided by the Department of State. | GAO-21-53

See table 2 for a description of prime award recipients’ efforts under PEMS.

Table 2: Prime Award Recipients’ Efforts under the Department of State’s Program to End Modern Slavery (PEMS)

Prime award recipient	Description of planned efforts	Country
Global Fund to End Modern Slavery (GFEMS)	<ul style="list-style-type: none"> Administer anti-trafficking projects and prevalence research related to migrant labor, sex trafficking, apparel and footwear industries, and the construction industry. Leverage federal resources under PEMS to draw additional donors to address human trafficking and share data, analysis, and promising practices. For example, according to GFEMS, the governments of the United Kingdom and Norway awarded GFEMS \$27 million and \$11.6 million in funding, respectively. 	India, the Philippines, Vietnam, Kenya, and Uganda
University of Georgia Research Foundation	<ul style="list-style-type: none"> Administer anti-trafficking projects and prevalence research related to child labor and sex trafficking. Develop methodologies to measure prevalence through the Prevalence Reduction Innovation Forum. 	Sierra Leone, Guinea, and Senegal
Freedom Fund	<ul style="list-style-type: none"> Administer anti-trafficking projects and prevalence research related to forced labor. 	Ethiopia

Source: GAO summary of information provided by the Department of State. | GAO-21-53

State's TIP Office officials said that PEMS relies on subawards—grants or contracts administered by the prime award recipient—to implement specific anti-trafficking projects.³¹ The officials said that subawards enable local organizations with existing relationships and knowledge about their communities to access PEMS resources and implement programs. As such, prime award recipients administer subawards to (1) implement anti-trafficking in persons projects and (2) conduct human trafficking research that supports project efforts. For fiscal years 2018 and 2019, prime award recipients issued 22 subawards worth \$13.8 million for anti-trafficking projects and human trafficking research.³² This amount represents nearly 19 percent of the \$72.75 million awarded to PEMS prime award recipients.³³ See table 3 for a list of PEMS subawards issued in fiscal years 2018 and 2019.

³¹According to funding opportunity terms for PEMS 1 through PEMS 3 awards, selected applicants will not directly implement anti-trafficking projects under PEMS, but instead will administer subawards to implement such projects. State's TIP Office officials told us that that prime award recipients selected under the fourth round of PEMS awards (known as PEMS 4) may directly implement anti-trafficking projects.

³²This subaward count and funding amount includes almost \$90,000 in funding disbursed (of the approximately \$630,000 award) for a GFEMS subaward that, according to State's TIP Office, was cancelled because the subawardee did not fully adhere to the subaward's terms and conditions. For fiscal years 2018 and 2019, PEMS prime award recipients had also issued 12 subawards (11 contracts and one subgrant), worth \$2.62 million, for operational support, such as country coordinators and advisory services. GFEMS issued 11 contracts for operational support, worth \$2.37 million, under its PEMS 1 and PEMS 2 awards. The University of Georgia issued one subgrant for operational support, worth approximately \$250,000, under its PEMS 2 award.

³³State's TIP Office approved an 18-month no-cost extension for GFEMS's PEMS 1 award to provide more time to implement anti-trafficking projects. State's TIP Office officials said that GFEMS plans to award anti-trafficking projects over two rounds under its PEMS 1 award; this schedule enables current subawardees (selected during GFEMS's first round of subawards) to submit proposals to expand their efforts. In December 2019, GFEMS issued its solicitation for the second (and final) round of subawards under its PEMS 1 award; it plans to award \$3.4 million in funding. As of August 2020, State's TIP Office officials told us that GFEMS had selected two subawards. In April 2020, GFEMS issued a solicitation for anti-trafficking projects in Kenya and Uganda under its PEMS 2 award; it plans to award \$10 million in funding. As of August 2020, State's TIP Office officials told us that GFEMS was in the process of selecting subawards.

Appendix I: Objectives, Scope, and Methodology

Table 3: Department of State’s (State) Program to End Modern Slavery (PEMS) Subawards Issued by Prime Award Recipients in Fiscal Years 2018 and 2019, as Identified by State

Prime award recipient	Cooperative agreement	Funding mechanism	Anti-trafficking projects Number of subawards	Anti-trafficking projects Funding (dollars)	Human trafficking research Number of subawards	Human trafficking research Funding (dollars)	Operational support Number of subawards	Operational support Funding (dollars)	Total funding (dollars)
Global Fund to End Modern Slavery	PEMS 1	Subgrants	12	9.47 million	0	0	0	0	9.47 million
		Contracts	1	414,742	7	3.24 million	8	1.68 million	5.34 million
		Total	13	9.89 million	7	3.24 million	8	1.68 million	14.81 million
	PEMS 2	Subgrants	0	0	0	0	0	0	0
		Contracts	0	0	0	0	3	687,286	687,286
		Total	0	0	0	0	3	687,286	687,286
University of Georgia Research Foundation	PEMS 2	Subgrants	0	0	1	652,022	1	253,860	905,882
		Contracts	0	0	1	20,000	0	0	20,000
		Total	0	0	2	672,022	1	253,860	925,882
Total			13	9.89 million	9	3.92 million	12	2.62 million	16.43 million

Source: GAO analysis of information provided by State. | GAO-21-53

Notes: Numbers may not sum to totals because of rounding. We did not review subawards issued by the University of Georgia Research Foundation or Freedom Fund under their PEMS 3 cooperative agreements because they were outside our period of review of awards made in fiscal years 2018 and 2019. The subaward count and funding amount for the Global Fund to End Modern Slavery’s anti-trafficking projects under its PEMS 1 cooperative agreement includes almost \$90,000 in funding disbursed (of the approximately \$630,000 award) for a subaward that State’s Office to Monitor and Combat Trafficking in Persons said it cancelled because the subawardee did not fully adhere to the subaward’s terms and conditions.

Anti-trafficking in persons projects. GFEMS had issued 13 subawards (12 subgrants and one contract) for eight anti-trafficking projects, worth \$9.89 million, as of September 30, 2019.¹ These projects address the 3 Ps of anti-trafficking efforts—prosecution, protection, and prevention. For example, an anti-trafficking project in the Philippines focuses on the protection of female migrant domestic workers who have experienced trafficking overseas. Subawardee representatives said that this project established an interagency task force that provides comprehensive

¹This project count and funding amount include almost \$90,000 in funding disbursed (of the approximately \$630,000 award) for the GFEMS subaward that State’s TIP Office told us it had cancelled.

reintegration assistance to trafficking survivors, such as legal services, skills training, and employment counseling. Beneficiaries told us that the project was one of the only sources of support for them upon returning to the Philippines after experiencing abusive conditions in other countries. See appendix IV for more information about GFEMS's eight anti-trafficking projects.

As of September 30, 2019, the University of Georgia and Freedom Fund had not issued subawards for anti-trafficking projects.²

Human trafficking research. Prime award recipients had issued nine subawards worth \$3.92 million, for human trafficking research, as of September 30, 2019.³ This research focuses on measuring the prevalence of human trafficking in specific countries, communities, and industries worldwide, as well as producing data, analysis, and evaluations of anti-trafficking efforts. For example, GFEMS issued a subaward to produce a methodology for measuring efforts to deter the commercial exploitation of children in India. The University of Georgia issued a subaward to develop prevalence estimates of child labor and sex trafficking in parts of Sierra Leone and Guinea. The subawardee told us the prevalence estimates will not only inform anti-trafficking project design, but also establish a baseline against which the University of Georgia's progress toward reducing the prevalence of human trafficking under its PEMS 2 award can be measured.⁴

²In April 2020, the University of Georgia published its solicitation for anti-trafficking projects in Sierra Leone and Guinea under its PEMS 2 award. As of August 2020, State's TIP Office officials told us that the University of Georgia was in the process of selecting subawards. Further, the Freedom Fund's and the University of Georgia's PEMS 3 awards began outside our period of review (fiscal years 2018 and 2019) and as such, we did not review subawards issued under these awards.

³In fiscal years 2018 and 2019, GFEMS issued seven contracts for human trafficking research under its PEMS 1 award and the University of Georgia issued one subgrant and one contract for human trafficking research under its PEMS 2 award.

⁴According to the subaward agreement, the subawardee is responsible for collecting baseline prevalence data and endline prevalence data, as well as conducting the project evaluations for the University of Georgia's anti-trafficking projects issued under its PEMS 2 award.

State's TIP Office Met Its Oversight Responsibilities for Subaward Selection under the Program to End Modern Slavery for Fiscal Years 2018 and 2019

We found that State's TIP Office met its oversight responsibilities for PEMS subaward selection for fiscal years 2018 and 2019. State's TIP Office administers PEMS awards through cooperative agreements with prime award recipients, which establish the office's oversight responsibilities to review and approve subaward selection, among other things.⁵ State's TIP Office officials said that the office assumed oversight of subaward selection because PEMS represents a high-dollar investment and relies on subawards for implementation. Dependent on the cooperative agreement, State's TIP Office is responsible for reviewing and approving (1) the selection of countries for programming; (2) the selection of subgrant recipients; and (3) contracts for prevalence studies, including scopes of work and budgets.⁶

Only for GFEMS, cooperative agreements specify that State's TIP Office is responsible for (1) participating on GFEMS's board and technical review panel,⁷ (2) reviewing and approving the selection of industries for

⁵In addition to overseeing subaward selection, cooperative agreements provide for substantial involvement between State and the prime award recipients, outlining State's TIP Office's oversight responsibilities, as appropriate, including: (1) ensuring that PEMS-funded activities comply with U.S. regulations, (2) reviewing and approving training materials, (3) hosting bi-weekly calls with prime award recipients, (4) approving methodologies for measuring prevalence, (5) consulting with prime award recipients about strategies for monitoring and evaluation, (6) organizing a process to coordinate activities among PEMS prime award recipients, (7) tracking GFEMS's donor-leveraging efforts, and (8) consulting with GFEMS in the development of decision-making processes. We did not review the extent to which State met these other oversight responsibilities; we focused on subaward selection since subawards are a central feature of PEMS awards.

⁶State's TIP Office is responsible for reviewing and approving contracts for prevalence studies conducted under PEMS 2 and PEMS 3 but not PEMS 1 awards. State's TIP Office officials stated that they added this responsibility to all subsequent agreements to provide for oversight of all prevalence studies issued by prime award recipients as contracts or subgrants. For example, GFEMS issued a contract, originally worth \$2.25 million, for prevalence studies under its PEMS 1 award.

⁷State's TIP Office officials told us that they included this responsibility in GFEMS's cooperative agreements because GFEMS indicated its board would include State's TIP Office representation in its original proposal. In addition, State's TIP Office officials told us that they thought it was appropriate to exercise oversight through board participation, given the \$46 million in funding awarded to GFEMS.

programming, and (3) approving GFEMS's guidelines for developing proposals with selected applicants.⁸

State's TIP Office has developed standard operating procedures that detail how the office implements its oversight responsibilities for PEMS subaward selection.

We found that State's TIP Office met its oversight responsibilities for PEMS subaward selection outlined in cooperative agreements for all 15 subawards, worth \$10.4 million, issued during our period of review.⁹ Table 4 provides information on the PEMS subawards we reviewed to determine the extent to which State's TIP Office met its oversight responsibilities for PEMS subaward selection in fiscal years 2018 and 2019.

⁸State's TIP Office officials stated that they included additional responsibilities for GFEMS to reflect the organization's internal processes. For example, GFEMS works with selected applicants to develop final project proposals over a 6 to 8 week period, known as co-creation. Under GFEMS's PEMS 2 cooperative agreement, State's TIP Office is responsible for approving co-creation guidelines. We did not review the extent to which State's TIP Office met this responsibility because GFEMS had not issued subawards under its PEMS 2 award, as of September 30, 2019.

⁹This group of subawards does not reflect all 34 subawards that prime award recipients issued in fiscal years 2018 and 2019 because we reviewed the subawards that State's TIP Office was responsible for overseeing according to the PEMS cooperative agreements under which the subawards were made. As such, we reviewed the 12 subgrants (for projects) issued by GFEMS under its PEMS 1 award and two subgrants (for research and operational support, respectively) issued by the University of Georgia under its PEMS 2 award because State's TIP Office was responsible for reviewing and approving subgrant recipients under the PEMS 1 and PEMS 2 cooperative agreements. We also reviewed the one contract for a prevalence study issued by the University of Georgia under its PEMS 2 award because State's TIP Office was responsible for reviewing and approving contracts for prevalence studies under the PEMS 2 cooperative agreement. For the other 19 subawards issued during our period of review, State's TIP Office did not have oversight responsibilities for subaward selection according to the terms of the relevant cooperative agreements.

Appendix I: Objectives, Scope, and Methodology

Table 4: Department of State’s (State) Program to End Modern Slavery (PEMS) Subawards Relevant for Subaward Selection Oversight by State’s Office to Monitor and Combat Trafficking in Persons in Fiscal Years 2018 and 2019, as Identified by State^a

Prime award recipient	Cooperative agreement	Funding mechanism	Anti-trafficking projects Number of subawards	Anti-trafficking projects Funding (dollars)	Human trafficking research Number of subawards	Human trafficking research Funding (dollars)	Operational support Number of subawards	Funding (dollars)	Total funding (dollars)
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		Contracts	1	414,742	7	3.24 million	8	1.68 million	5.34 million
		Total	13	9.89 million	7	3.24 million	8	1.68 million	14.81 million
	PEMS 2	Subgrants	0	0	0	0	0	0	0
		Contracts	0	0	0	0	3	687,286	687,286
		Total	0	0	0	0	3	687,286	687,286
University of Georgia Research Foundation	PEMS 2	Subgrants	0	0	1	652,022	1	253,860	905,882
		Contracts	0	0	1	20,000	0	0	20,000
		Total	0	0	2	672,022	1	253,860	925,882
Total			13	9.89 million	9	3.92 million	12	2.62 million	16.43 million

Legend: We reviewed those subawards within the red outlines.

Source: GAO analysis of information provided by State. | GAO-21-53

Notes: Numbers may not sum to totals because of rounding. We did not review subawards issued by the University of Georgia Research Foundation or Freedom Fund under their PEMS 3 cooperative agreements because they were outside our period of review of awards made in fiscal years 2018 and 2019. The subaward count and funding amount for the Global Fund to End Modern Slavery’s anti-trafficking projects under its PEMS 1 cooperative agreement includes almost \$90,000 in funding disbursed (of the approximately \$630,000 award) for a subaward that State’s Office to Monitor and Combat Trafficking in Persons said it cancelled because the subawardee did not fully adhere to the subaward’s terms and conditions.

^aWe reviewed those subawards for which State’s Office to Monitor and Combat Trafficking in Persons had oversight responsibilities for subaward selection, according to the cooperative agreements under which the subawards were issued; these subawards are outlined in red.

Country selection. State’s TIP Office reviewed and approved the selection of countries for GFEMS and the University of Georgia’s PEMS programming. Both prime award recipients told us that State’s TIP Office played a key role in this process. For example, GFEMS representatives told us that country selection was an interactive process with State’s TIP Office that led to the final selection of three countries (India, the Philippines, and Vietnam) from a list of seven for programming under its PEMS 1 award.

Subgrant recipients. State's TIP Office reviewed and approved the selection of all PEMS subgrant recipients in fiscal years 2018 and 2019. For the 12 subgrants issued by GFEMS under its PEMS 1 award, State's TIP Office reviewed subgrant concept notes and full proposals, and provided feedback and recommendations to GFEMS.¹ Moreover, State's TIP Office officials told us that GFEMS had incorporated its recommendations for selected subgrants. For example, in response to a State's TIP Office recommendation that projects related to the construction industry in India should incorporate worker protections, GFEMS had developed a memorandum to integrate worker protections into relevant subgrants.

State's TIP Office officials told us they reviewed subgrant proposals to ensure that proposed work aligned with program goals, and also shared GFEMS's subgrant proposals with stakeholders from other State offices and agencies, such as USAID, for feedback. The officials told us this review process helped ensure that subawards aligned with stakeholders' anti-trafficking priorities and did not duplicate existing efforts.

State's TIP Office also reviewed and approved the University of Georgia's subgrant recipients. However, State's TIP Office officials told us that they conducted this review during the PEMS prime award selection process because the University of Georgia had specified the two subgrant recipients in its original project proposal.

Contracts for prevalence studies. State's TIP Office reviewed and approved the contract issued by the University of Georgia for a prevalence study under its PEMS 2 award (the only contract awarded that required State's TIP Office's oversight during our period of review). State's TIP Office officials said they reviewed the scope of work to ensure that the proposed work aligned with program goals and reviewed the contract budget to determine whether costs were reasonable and allowable.

GFEMS's board and technical review panel. State's TIP Office participated on the GFEMS board and technical review panel for the 12

¹According to GFEMS, the organization selects subgrants through a multistage process that includes reviewing concept notes and full proposals. For example, GFEMS representatives told us that they worked with State's TIP Office to review and select 19 concept notes to advance to proposal development.

subgrants we reviewed.² The office established memoranda of understanding outlining its participation on the GFEMS board and technical review panel that address issues such as subaward selection decisions, meeting attendance, and communication.³ Further, as a member of the technical review panel, State's TIP Office representative rated subgrant proposals and recommended those for funding following GFEMS's processes. Similarly, as a member of the board, the Acting Director of State's TIP Office approved the final selection of subawards.

GFEMS's industry selection. State's TIP Office reviewed and approved the selection of four industries and areas—migrant labor, sex trafficking, apparel and footwear, and construction—for GFEMS's programming under its PEMS 1 award.⁴ State's TIP Office also suggested criteria for GFEMS's industry selection; for example, that the industry's willingness to work with civil society should be a selection factor.

In addition to overseeing subaward selection, State's TIP Office has conducted direct oversight for PEMS subawards. For example, State's TIP Office conducted site visits for PEMS subawards in Vietnam and the Philippines. State's TIP Office officials said that the office does not usually conduct subaward site visits, but did so because the program relies on subawards for implementation. Additionally, State's TIP Office issued a corrective action plan to a prime award recipient because of concerns related to the recipient's subaward oversight.⁵ State's TIP Office officials also told us they cancelled a PEMS subaward because the subawardee did not fully adhere to the subaward terms and conditions. Moreover, the three prime award recipients told us that State's TIP Office has been actively engaged in PEMS award implementation.

²State's TIP Office officials stated that GFEMS's technical review panel reviews and rates full proposals, moving recommendations to the GFEMS board, which makes the final selection of which proposals to fund.

³According to GFEMS, its board of directors includes six members.

⁴We did not review whether State's TIP Office reviewed and approved GFEMS's industries for programming under its PEMS 2 award because GFEMS had not issued subawards for anti-trafficking projects or prevalence studies under its PEMS 2 award, as of September 30, 2019.

⁵According to the corrective action plan documentation, the prime award recipient addressed the recommendations in the plan within 2 months. For example, the recipient developed a subaward manual that outlines subaward monitoring strategies, among other things.

Agencies Are Taking Steps to Address Challenges to Evaluating the Effectiveness of International Anti-trafficking Projects and Have Completed Final Evaluations That Identify Project Achievements

Challenges Related to Human Trafficking and Project Design Make It Difficult to Evaluate International Anti- trafficking Projects

We found a number of challenges related to human trafficking and project design that make it difficult to evaluate the effectiveness of international anti-trafficking in persons projects.⁶ In a search of scholarly literature, we found no recent publications that addressed the effectiveness of U.S. international anti-trafficking projects.⁷ Further, we found publications that noted there has been little evaluation of international anti-trafficking projects and their effectiveness, U.S.-funded or otherwise.⁸ For example, one publication stated that, in general, there had been limited efforts to comprehensively evaluate anti-trafficking projects and their effectiveness.⁹ Additionally, researchers, implementing partners, and other stakeholders that attended two agency-sponsored events in 2019

⁶Project effectiveness is the extent to which an intervention's objectives were achieved or are expected to be achieved. See OECD/DAC (2002, 2019).

⁷We previously reported that little is known about the impact of U.S. international anti-trafficking projects. See GAO, *Human Trafficking: Monitoring and Evaluation of International Projects are Limited, but Experts Suggest Improvements*, [GAO-07-1034](#) (Washington, D.C: July 26, 2007).

⁸These publications were not specific to U.S. efforts to combat international human trafficking.

⁹See Deanna Davy, "Anti-Human Trafficking Interventions: How Do We Know if They Are Working?," *American Journal of Evaluation*, Vol. 37 (4) (2016): 486-504.

also highlighted the lack of research related to the effectiveness of anti-trafficking projects.¹⁰

Agency officials described several external challenges related to human trafficking that make it difficult to evaluate international anti-trafficking projects, including:

- **Limited data.** Human trafficking-related data are limited because of several reasons, including the hidden nature of trafficking, few data sources, and access issues. Trafficking victims are a part of a hidden population. Like victims of other crimes, they may be unaware, unwilling, or unable to acknowledge that they are trafficking victims, according to agency officials. Therefore, it is difficult to reach them to collect information using standard sampling techniques. As a result, data about human trafficking are not readily available. For example, State's TIP Office and USAID officials told us that while reducing the prevalence of human trafficking is an outcome of interest for stakeholders, evaluations rarely examine prevalence as an outcome measure because prevalence data remain largely unavailable.¹¹

In addition, State's TIP Office officials said that there are few data sources on human trafficking, such as data sources for the number of trafficking-related prosecutions or number of survivors receiving support services. For example, service providers may be unwilling to share data because of privacy concerns. In addition, USAID officials told us that access to government data may depend on local governments' willingness to share data with the U.S. government and implementing partners. As a result, State's TIP Office officials told us that it is difficult to establish project baselines that identify the situation prior to the project and against which progress can be assessed. As such, evaluators may not be able to compare project baselines to final

¹⁰We attended the two agency-sponsored events: (1) USAID's "2019 Counter-trafficking in Persons Evidence Summit" on October 29-30, 2019 in Washington, D.C., and (2) DOL's Bureau for International Labor Affairs' "Impact to Action Results Event: The Frontiers of Evaluation Research on Child Labor, Forced Labor, and Human Trafficking" on November 13-14, 2019 in Washington, D.C.

¹¹We previously reported that estimates of the number of trafficking victims that exist are questionable because of data and methodological weaknesses; see [GAO-06-825](#). Additionally, USAID officials stated that focusing on prevalence as a key measure of success may not demonstrate an anti-trafficking project's achievements. For example, a project may focus on protecting survivors by providing support services when the number of trafficking victims has increased because of external factors, such as a humanitarian crisis or natural disaster. In this case, USAID officials told us that a focus on prevalence as the measure of success would not examine the project's protection-related achievements.

results to determine the extent to which projects achieved their objectives.

- **Inconsistent terminology.** State's TIP Office officials told us that differences in definitions of human trafficking and related terms, such as forced labor, between national governments and international standards make it difficult to compare data and results across evaluations.
- **Ethical considerations.** USAID and DOL officials said that there are ethical considerations to evaluating anti-trafficking projects. For example, since many evaluations interview project beneficiaries, evaluators must take care not to re-traumatize trafficking survivors.¹²

Agency officials described several internal challenges related to project design that make it difficult to evaluate the effectiveness of international anti-trafficking projects, including:

- **Focus on outputs over outcomes.** State's TIP Office officials said that many anti-trafficking projects tend to focus on outputs (e.g., number of people trained or materials produced) over outcomes (e.g., whether people trained are applying skills learned from training).¹³ While output indicators help track progress on project activities, these data are less useful for tracking progress toward achieving project goals and objectives. Further, some projects lack monitoring mechanisms to collect data required to determine project outcomes.
- **Evaluation timing.** State's TIP Office and USAID officials stated that evaluations are often conducted within the project's life cycle, which

¹²State's TIP Office and DOL officials stated that there are additional ethical considerations for impact evaluations, since many use randomized control experiments to determine the project's unique impacts. Such experiments involve comparing the change in outcomes for a randomly assigned treatment (or intervention) group and nonparticipating control groups. See GAO, *Designing Evaluations 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: Jan. 31, 2012). These officials told us that there are many ethical questions related to separating people into a control group, which does not receive project support.

¹³DOL officials told us that projects should establish achievable and measureable outcomes, although they may find outputs are easier to achieve, monitor, and show progress toward achieving. According to the OECD/DAC, outcomes are the likely or achieved short-term and medium-term effects of an intervention's outputs. Outputs are the products, capital goods, and services that result from a development intervention and may also include changes relevant to the achievement of outcomes. See OECD/DAC (2002).

reduces the time available for assessing longer-term results, such as behavioral change.

- **Limited resources.** Agency officials said that because of limited data, evaluators and implementing partners may need to collect primary data, which requires significant time, resources, and expertise. In addition, USAID officials stated that overseas missions do not have sufficient resources to support evaluations, given that staff manage multiple projects.

While conducting a literature search and screening, we found several publications that described similar challenges to evaluating international anti-trafficking projects. In particular, publications noted challenges related to limited human trafficking data. For example, one of the publications found that data collection for evaluations of anti-trafficking projects had been insufficient, based on its review of 49 evaluations conducted through 2015.¹⁴

Many of these challenges are longstanding. We previously reported similar challenges to conducting impact evaluations of anti-trafficking projects.¹⁵ For example, we reported that developing baseline estimates for such projects is difficult because of the lack of commonly agreed-upon criteria for identifying trafficking survivors, among other things. In addition, the Senior Policy Operating Group Grantmaking Committee reported in 2012 that determining the effectiveness of such programs is challenging.¹⁶ For example, the report noted that many implementing partners and donors are not in a position to divert limited resources away from direct services for trafficking survivors in order to conduct formal evaluations.

¹⁴See Davy, “Anti-Human Trafficking Interventions: How Do We Know if They Are Working?” p. 486-504.

¹⁵[GAO-07-1034](#).

¹⁶Senior Policy Operating Group Grantmaking Committee, *Promising Practices: A Review of U.S. Government-funded Anti-trafficking in Persons Programs* (December 2012). The Trafficking Victims Protection Act, as amended in 2003, established the Senior Policy Operating Group, which consists of senior officials designated as representatives from State, USAID, DOL, DOD, and Treasury, among other agencies, and is responsible for coordinating interagency efforts to combat human trafficking (22 U.S.C. § 7103(g)).

Agencies Are Taking Steps to Address Some of These Challenges, Particularly Those Related to Data, Resources, and Project Design

State's TIP Office, USAID, and DOL are taking steps to address some of the challenges to evaluating international anti-trafficking projects, particularly those related to human trafficking data, evaluation resources, and project design.

Human trafficking data. Agencies are taking steps to improve data about human trafficking and the effectiveness of their anti-trafficking projects. State's TIP Office officials said that they funded five baseline assessments for projects active from fiscal years 2016 through 2018. The officials stated that the office is funding these baseline evaluations so that it may conduct more rigorous evaluations in the future. For example, a State's TIP Office official told us that the baseline assessments for its Child Protection Compacts identified country needs and subsequently informed project activities, project indicators, and data collection.¹⁷ As such, the baseline assessments help provide information that will benefit the final evaluations.

Further, State's TIP Office officials told us that PEMS aims to provide information about the effectiveness of anti-trafficking efforts through its focus on research, monitoring, and evaluation.¹⁸ For example, the University of Georgia plans to test and develop methodologies for measuring the prevalence of human trafficking through its Prevalence Reduction Innovation Forum established under its second PEMS award.¹⁹ This effort aims to improve prevalence measurements, and as such, State's TIP Office officials said it will help generate data about prevalence

¹⁷State's TIP Office officials told us that they funded baseline assessments for the office's Child Protection Compacts in Ghana, Peru, the Philippines, and Jamaica.

¹⁸The program's authorizing legislation—the National Defense Authorization Act for fiscal year 2017—specified rigorous monitoring and evaluation (22 U.S.C. § 7114(c)). Additionally, PEMS prime award recipients had issued nine subawards for human trafficking research, as of September 30, 2019.

¹⁹As of August 2020, State's TIP Office officials told us that the University of Georgia had issued seven subawards through the Prevalence Reduction Innovation Forum. According to the University of Georgia, the subawards focus on measuring the prevalence of human trafficking in various industries and countries, such as child sex trafficking in Brazil and forced labor in brick kilns in Pakistan.

reduction efforts—an outcome of interest for stakeholders.²⁰ State’s TIP Office officials told us that PEMS has elevated the importance of evidence-based programming to address human trafficking through its focus on prevalence reduction.

Additionally, USAID conducted human trafficking-related research in support of its DRG Center learning agenda.²¹ For example, USAID funded a study in Honduras in 2018 to examine the prevalence of different forms of human trafficking, which helps inform project design. USAID also funded a knowledge, awareness, and victim identification survey in the Philippines in 2018 to generate systematic evidence on human trafficking and its survivors.

Further, DOL officials told us that their projects include efforts to improve data about human trafficking. For example, a project is developing a training course on conducting research related to forced labor in crisis settings, which aims to improve the quality of research on human trafficking, according to DOL officials. These officials said that another project is developing tools to improve data collection about human trafficking, such as a methodology for measuring child labor, forced labor, and human trafficking in global supply chains.

Evaluation resources. Agencies are also taking steps to allocate additional resources for evaluations of anti-trafficking projects. State’s TIP Office officials told us they had increased funding for evaluations; specifically, from 2017 through 2019, State’s TIP Office annually spent \$800,000 to \$1.5 million for evaluations of projects, compared to

²⁰State’s TIP Office officials stated that they hope to collaborate with the National Institute of Justice (within the Department of Justice) and Department of Health and Human Services on this effort because they have conducted research on the prevalence of human trafficking in the United States. We previously reported that federal agencies had begun efforts to assess the prevalence of human trafficking in the United States and develop data standards and definitions to help facilitate prevalence studies. See GAO, *Human Trafficking: Agencies Have Taken Steps to Assess Prevalence, Address Victim Issues, and Avoid Grant Duplication*, [GAO-16-555](#) (Washington, D.C: June 28, 2016).

²¹The USAID DRG Learning Agenda, developed in 2016 and updated in 2017, is a set of research questions that help guide DRG programming by organizing and disseminating existing data, generating new evidence, and producing conclusions and recommendations through academic research, program evaluations, and multi-method tests of theories of change.

\$300,000 in 2016.²² In addition, State's TIP Office officials said they are funding evaluations for projects that have been completed (known as ex-post evaluations) to assess longer-term project outcomes.²³ For example, State's TIP Office funded an evaluation of criminal justice trainings in five countries that included an ex-post component and, as such, interviewed participants who had completed trainings to assess the sustainability of training results. Further, USAID and DOL have funded impact evaluations, which are particularly resource-intensive. USAID funded a completed impact evaluation of its anti-trafficking in persons project in Cambodia, examining two livelihood-enhancing interventions. DOL funded two completed impact evaluations related to human trafficking, examining projects that implemented awareness-raising campaigns and police training.²⁴

Anti-trafficking project design. Agencies are working to improve elements of anti-trafficking project design. State's TIP Office officials said they had helped ensure that PEMS subawards included both outcome and output indicators, to enable them to track projects' progress toward achieving their objectives and completing their activities. Additionally, State's TIP Office officials told us that the office is working to incorporate more outcome indicators for its projects through its new program design standards. Further, USAID officials stated that they are working with State's TIP Office to develop standard indicators to measure the effectiveness of anti-trafficking projects. USAID officials also told us that they had developed two new agency-specific indicators—the number of first responders trained in victim identification and the number of survivors referred for protection service—for anti-trafficking projects. Additionally, DOL officials told us that they address the ethical considerations to evaluating anti-trafficking projects by requiring evaluators to follow ethical protocols for interviewing trafficking survivors, and selecting evaluators with experience in working with survivor populations, among other things.

²²Further, State's TIP Office officials told us that this amount does not include the \$2.25 million in funding for the evaluation of GFEMS's first PEMS award.

²³Ex-post evaluations are evaluations of an intervention after it has been completed to assess the sustainability of results, among other things; such evaluations may be conducted directly after or long after completion. See OECD/DAC (2002). State's TIP Office officials told us that such evaluations can be challenging because it is difficult to identify and interview project beneficiaries after a project has been completed.

²⁴DOL officials told us that a third impact evaluation related to human trafficking was ongoing, as of August 2020. We did not review these impact evaluations because they did not examine U.S. government-funded projects.

Finally, State's TIP Office has implemented all four recommendations we made to improve the quality of its anti-trafficking project monitoring activities, which will better position it to assess project achievements.²⁵

Agencies Completed Eight Final Evaluations of International Anti-trafficking Projects Active from Fiscal Years 2016 through 2018 That Examine Project Effectiveness

As of March 31, 2020, State, USAID, and DOL had completed eight final evaluations of U.S. international anti-trafficking projects that were active from fiscal years 2016 through 2018 that examine the extent to which these projects achieved their objectives (effectiveness).²⁶ These final evaluations, which we found were of sufficient quality to report their findings, describe a range of project achievements related to awareness-raising, institutional capacity-building, and collaboration, as well as challenges related to external factors, stakeholder engagement, and limited resources, among other things. The final evaluations examined a variety of projects that focused on prosecution, protection, prevention, and partnership related to human trafficking in various countries. See table 5 for more details on projects that had final evaluations.

²⁵[GAO-19-77](#).

²⁶According to the OECD/DAC, effectiveness focuses on a project's attributable achievements and results, in contrast to impact, which reviews a project's contribution to higher-order effects. See OECD/DAC (2019). Projects active from fiscal years 2016 through 2018 may be ongoing and, therefore, their final evaluations may not have been completed. State's TIP Office officials stated that there are four additional final evaluations planned for awards active from fiscal years 2016 through 2018. USAID completed an additional final evaluation in April 2020 for an award active from fiscal years 2016 through 2018. DOL completed an additional final evaluation in June 2020, and officials stated that there are at least 11 additional final evaluations planned for awards issued in fiscal years 2017 and 2018. Additionally, DOL officials told us that the majority of its projects focus on child labor, so it administers fewer projects focused on human trafficking, and, consequently, evaluations of such projects.

Appendix I: Objectives, Scope, and Methodology

Table 5: U.S. International Anti-trafficking Projects Active during Fiscal Years 2016–2018 That Had Final Evaluations

Agency	Project focus	Project title	Country
State TIP Office	Protection	Trafficking in Persons – Recovery Center	Sierra Leone
State TIP Office	Prosecution	Criminal Justice Training Program	Burkina Faso, Tanzania, Botswana, Guinea, and Gabon
State DRL	Protection, Prevention	Aar Sunu Khaleyí (Protect Our Children)	Senegal
State DRL	Protection	Access to Justice for Marginalized Populations, Victims of Hereditary Slavery, Repatriated Refugees, and Other Vulnerable Groups	Mauritania
USAID	Prosecution, Protection, Prevention, Partnership	Combating Trafficking in Persons	Nepal
USAID	Prosecution, Protection, Prevention	Reduce Abuses against <i>Talibés</i> in Dakar	Senegal
DOL	Protection, Prevention, Partnership	Consolidating and Disseminating Efforts to Combat Forced Labor	Brazil and Peru
DOL	Prosecution, Protection, Prevention, Partnership	Paraguay Okakuaa (Progresses)	Paraguay

Legend: State TIP Office = Department of State's Office to Monitor and Combat Trafficking in Persons; State DRL = Department of State's Bureau of Democracy, Human Rights, and Labor; USAID = U.S. Agency for International Development; DOL = Department of Labor

Source: GAO analysis of documentation provided by State, USAID, and DOL. | GAO 21-53

Evaluations Identified International Anti-trafficking Project Achievements

While evaluating international anti-trafficking projects is challenging, as previously discussed, we found that the eight final evaluations we reviewed were of sufficient quality that we could report their findings related to project effectiveness.²⁷ These final evaluations examined the

²⁷We rated evaluations according to whether they met minimally acceptable standards for the following criteria: (1) study questions' alignment with stated goals of the project; (2) indicators/measures; (3) evaluation design; (4) target population and sampling; (5) data collection; (6) data analysis; (7) conclusions; (8) recommendations, if applicable; and (9) lessons learned, if applicable. We did not report evaluation findings that did not sufficiently meet these standards.

effectiveness of specific international anti-trafficking projects, identifying the following project achievements:²⁸

- **Improved awareness and knowledge.** All eight of the final evaluations found that the projects had successfully changed awareness, knowledge, or beliefs regarding human trafficking, and had developed new skills among target groups. For example, all of the participants who attended criminal justice trainings reported changes working with trafficking survivors; some reported understanding survivors' needs, while others reported referring survivors to support services. Similarly, another project addressing forced labor in Brazil and Peru improved the level of knowledge around forced labor in these countries, increasing the availability and quality of information related to forced labor.²⁹
- **Collaboration.** Seven of the eight final evaluations found that the projects had established productive relationships that played a part in obtaining achievements. For example, one project focused on protecting trafficking survivors in Sierra Leone had developed collaborative relationships with a wide range of partner organizations, which improved its ability to provide comprehensive protection services to trafficking survivors.
- **Strengthened institutional capacity.** Seven of the eight final evaluations found that the projects had strengthened the institutional capacity of targeted institutions. For example, one project helped strengthen an inspection system for compliance with child labor laws in the target region. According to the evaluation, the project developed a child labor monitoring mechanism for local institutions and successfully trained labor inspectors in procedures for child labor inspection.
- **Contributions to the legal framework.** Six of the eight final evaluations found that the projects had contributed to the legal frameworks related to human trafficking for targeted areas. For example, one project contributed to the adoption of local laws

²⁸Project achievements include both project outputs and outcomes. One of the final evaluations did not review the extent to which criminal justice trainings achieved their objectives directly, but instead identified training practices that contribute to the effectiveness, efficiency, and sustainable use of knowledge gained through training for participants.

²⁹For example, the evaluators found that the project's survey measuring forced labor provided detailed information about forced labor in the target region that can help inform policies addressing this topic.

regulating forced child begging in two municipalities. Another project worked successfully with stakeholders to revise national legislation to include forced labor in the criminal code.

Moreover, six of the eight final evaluations found that the projects were able to achieve some, but not all, aspects of their objectives.³⁰ For example, while one project helped households gain skills to access employment, it was limited in strengthening entrepreneurs, which required additional support. As such, the evaluation found that the project did not achieve all aspects of its objective to improve households' access to livelihoods. Another project developed the professional capacity of staff to support trafficking survivors in areas such as providing trauma-informed care, but staff required additional development in managing clients' aggression and maintaining complete clinical documentation, among other skills. As such, the evaluation found that the project did not achieve all aspects of its objective to develop the professional capacity of staff at a shelter for trafficking survivors.

Evaluations Also Identified International Anti-trafficking Project Challenges

The eight final evaluations we reviewed also identified challenges the international anti-trafficking projects faced in achieving their specific objectives, including the following:

- **External factors.** Seven of the eight final evaluations found that the projects had faced challenges related to external factors, such as political instability, natural disasters, and economic crises, which impeded progress toward achieving project objectives. For example, one project could not complete efforts to establish cooperation between government entities to institutionalize referrals of rescued workers from forced labor situations for social protection services because of unexpected political changes. Another project could not implement its activities related to reintegrating trafficking survivors for almost a year because of an Ebola epidemic.
- **Stakeholder engagement.** Six of the eight final evaluations found that the projects had faced challenges engaging certain stakeholders.

³⁰The eighth evaluation did not review the extent to which criminal justice trainings achieved their objectives directly, but instead identified training practices that contributed to the effectiveness, efficiency, and sustainable use of knowledge gained through training for participants.

For example, one project struggled to promote national dialogue among government, employer, and worker representatives about addressing forced labor because some employer organizations did not agree with the definition of slave labor in the country's legislation.

- **Limited resources.** Seven of the eight final evaluations found that the projects had faced challenges related to limited resources, such as funding, services, and products. For example, an evaluation found that an important challenge was financial sustainability for a trafficking recovery center supported by the project, partly because of the lack of government support and the high cost of providing quality comprehensive care.³¹

See appendix V for three examples of final evaluations' findings about the effectiveness of specific projects that aimed to (1) support survivors' recovery and reintegration in Sierra Leone, (2) reduce forced child begging in Senegal, and (3) reduce child labor in Paraguay.

Agencies' Evaluation Use Policies Met Our Leading Practices, and Agencies Generally Followed These Policies for Selected Midterm Evaluations to Strengthen Ongoing International Anti-trafficking Projects

In order to strengthen ongoing projects, agencies can use midterm evaluations to make course corrections in a project's implementation to improve its performance. For example, agencies and implementing partners can implement recommendations from midterm evaluations while a project is ongoing to better meet project objectives. According to agency officials, agencies completed 10 midterm evaluations for international anti-trafficking in persons projects that were active at any point from fiscal years 2016 through 2018. We selected midterm

³¹According to the evaluation, while it is currently unknown what level of aftercare services are needed to obtain successful reintegration outcomes for trafficking survivors, preliminary evidence indicates that comprehensive assistance helps trafficking survivors reintegrate into their communities.

evaluations for two projects per agency (a total of six) to determine the extent to which agencies followed their evaluation use policies.³²

Agencies' Evaluation Policies Met Our Leading Practices for Using Evaluation Results

We found that State, USAID, and DOL had established policies for using findings from evaluations that met our leading practices for evaluation use in foreign assistance, which can help agencies address impediments, effectively manage foreign assistance, and meet their goals.³³ Our leading practices for using foreign assistance evaluations are (1) establishing mechanisms for leadership and relevant internal and external stakeholders to use evaluation findings in management decisions or reforms, (2) establishing mechanisms to determine whether recommendations are accepted and if management or program actions are needed to address the recommendations, and (3) disseminating evaluation findings and methods to internal staff, policy makers, and the public.

State, USAID, and DOL policies for using evaluations generally aligned with these leading practices. The agencies are required to use evaluation findings in management decisions. For example, State is required to consider evaluation findings to make decisions about policies, strategies, priorities, and delivery of services, among other things. In addition, the agencies are required to establish mechanisms for following up on recommendations. For example, DOL documents recommendation acceptance and follow-up actions through its disposition of evaluation recommendation tracker. Additionally, it reviews implementing partners' technical progress reports, where implementing partners are required to

³²We identified agencies' policies for evaluation use that were in place when the midterm evaluations were completed. We selected a judgmental sample of midterm evaluations of projects, based on the following criteria: (1) whether the project was ongoing or recently completed, (2) whether the primary goal of the project was anti-trafficking, (3) the project funding amount, and (4) the location of the project.

³³For more information on GAO's leading practices for foreign assistance monitoring and evaluation, see [GAO-19-466](#).

report follow-up actions to evaluation report recommendations.³⁴ Further, agencies are required to disseminate their completed evaluations. For example, USAID is required to plan for dissemination and submit evaluation reports to the Development Experience Clearinghouse within 3 months of the evaluation’s completion to make them publicly available.³⁵ See appendix II for State’s, USAID’s, and DOL’s specific evaluation use policies and how they address GAO’s leading practices for foreign assistance evaluation use.

State’s TIP Office Recently Adopted Procedures to Follow All of State’s Policies for Using Midterm Evaluations to Strengthen Selected Anti-trafficking Projects

While we found that State’s TIP Office did not follow all of State’s department-wide policies for using evaluations for the two State TIP Office project midterm evaluations we reviewed, State’s TIP Office recently adopted procedures to ensure that future evaluations are used in accordance with State policies. See table 6 for more information on the extent to which State’s TIP Office followed evaluation use policies for the two midterm evaluations we reviewed.

Table 6: The Extent to Which the Department of State Followed Its Evaluation Use Policies for Two Anti-trafficking Project Midterm Evaluations

Evaluation use policies established in 18 FAM 301.4 ^a	Midterm Evaluation 1	Midterm Evaluation 2
Consider evaluation findings to make decisions about policies, strategies, priorities, and delivery of services, as well as planning and budget formulation processes.	Followed	Followed
Monitor progress on follow-up to evaluation recommendations through a document, such as a recommendation tracker.	Not followed	Not followed
Respond to evaluation recommendations with a written summary to leadership.	Followed	Followed
Develop evaluation dissemination plans that delineate stakeholders and ensure potential users of the evaluation have ready access to them.	Followed	Followed

Source: GAO analysis of Department of State documentation. | GAO-21-53

³⁴According to DOL’s *Management and Procedure Guidelines for Cooperative Agreements, Fiscal Year 2019*, technical progress reports are an official record of project progress and performance, including progress toward all indicators in the performance monitoring plan.

³⁵USAID’s Development Experience Clearinghouse is a publicly available online resource for USAID-funded technical and program documentation.

Note: We rated the extent to which the agency followed policies as “followed” if we received evidence that all critical elements of the policy were conducted and documented to a large or full extent, “partially followed” if we received evidence that some but not all critical elements of the policy were conducted and documented, and “not followed” if we did not receive evidence that any of the critical elements of the policy were conducted and documented.

^aThe Department of State’s *Foreign Affairs Manual (FAM)* and *Foreign Affairs Handbook (FAH)* establishes the agency’s structures, policies, and procedures.

We found that State’s TIP Office followed its guidance on considering evaluation findings to make decisions about policies, strategies, planning, and the budget formulation process. For example, in response to a midterm evaluation recommendation on a project in the sea fisheries sector, State’s TIP Office provided additional funding and a time extension to an implementing partner. For one of the midterm evaluations we reviewed, State did not provide documentation showing that TIP Office officials responded to evaluation recommendations with a written summary to leadership. However, TIP Office officials noted that summary materials produced by the external evaluator were provided to office leadership. For the two State TIP Office midterm evaluations we reviewed, State did not follow guidance to monitor progress on recommendations through a recommendation tracker. However, during the course of our review, State’s TIP Office adopted an evaluation recommendation tracker and required it for all evaluations completed since October 2019. State TIP Office officials said they plan to use the evaluation recommendation tracker to summarize recommendations and guide discussions with State TIP Office leadership on what, if any, actions to take, in response to the recommendations.

USAID Generally Followed Its Policies for Using Midterm Evaluations to Strengthen Selected Anti-trafficking Projects

For the two USAID project midterm evaluations we reviewed, USAID generally followed its policies for using evaluations to learn about and strengthen its efforts. See table 7 for more information on the extent to which USAID followed its evaluation use policies for the two midterm evaluations we reviewed.

Table 7: The Extent to Which the U.S. Agency for International Development (USAID) Followed Its Evaluation Use Policies for Two Anti-trafficking Project Midterm Evaluations

Evaluation use policies established in ADS 201.3.5^a	Midterm Evaluation 1	Midterm Evaluation 2
Review key evaluation findings, conclusions, and recommendations systematically.	Followed	Followed

Appendix I: Objectives, Scope, and Methodology

Evaluation use policies established in ADS 201.3.5^a	Midterm Evaluation 1	Midterm Evaluation 2
Develop a post-evaluation action plan, which documents (1) whether the mission or headquarter office accepts each recommendation, (2) the expected actions based on the evaluation responsibilities and time frames, and (3) completion of actions.	Followed	Followed
Plan for the dissemination and use of the planned evaluation.	Followed	Followed
Share final evaluation report with implementing partners.	Followed	Partially followed
Submit evaluation reports to the Development Experience Clearinghouse within 3 months of the evaluation's completion.	Followed	Followed

Source: GAO analysis of USAID documentation. | GAO-21-53

Note: We rated the extent to which the agency followed policies as “followed” if we received evidence that all critical elements of the policy were conducted and documented to a large or full extent, “partially followed” if we received evidence that some but not all critical elements of the policy were conducted and documented, and “not followed” if we did not receive evidence that any of the critical elements of the policy were conducted and documented.

^aUSAID’s *Automated Directives System* (ADS) establishes the agency’s organization, functions, policies, and procedures.

We found that for the two midterm evaluations we reviewed, USAID had followed agency evaluation use guidance, such as developing post-evaluation action plans in consultation with USAID management and implementing partners, assigning responsibilities, and determining time frames for responses to recommendations. For example, in response to a midterm evaluation recommendation that an implementing partner improve monitoring of job placement activities, USAID instructed the implementing partner to devise other indicators to better measure its progress in the development of a job placement platform.

For one midterm evaluation, we found that USAID had partially followed its policy to share the evaluation report with implementing partners. USAID did not provide documentation that it had directly shared the completed evaluation with the implementing partner. However, the evaluation was publicly available on its website, and USAID officials provided documentation showing that a draft of the evaluation report was shared with the implementing partner and told us that the final draft of the evaluation was also shared with implementing partners. In addition, USAID officials noted that they hosted a presentation of preliminary findings of the evaluation report.

DOL Generally Followed Its Policies for Using Midterm Evaluations to Strengthen Selected Anti-trafficking Projects

For the two DOL project midterm evaluations we reviewed, we found that DOL generally followed its guidance for using evaluations to learn about and strengthen its effort. See table 8 for more information on the extent to which DOL followed its evaluation use policies that were in place at the time of the two midterm evaluations. DOL's policies for evaluation use have changed recently, and a newer policy did not apply to one of the selected midterm evaluations.

Table 8: The Extent to Which the Department of Labor (DOL) Followed Its Evaluation Use Policies for Two Anti-trafficking Project Midterm Evaluations

Evaluation use policies established in multiple sources ^a	Midterm Evaluation 1	Midterm Evaluation 2
Within 3 months of completion of the midterm evaluation report, review and revise comprehensive monitoring and evaluation plan indicators and targets.	Partially followed	Not applicable ^b
Consult with the implementing partner regarding plans and timetables for follow-up actions that are to be taken in response to midterm evaluation recommendations.	Followed	Followed
Review progress of these recommendations in implementing partners' subsequent technical progress report.	Followed	Followed
Follow up on outcome and recommendations of the evaluation, as necessary.	Followed	Followed
Ensure the project addresses evaluation recommendations.	Followed	Followed

Source: GAO analysis of DOL documentation. | GAO-21-53.

Note: We rated the extent to which the agency followed policies as “followed” if we received evidence that all critical elements of the policy were conducted and documented to a large or full extent, “partially followed” if we received evidence that some but not all critical elements of the policy were conducted and documented, and “not followed” if we did not receive evidence that any of the critical elements of the policy were conducted and documented.

^aDOL’s evaluation use policies are primarily established in its *Management Procedures and Guidelines for Cooperative Agreements, Fiscal Year 2019* and *Staff Operations Manual*.

^bAccording to DOL officials, this policy did not apply to this evaluation, as the policy was not yet established in DOL’s *Management Procedures and Guidelines* at the start of the project.

For the two midterm evaluations we reviewed, DOL generally followed agency evaluation use guidance such as working with implementing partners to address evaluation recommendations. For example, the midterm evaluation on a DOL project called “From Protocol to Practice: A Bridge to Global Action on Forced Labor” recommended that the implementing partner should strengthen the management of the project at the headquarters level. In response, the implementing partner reallocated resources accordingly.

For one of the midterm evaluations, DOL partially followed its policy to review indicators and targets based on the midterm evaluation report. DOL completed its review of indicators and targets, but did so outside the established 3-month time frame. DOL officials told us the delay was caused by implementing partner staffing turnover and internal staffing challenges at DOL. Particularly, the implementing partner’s monitoring and evaluation position was vacant for several months.

Overall, State, USAID and DOL demonstrated that they generally followed their policies for using evaluations, for example, by reviewing findings and recommendations from selected midterm evaluation reports to strengthen ongoing projects, and by considering these

recommendations in management decisions and course corrections for projects. As mentioned earlier, State, USAID, and DOL policies for using findings from evaluations generally align with our leading practices for evaluation use in foreign assistance. Continuing to follow their policies for using evaluations could help the agencies better address impediments, manage foreign assistance, and meet their programmatic goals.

Agency Comments

We provided a draft of this report to State, USAID, DOL, DOD, and the Treasury for review and comments. All of the agencies provided technical comments, which we incorporated as appropriate. We received written comments from USAID that are reprinted in appendix VI. In USAID's written response, the mission in the Republic of Senegal noted that our description of the evaluation of the "Reduce Abuses against *Talibés* in Dakar" project's first phase did not take into account a recent assessment that reports on the second phase of the project. The assessment was outside the scope of our review, and therefore was not included in our discussion. However, we include a reference to the more recent assessment in appendix V, and we note that the assessment discusses the progress made during the project's second phase. State, DOL, DOD and Treasury informed us they had no written comments.

We are sending copies of this report to the appropriate congressional committees; the Secretaries of State, Labor, Defense, and the Treasury; and the Administrator of USAID. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at (202) 512-2964, or gurkinc@gao.gov. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VII.



Chelsea Kenney Gurkin
Director, International Affairs and Trade

List of Committees

The Honorable James M. Inhofe
Chairman

The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable James Risch
Chairman
The Honorable Robert Menendez
Ranking Member
Committee on Foreign Relations
United States Senate

The Honorable Richard C. Shelby
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The Honorable Dick Durbin
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Subcommittee on Defense
Committee on Appropriations
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The Honorable John Kennedy
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The Honorable Christopher Coons
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Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

The Honorable Roy Blunt
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Subcommittee on Labor, Health and Human Services, Education, and
Related Agencies
Committee on Appropriations
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The Honorable Patrick Leahy
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Subcommittee on State, Foreign Operations, and Related Programs
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The Honorable Adam Smith
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The Honorable Eliot Engel
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House of Representatives

The Honorable Mike Quigley
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The Honorable Steve Womack
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
House of Representatives

The Honorable Rosa DeLauro
Chairwoman
The Honorable Tom Cole
Ranking Member
Subcommittee on Labor, Health and Human Services, Education, and
Related Agencies

**Appendix I: Objectives, Scope, and
Methodology**

Committee on Appropriations
House of Representatives

The Honorable Nita Lowey
Chairwoman

The Honorable Hal Rogers
Ranking Member

Subcommittee on State, Foreign Operations, and Related Programs
Committee on Appropriations
House of Representatives

Appendix I: Objectives, Scope, and Methodology

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on the programs conducted by the Department of State (State), the U.S. Agency for International Development (USAID), the Department of Labor (DOL), the Department of Defense (DOD), and the Department of the Treasury (Treasury) that address human trafficking and modern slavery, including a detailed analysis of the effectiveness of such programs in limiting human trafficking and modern slavery.¹ Three of these agencies—State, USAID, and DOL—have programs that design and award anti-trafficking projects to implementing partners, through contracts, grants, or cooperative agreements.² These agencies also oversee and monitor these projects. Since DOD and Treasury officials did not identify these types of projects as part of their anti-trafficking in persons efforts, we provided background information on their efforts but did not cover these agencies in our reporting objectives.

This report (1) describes recent international anti-trafficking in persons projects that key U.S. agencies have awarded to implementing partners; (2) describes the funding and awards for State’s international anti-trafficking program, the Program to End Modern Slavery (PEMS), and the extent to which State conducted oversight for subaward selection under the PEMS program;³ (3) describes agencies’ U.S. international anti-trafficking project evaluation efforts, including actions agencies are taking

¹See Pub. L. No. 114-328, Div. A, Title XII, § 1298(h), 130 Stat. 2000, 2563 (2016), codified at 22 U.S.C. § 7114(h).

²For the purposes of our reporting objectives, implementing partners include contractors, grantees, and recipients of cooperative agreements.

³The Code of Federal Regulations defines subaward as “an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract (2 C.F.R § 200.92). In our report, we therefore use the term “subaward” to refer to grants or contracts made under a prime award by an implementing partner.

to address challenges to such evaluations; and (4) examines the extent to which agencies' policies addressed GAO leading practices for using evaluations to strengthen projects, and the extent to which agencies followed these policies for midterm evaluations.

To describe key U.S. agencies' recent international anti-trafficking projects awarded to implementing partners, we asked knowledgeable officials at State, DOL, and USAID to identify those of their projects that (1) had an international focus; (2) were delivered by implementing partners to external recipients, such as trafficking victims or host governments, as project beneficiaries; and (3) addressed trafficking in persons, modern slavery, or forced labor.⁴ Because State, USAID, and DOL manage such projects, we focus on them as the three key agencies for the purposes of our reporting objectives. According to officials from these three agencies, the projects they identified range from those with anti-trafficking in persons as a primary goal, to those in which this goal was integrated as part of a broader project focus.⁵ We conducted fieldwork in the Philippines, which we selected because we were able to observe State, USAID, and DOL projects, including projects under State's PEMS.

We asked agencies to identify projects that were active during fiscal year 2018 and the first half of fiscal year 2019, defined as those projects that began, were ongoing, or ended at any point during fiscal year 2018 and the first half of 2019. State identified projects that were focused on anti-trafficking as a primary goal, and USAID and DOL identified such projects along with projects that included anti-trafficking as part of a broader effort. For projects in which anti-trafficking was integrated into other activities, both USAID and DOL were able to determine the portion of funding that was specifically for anti-trafficking activities, except in the case of two

⁴According to State, "trafficking in persons," "human trafficking," and "modern slavery" are used as umbrella terms to refer to both sex trafficking and compelled labor. Agency officials we met with also commented that modern slavery is not defined in law and often used interchangeably with the term "trafficking in persons" or "human trafficking."

⁵To address the mandate, we gathered information about agencies' programs and projects. In prior GAO reports, we noted that the *Glossary of Terms Used in the Federal Budget Process* defines "program" as "generally, an organized set of activities toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities." This definition acknowledges that because the term program has many uses in practice, it does not have a standard meaning in federal law. It is used to describe an agency's mission, functions, activities, services, projects, and processes. Our report uses the term "projects" to refer to anti-trafficking in persons interventions funded by key agencies through awards made to implementing partners, though some agencies may sometimes refer to such interventions as "programs."

DOL projects. State's TIP office told us that two projects are Sensitive But Unclassified (SBU) in order to protect the safety and confidentiality of the implementing partners. We included the awards when reporting summary information on State projects in terms of total number of awards, project type, and the funding amount. We excluded the awards from the detailed listing we report in appendix III. For two DOL projects totaling \$3.8 million that addressed efforts to combat child labor and human trafficking, DOL could not isolate the specific funding amount designated for anti-trafficking activities. Therefore, we did not include the \$3.8 million in the total funding reported for DOL projects. As a result, the total amount of DOL anti-trafficking funding we report may be up to \$3.8 million greater than the award amount we report for DOL.

We used the lists of projects that these agencies provided to report the number of, and funding for, relevant anti-trafficking projects that agencies awarded to implementing partners to carry out the projects. We verified how agencies identified and extracted data from their systems on projects and asked agency officials to verify the data and identify any missing or incorrect values, as follows:

- **State.** State officials noted that they pulled project data from the State Assistance Management System-Domestic and compared the data with State TIP Office records. Two State TIP Office officials then verified the data for accuracy and completeness.
- **USAID.** The USAID DRG office maintains an anti-trafficking project database, and USAID personnel at overseas missions and regional bureaus enter project data directly into the database. USAID officials noted that personnel at overseas missions ensure the accuracy and completeness of data entered into the database. The officials also noted that personnel at overseas missions, regional bureaus, and the DRG office are responsible for quality control.
- **DOL.** DOL officials noted that they pulled project information from DOL's E-Grants System, which captures processes that occur throughout the grants lifecycle. DOL is also required to submit an annual listing of projects with an anti-trafficking focus to the U.S. Attorney General. DOL officials verified that the projects included in the report to the U.S. Attorney General were also active during the period of our review.

We found State, USAID, and DOL project data to be sufficiently reliable for reporting on project details, including name, location, start and end dates, and funding amounts.

To describe funding and awards for State's PEMS, we reviewed relevant agency documents and interviewed knowledgeable agency officials, as well as PEMS prime award recipients—the Global Fund to End Modern Slavery (GFEMS), the University of Georgia Research Foundation (University of Georgia), and the Freedom Fund—and subawardees.⁶ To report on PEMS subawards, we asked State's implementing office, the Office to Monitor and Combat Trafficking in Persons (TIP Office), to identify all subawards—grants and contracts administered by the prime award recipient—issued under PEMS, as of September 30, 2019 (the end of fiscal year 2019). We used the list of subawards State's TIP Office provided to report the 34 subawards issued by PEMS prime award recipients related to anti-trafficking in persons projects, human trafficking research, and operational support.⁷ To determine the reliability of these data, we followed the steps discussed earlier for project data. For example, we asked State's TIP Office to verify the funding and awards data, and to identify any missing or incorrect information. We found State's data to be sufficiently reliable for reporting award details and funding amounts.

To assess the extent to which State conducted oversight for subaward selection under PEMS, we reviewed State's cooperative agreements with PEMS prime award recipients to identify State's TIP Office's responsibilities for sub-award selection. Additionally, we identified and reviewed the 15 subawards issued by PEMS prime award recipients in fiscal years 2018 and 2019 for which subaward selection oversight responsibilities for State's TIP Office were outlined in the PEMS

⁶Relevant agency documents include PEMS funding opportunity announcements, cooperative agreements, and project information.

⁷We identified 13 subawards for anti-trafficking projects, nine subawards for human trafficking research, and 12 subawards for operational support on the basis of the subaward descriptions and agreements provided by State's TIP Office. Additionally, we determined the total funding amount of \$16.43 million for these subawards, on the basis of the award amounts for each subaward provided by State's TIP Office. This subaward count and funding amount includes a subaward that was cancelled because the subawardee did not fully adhere to the subaward's terms and conditions, according to State's TIP Office. For the total funding amount, we included the almost \$90,000 in funding disbursed (of the approximately \$630,000 award amount) for the cancelled subaward.

cooperative agreements under which the subawards were made.⁸ To determine the extent to which State's TIP Office had met its oversight responsibilities for subaward selection in fiscal years 2018 and 2019, we reviewed relevant oversight documentation provided by State's TIP Office. This included documentation related to the 12 subgrants issued by GFEMS under its PEMS 1 award and three subawards (two subgrants and one contract) issued by the University of Georgia under its PEMS 2 award.⁹ We made our determination of the extent to which State's TIP Office had conducted oversight for subaward selection, as follows:

- We determined that State's TIP Office had fully met its oversight responsibilities for subaward selection if the office provided documentation showing that all critical elements of the responsibility were conducted to a large or full extent.
- We determined that State's TIP Office had partially met its oversight responsibilities for subaward selection if the office provided documentation showing that some, but not all, critical elements of the responsibility were conducted.
- We determined that State's TIP Office had not met its oversight responsibilities for subaward selection, if the office did not provide documentation showing that any of the critical elements of the responsibility were conducted.

⁸This group of subawards does not reflect all 34 subawards that prime award recipients issued in fiscal years 2018 and 2019 because we reviewed the subawards that State's TIP Office was responsible for overseeing according to the PEMS cooperative agreements under which the subawards were made. As such, we reviewed the 12 subgrants (for projects) issued by GFEMS under its PEMS 1 award and two subgrants (for research and operational support, respectively) issued by the University of Georgia under its PEMS 2 award because State's TIP Office was responsible for reviewing and approving sub-grant recipients under the PEMS 1 and PEMS 2 cooperative agreements. We also reviewed the one contract for a prevalence study issued by the University of Georgia under its PEMS 2 award because State's TIP Office was responsible for reviewing and approving contracts for prevalence studies under the PEMS 2 cooperative agreement. For the other 19 subawards issued during our period of review, State's TIP Office did not have oversight responsibilities for subaward selection according to the terms of the relevant cooperative agreements.

⁹As of September 30, 2019, GFEMS had not issued any subawards for which there were subaward selection oversight responsibilities for State's TIP Office under its PEMS 2 award. Additionally, the University of Georgia and Freedom Fund's PEMS 3 awards began outside our period of review of awards made in fiscal years 2018 and 2019.

Additionally, we interviewed knowledgeable agency officials and prime award recipients to understand how State's TIP Office interpreted and addressed its responsibilities for PEMS subaward selection.

To describe agencies' evaluation efforts for U.S. international anti-trafficking projects, we conducted a literature search and screening on the effectiveness of such projects, reviewed final evaluations of State, USAID, and DOL international anti-trafficking in persons projects, and discussed with relevant agency officials the challenges related to conducting such evaluations and their efforts to address these challenges.

To conduct the literature search, a GAO research librarian searched various research databases and platforms—including ProQuest, HeinOnline, and Harvard Think Tank Search Engine, among others—to identify scholarly and peer-reviewed publications, conference papers, dissertations, books, government reports, trade articles, legislative materials, and publications by nonprofits and think tanks, published from January 2016 through September 2019, that addressed the effectiveness of U.S. international anti-trafficking in persons efforts (including evaluations of such efforts). We excluded working papers and news articles from the literature search. Our search terms included “human trafficking,” “evaluations,” “effectiveness,” and related terms, such as “assessment,” “intervention,” and “trafficking in persons.” In October 2019, we conducted multiple iterations of title, abstract, and keyword searches that produced 161 publications.¹⁰

To identify relevant publications for our review, we applied a two-stage process. First, one reviewer assessed the title and abstract of each publication to determine whether it appeared to meet either of the following criteria:

1. The publication focused on the effectiveness of U.S. government-funded projects, interventions, efforts, or responses that combat international human trafficking or modern slavery.
2. The publication was an evaluation of a U.S. government-funded project, intervention, or response to combat international human

¹⁰The original search results identified a book. We assessed each of the book's chapters for inclusion in our review, since the chapters were written by different authors and focused on different topics related to human trafficking. This count includes the chapters as distinct sources.

trafficking or modern slavery or was a review of such studies.

A second reviewer then reviewed the publication's title and abstract, as well as the first reviewer's assessments, and identified any differences in determination on whether the article could be relevant for our review. Any differences in the reviewers' determinations on whether the article might be relevant for our review were discussed and reconciled. In this first stage, we determined that 146 of the 161 publications were not relevant and should not be included in our review.

Second, two reviewers assessed the full text for each of the 15 remaining publications to confirm whether they met the criteria noted above. The reviewers followed the same sequential process, including reconciling any differences in determination on whether the article should be included in our review. At this stage, we determined that none of the publications met our criteria to be included in our review. Therefore, we reviewed none of the publications for content related to the effectiveness of U.S. international anti-trafficking projects.

Further, to describe agencies' efforts to evaluate the effectiveness of U.S. international anti-trafficking in persons projects, we reviewed final evaluations of such projects that were (1) funded by State, USAID, or DOL, and (2) active at any point from fiscal years 2016 through 2018. These agencies provided eight final evaluations of such projects that were completed by March 31, 2020. To ensure that the evaluations met minimal quality standards and were of sufficient quality for us to report on their results, a reviewer assessed each evaluation against various quality criteria and determined whether it met minimal quality standards overall.¹¹ Additionally, the reviewer identified any limitations. A second reviewer then examined the first reviewer's assessments, identifying any differences in their assessments of each evaluation's quality and limitations. Any differences in the reviewers' determinations were

¹¹Reviewers rated evaluations according to whether they met minimal acceptable standards for the following criteria: (1) study questions' alignment with stated goals of the intervention/project, (2) indicators/measures, (3) evaluation design, (4) target population and sampling, (5) data collection, (6) data analysis, (7) conclusions, (8) recommendations, if applicable, and (9) lessons learned, if applicable. Additionally, the reviewers came to an overall assessment of whether the evaluation met minimal quality standards. We did not report on evaluation findings that the reviewers found were not sufficiently supported by the evaluation methodology or evidence.

discussed and reconciled. We found that all eight final evaluations met minimal quality standards, though some also had limitations.

To describe the evaluations' findings of project effectiveness, we identified the achievements and challenges that the evaluations found related to each project's goals, objectives, and outcomes.¹² To identify common achievements and challenges across the eight evaluations, one reviewer classified the evaluations' findings for project achievements and challenges according to various categories.¹³ A second reviewer then assessed the first reviewer's classifications, identifying any differences in how project achievements or challenges were categorized. Any differences in the reviewers' determinations were discussed and reconciled.

Finally, we identified a number of (1) external challenges related to human trafficking, as well as (2) internal challenges related to project design for conducting evaluations of international anti-trafficking projects, based on our interviews with agency officials and literature search and screening. We interviewed agency officials about these challenges to confirm, better understand, alter, or add to them. We also interviewed agency officials and reviewed relevant documentation to identify steps that agencies are taking to address such challenges.

To assess the extent to which agencies' policies for using evaluations to strengthen projects met GAO leading practices, we reviewed agency documentation to identify State, USAID and DOL policies for using evaluations. We then compared these policies with the following GAO leading practices to determine the extent to which they were aligned: (1) establishing mechanisms for leadership and relevant internal and external stakeholders to use evaluation findings in management decisions or reforms, (2) establishing mechanisms to determine whether recommendations are accepted and if management or program actions

¹²For the purposes of our review, effectiveness is the extent to which the project's objectives were achieved or are expected to be achieved. See OECD/DAC (2002). In 2019, OECD/DAC updated the definition to "the extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups." See OECD/DAC (2019).

¹³The categories included project achievements related to (1) changing awareness, knowledge, and beliefs of target groups, (2) strengthening the institutional capacity of target institutions, and (3) contributing to the legal framework. The categories also included challenges related to (1) coordination, (2) external factors, and (3) limited resources.

are needed to address the recommendations, and (3) disseminating evaluation findings and results to internal staff, policy makers, and the public.¹⁴

In addition, to determine the extent to which agencies had implemented their policies for using midterm evaluations to strengthen projects, we identified all midterm evaluations for anti-trafficking in persons projects completed by State, USAID, and DOL in fiscal years 2016 through 2018. We selected a nongeneralizable sample of two midterm evaluations per agency. We selected our sample based on characteristics including whether projects were ongoing or recently completed, and whether efforts to improve projects based on evaluation findings and recommendations would be expected.

For the selected midterm evaluations in our sample, we requested documentation and met with agency officials to determine whether and how agencies had implemented relevant policies on using evaluation findings and recommendations. Two GAO analysts reviewed agency documentation to determine the extent to which agencies followed, partially followed, or did not follow their policies. A second reviewer then examined the first reviewer's assessments, identifying any differences about their assessments. Any differences in the reviewers' determinations were discussed and reconciled. Coders marked "followed" when information provided demonstrated that agencies had addressed all or nearly all aspects of the specific requirement. Coders marked "followed" when information provided demonstrated that agencies had addressed nearly all aspects of the specific requirement. Coders marked "partially followed" when information provided demonstrated that agencies had addressed some (but not all, or nearly all) aspects of the specific requirement. Coders marked "did not follow" when there was no information demonstrating that agencies had addressed the specific requirement, or the documentation provided did not relate in any way to the specific requirement. Any differences in the reviewers' determinations on the extent to which agencies followed their policies were discussed and reconciled.

We conducted this performance audit from May 2019 to November 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our

¹⁴[GAO-19-466](#).

**Appendix I: Objectives, Scope, and
Methodology**

findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Department of State, U.S. Agency for International Development, and Department of Labor Evaluation Use Policies

The Department of State (State), the U.S. Agency for International Development (USAID), and the Department of Labor (DOL) have policies for evaluating their foreign assistance that enable them to learn about project effectiveness. In particular, agencies have requirements for the use of evaluations to better understand project results and guide future efforts and decision-making. These requirements address GAO's leading practices for (1) using evaluation findings in management decisions, (2) establishing mechanisms for following up on recommendations, and (3) disseminating evaluation findings/results.¹ See table 9 for each agency's specific evaluation use policies and their alignment with GAO leading practices.

¹For the complete list of leading practices, see [GAO-19-466](#). We previously reported that State's and USAID's evaluation policies addressed all 14 leading evaluation principles and incorporated OMB's *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance* (OMB Memorandum M-18-04). See [GAO-16-861R](#) and [GAO-19-466](#).

Appendix II: Department of State, U.S. Agency for International Development, and Department of Labor Evaluation Use Policies

Table 9: Alignment of Department of State (State), U.S. Agency for International Development (USAID), and Department of Labor (DOL) Policies for Evaluation Use with GAO Leading Practices for Evaluation Use

Leading practice ^a	State policies 18 FAM 301.4 ^b	USAID policies ADS 201.3.5 ^c	DOL/ILAB/OCFT policies Multiple sources ^d
Use evaluation findings in management decisions	<ul style="list-style-type: none"> Consider evaluation findings to make decisions about policies, strategies, priorities, and delivery of services, as well as planning and budget formulation processes. Respond to evaluation recommendations with a written summary to leadership, which enables management to discuss recommendations and create a plan for implementation, among other things. 	<ul style="list-style-type: none"> To help ensure institutional learning takes place and evaluation findings are used to improve development outcomes, review key evaluation findings, conclusions, and recommendations systematically and develop post-evaluation action plan. 	<ul style="list-style-type: none"> Apply learning from evaluation into new and ongoing projects, as appropriate. Document management decisions regarding evaluation recommendations and plans for implementation in the centralized disposition of evaluation recommendation tracker.
Establish mechanisms for following up on recommendations	<ul style="list-style-type: none"> Respond to evaluation recommendations with a written summary to leadership, which enables management to outline whether they concur with recommendations and designate a time frame for implementation, among other things. Monitor progress on follow-up to evaluation recommendations through a document, such as a recommendation tracker. 	<ul style="list-style-type: none"> Develop a post-evaluation action plan upon evaluation's completion, which documents (1) whether the mission or headquarter office accepts each recommendation, (2) the expected actions based on the evaluation responsibilities and time frames, and (3) completion of actions. 	<ul style="list-style-type: none"> Document decisions regarding evaluation recommendations and plans for implementation in the disposition of evaluation recommendation tracker. Consult with implementing partners about plans and timetables for follow-up actions to midterm evaluation recommendations. Review subsequent technical progress reports where implementing partners report on the progress of follow-up actions to midterm evaluation recommendations.

Appendix II: Department of State, U.S. Agency for International Development, and Department of Labor Evaluation Use Policies

Leading practice ^a	State policies 18 FAM 301.4 ^b	USAID policies ADS 201.3.5 ^c	DOL/ILAB/OCFT policies Multiple sources ^d
Disseminate evaluation findings/results	<ul style="list-style-type: none"> • Develop evaluation dissemination plans that delineate stakeholders and ensure potential users of the evaluation have ready access to them. • Maintain copies of final evaluation reports for appropriate dissemination. • Internally post completed evaluations (unless classified), so they are accessible to all State bureaus and offices. • Publicly post completed foreign assistance-funded evaluation reports within 90 days.^e 	<ul style="list-style-type: none"> • Plan for dissemination and use of the planned evaluation. • Share the draft and final evaluation reports with implementing partners. • Submit evaluation reports to the Development Experience Clearinghouse within 3 months of the evaluation's completion to make them publicly available. 	<ul style="list-style-type: none"> • Distribute completed evaluation reports internally. • Publish evaluation report on DOL/ILAB website.

Legend: DOL/ILAB/OCFT = Department of Labor's Bureau for International Labor Affairs' Office of Child Labor, Forced Labor, and Human Trafficking
Source: GAO analysis of State, USAID, and DOL policies and procedures. | GAO-21-53

Note: Agency policies may align with more than one leading practice.

^aFor the complete list of GAO's leading practices for evaluating foreign assistance, see GAO, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most, but Not All Leading Practices*, GAO-19-466 (Washington, D.C.: July 31, 2019).

^bState's *Foreign Affairs Manual* (FAM) establishes the agency's structures, policies, and procedures.

^cUSAID's *Automated Directives System* (ADS) establishes the agency's organization, functions, policies, and procedures.

^dDOL's evaluation use policies are established in its *ILAB/OCFT Management and Procedure Guidelines for Fiscal Year 2019*, *ILAB/OCFT Staff Operations Manual*, and *DOL/ILAB Implementation of Office of Management and Budget's Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance* (January 2019).

^eFor sensitive evaluations, State will publicly post a summary.

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

The Department of State (State), the U.S. Agency for International Development (USAID), and the Department of Labor (DOL) managed 182 projects in anti-trafficking in persons carried out by implementing partners during fiscal year 2018 and the first half of fiscal year 2019, according to information provided by officials with these agencies.¹ These projects were worth at least \$316 million in anti-trafficking-related award funding. The three agencies used different approaches to identify relevant projects. State identified projects that were focused on anti-trafficking as a primary goal, and USAID and DOL identified such projects along with projects that included anti-trafficking as part of a broader effort. Table 10 lists these agencies' reported project information.

Table 10: Department of State (State), U.S. Agency for International Development (USAID), and Department of Labor (DOL) Anti-trafficking in Persons Projects Active at Any Point during Fiscal Year 2018 and the First Half of Fiscal Year 2019, as Identified by Agency Officials

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Global Programme Against Trafficking in Persons To Enhance the Implementation of the United Nations Protocol	Global	9/27/2011	4/1/2018	1,410,000
State's TIP Office	Global Database for Human Trafficking Cases	Global	10/1/2013	3/30/2018	1,025,000
State's TIP Office	Counter-Trafficking Training and Technical Assistance	Global	10/1/2013	5/30/2018	1,000,000

¹State identified two projects that are Sensitive But Unclassified. Those projects are not listed in this table, but are included in the total number of projects discussed in objective 1 and this appendix.

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Strengthening National and Regional Capacity in the Criminal	Global	10/1/2013	6/30/2018	2,094,792
State's TIP Office	Trafficking in Persons Recovery Centre	Sierra Leone	10/1/2013	9/30/2018	1,200,000
State's TIP Office	Enhance Government and Civil Society Responses in Bhutan	Bhutan	10/1/2013	9/30/2018	750,000
State's TIP Office	South Kivu Anti-trafficking Partnership Program	Democratic Republic of the Congo	10/1/2014	11/30/2017	1,000,000
State's TIP Office	Strengthening Coordination to Respond to Trafficking in Persons	Mozambique	10/1/2014	12/31/2017	750,000
State's TIP Office	Building a National Non-Governmental Organization Network to Combat Trafficking	Myanmar	10/1/2014	12/31/2017	700,000
State's TIP Office	Integrated Services for Human Trafficking Victims in Peru	Peru	10/1/2014	12/31/2017	700,000
State's TIP Office	Best Practices in Global Data Collection on Trafficking in Persons	Global	10/1/2014	3/30/2018	500,000
State's TIP Office	Supporting the Enactment of Anti-trafficking Legislation	Tunisia	10/1/2014	2/28/2019	950,000
State's TIP Office	A Cloud-based Case Data Capture	Hong Kong, Special Administrative Region of the People's Republic of China	10/1/2014	7/31/2019	750,000
State's TIP Office	Reduce Trafficking in Northern and Central Vietnam	Vietnam	10/1/2014	9/30/2018	600,000
State's TIP Office	International Organization for Migration's Human Trafficking Information Exchange	Global	10/1/2014	3/31/2019	600,000
State's TIP Office	Strengthening the Criminal Justice Response to Trafficking in Persons	Somalia	10/1/2014	9/30/2018	750,000
State's TIP Office	Protect, Shelter and Heal: Victim-Centered Technical Assistance	Africa region	4/1/2015	12/31/2017	750,000
State's TIP Office	Strengthening Uruguay's Efforts to Effectively Combat Trafficking in Persons	Uruguay	4/1/2015	3/31/2018	470,000
State's TIP Office	Trafficking in Persons - Legal Assistance Program	Africa region	4/1/2015	6/30/2018	750,000
State's TIP Office	Growing up Free: An Effective Response to Child Trafficking	Ghana	9/30/2015	3/31/2021	3,475,000
State's TIP Office	Emergency Direct Assistance for Victims of Trafficking	Global	10/1/2015	6/30/2019	1,260,000

**Appendix III: Three Key U.S. Agencies' Anti-
trafficking in Persons Projects, Active in Fiscal
Years 2018–First Half of 2019**

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Assisting the Government of Ghana to Combat Child Trafficking	Ghana	10/1/2015	12/31/2020	2,915,000
State's TIP Office	USCCB/MRS Project to Combat Global Maritime Human Trafficking	East Asia and Pacific region	10/1/2015	12/31/2017	500,000
State's TIP Office	Strengthening Coordination to Respond to Trafficking in Persons	Namibia	10/1/2015	9/30/2018	750,000
State's TIP Office	Combating Human Trafficking in Bangladesh through the Promotion	Bangladesh	10/1/2015	9/30/2018	750,000
State's TIP Office	Combating Human Trafficking in India	India	10/1/2015	9/30/2018	750,000
State's TIP Office	Technical Assistance to the Government of Kyrgyzstan	Kyrgyzstan	10/1/2015	9/30/2018	750,000
State's TIP Office	Establishment of Data Collection Systems in SADC Member States	Africa region	10/1/2015	12/31/2017	400,000
State's TIP Office	Strengthening the Institutional Capacity of Criminal Justice	Western Hemisphere region	10/1/2015	9/30/2018	486,808
State's TIP Office	Strengthening the Capacity of the Mexican Government	Mexico	10/1/2015	2/28/2019	750,000
State's TIP Office	Burma Anti-trafficking in Persons Project	Myanmar	10/1/2015	1/31/2019	700,000
State's TIP Office	Protecting Victims of Trafficking through Enhanced Partnership	Timor-Leste	10/1/2015	9/30/2018	600,000
State's TIP Office	Improving the Capacity of Philippines Law Enforcement, Judicial	Philippines	10/1/2015	9/30/2018	500,000
State's TIP Office	Strengthening the National Action Plan in Turkmenistan	Turkmenistan	10/1/2015	9/30/2018	500,000
State's TIP Office	New Law on the Books: Women Judges Provide Leadership	Haiti	10/1/2015	1/30/2019	750,000
State's TIP Office	Strengthening the National Criminal Justice System's Response	Djibouti	10/1/2015	3/30/2018	500,000
State's TIP Office	Enhancing National Counter-Trafficking Efforts in Malaysia	Malaysia	1/1/2016	12/30/2017	400,000
State's TIP Office	A Shelter and Repatriation Services for Survivors of Human Trafficking	Laos	1/1/2016	12/30/2018	930,000
State's TIP Office	Bangladesh: Combating Labor Trafficking through Awareness Raising	Bangladesh	4/1/2016	3/31/2018	500,000
State's TIP Office	Providing Assistance to Victims of Human Trafficking	Thailand	4/1/2016	6/30/2019	600,000
State's TIP Office	Urban Light: Expanding Victim-Services for Males	Thailand	6/1/2016	5/30/2021	500,000
State's TIP Office	United Nations Office on Drugs and Crime Country Programme for Pakistan	Pakistan	9/1/2016	8/31/2019	750,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	INTERPOL Project to Combat Human Trafficking Rapid Training and Technical Assistance	Global	10/1/2016	12/30/2019	750,000
State's TIP Office	Strengthening Governmental Efforts to Combat Human Trafficking	Egypt	10/1/2016	9/30/2018	400,000
State's TIP Office	Establishment of a National Data Collection System in Tanzania	Tanzania	10/1/2016	9/30/2018	150,000
State's TIP Office	Implementing Training Modules to Combat Trafficking of Persons	Tanzania	10/1/2016	9/30/2019	600,000
State's TIP Office	GLOT59 Global Programme Against Trafficking in Persons	Global	10/1/2016	6/30/2019	950,000
State's TIP Office	Counter-Trafficking Training and Technical Assistance	Global	10/1/2016	9/30/2021	1,350,000
State's TIP Office	Strengthening Capacities of Civil Society in Morocco	Morocco	10/1/2016	12/30/2020	922,000
State's TIP Office	Strengthening Institutional Capacity	Mali	10/1/2016	9/30/2019	750,000
State's TIP Office	Strengthening Counter-trafficking Efforts	Indonesia	10/1/2016	2/28/2020	1,039,964
State's TIP Office	Strengthened Capacities for Improved Coordination, Protection	Madagascar	10/1/2016	8/31/2020	750,000
State's TIP Office	Unraveling the Net	Indonesia	10/1/2016	9/30/2020	1,000,000
State's TIP Office	Establishment of Data Collection Systems in Angola, Botswana	Africa region	10/1/2016	12/31/2020	1,000,000
State's TIP Office	IMPACT Trafficking in Persons-TAN: Improving Prosecution and Capacity	Tanzania	10/1/2016	9/30/2021	1,250,000
State's TIP Office	Capacity-building of the INTERPOL Regional Bureau for Southern Africa	Africa region	12/1/2016	11/30/2019	750,000
State's TIP Office	Improving Capacities to Fight Human Trafficking in Lebanon	Lebanon	12/1/2016	3/31/2018	400,000
State's TIP Office	Strengthening Investigation of Trafficking in Persons Cases	Jordan	12/1/2016	1/31/2019	750,000
State's TIP Office	Combating Human Trafficking in Burkina Faso by Strengthening	Burkina Faso	12/1/2016	11/30/2018	715,000
State's TIP Office	Enhancing National and Local Capacities for the Prevention of Trafficking	Ethiopia	12/1/2016	11/30/2018	500,000
State's TIP Office	Strengthening Guyana's Capacity to Effectively Combat Trafficking in Persons	Guyana	12/1/2016	11/30/2020	850,000
State's TIP Office	Engaging Indigenous Women to Prevent and Counter Trafficking in Persons	Bolivia	12/1/2016	3/31/2019	635,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Strengthening Services for Victims of Human Trafficking	Africa region	1/1/2017	2/28/2022	1,250,000
State's TIP Office	Combating Trafficking in Persons Through Victim-centered Approaches in India	India	2/1/2017	1/31/2020	734,599
State's TIP Office	Activating the Bonded Labour System Abolition Act	India	2/1/2017	6/30/2020	750,000
State's TIP Office	To Reduce the Vulnerability and Level of Labour Exploitation	India	2/1/2017	1/31/2019	750,000
State's TIP Office	Innovation in Analytics, Technology and Partnerships	Thailand	2/1/2017	1/31/2019	500,000
State's TIP Office	Ending Impunity for Traffickers in the Thai Fishing Industry	Thailand	2/1/2017	3/31/2019	1,000,000
State's TIP Office	Enhancing Counter Trafficking in Crisis in the Western Balkans	Europe region	2/1/2017	10/30/2018	748,389
State's TIP Office	SEA Fisheries Project (Strengthened Coordination to Combat Trafficking in Persons)	East Asia and Pacific region	4/1/2017	7/31/2020	1,650,000
State's TIP Office	Enhancing Availability and Accessibility of Services	Ukraine	4/1/2017	3/31/2019	750,000
State's TIP Office	Fostering a South American Network for Knowledge Management	East Asia and Pacific region	5/1/2017	12/31/2018	750,000
State's TIP Office	Capacity Enhancement for Victim Centered Investigations	South Africa	6/1/2017	11/30/2020	500,000
State's TIP Office	Study on Trafficking Resilience and Vulnerability	Global	10/1/2017	7/31/2019	700,000
State's TIP Office	Comparative Study of Links Between Trafficking in Persons	Global	10/1/2017	9/30/2020	520,000
State's TIP Office	Addressing Human Trafficking in Emergency Contexts	Global	10/1/2017	9/30/2020	1,700,000
State's TIP Office	Program to End Modern Slavery (PEMS)	Global	10/1/2017	3/31/2022	25,000,000
State's TIP Office	Child Protection Compact - Improving the Government of the Philippines	Philippines	10/1/2017	6/30/2021	3,525,000
State's TIP Office	Protecting At-risk Children Vulnerable to Exploitation- PAVE	Philippines	10/1/2017	6/30/2020	800,000
State's TIP Office	Partnerships in Action to End Child Trafficking in Peru	Peru	10/1/2017	12/31/2021	5,700,000
State's TIP Office	Free Childhood Project: Prevention of Trafficked Children	Peru	10/1/2017	9/30/2020	1,000,000
State's TIP Office	Preventing Conflict-driven Trafficking in Persons	Lebanon	10/1/2017	5/31/2021	1,000,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Building Effective Trafficking in Persons Data in Sri Lanka	Sri Lanka	10/1/2017	9/30/2020	700,000
State's TIP Office	Strengthening Implementation of the United Nations Protocol	Global	2/1/2018	1/31/2022	1,140,000
State's TIP Office	Enhancing Effective Response to Trafficking in Persons in Northern Triangle	Mexico	2/1/2018	12/31/2020	750,000
State's TIP Office	Improving Criminal Justice Response	Cote d'Ivoire	2/1/2018	1/31/2021	825,000
State's TIP Office	Strengthening the Identification and Protection of Victims of Trafficking	Rwanda	2/1/2018	6/30/2020	300,000
State's TIP Office	ATENCAO Brasil	Brazil	2/1/2018	6/30/2020	750,000
State's TIP Office	Combating Trafficking in Zimbabwe	Zimbabwe	2/1/2018	1/31/2021	750,000
State's TIP Office	Countering Trafficking in Persons in the Dominican Republic	Dominican Republic	2/1/2018	9/30/2020	825,000
State's TIP Office	Collaborating Regionally	Mexico, Guatemala, Honduras, El Salvador	2/1/2018	1/31/2020	500,000
State's TIP Office	Improving Provision of Services	Europe region	2/1/2018	12/30/2020	700,000
State's TIP Office	From Harm to Safety: Serbia	Serbia	2/1/2018	12/30/2020	825,000
State's TIP Office	Strengthening Counter-trafficking SADC	Africa region	2/1/2018	1/31/2021	825,000
State's TIP Office	Combating Trafficking in Persons	Sri Lanka	2/9/2018	7/31/2019	700,000
State's TIP Office	Supporting SADC	Africa region	2/9/2018	7/31/2019	500,000
State's TIP Office	Supporting Tunisia's Anti-trafficking Efforts	Tunisia	2/9/2018	10/31/2019	500,000
State's TIP Office	Supporting Implementation of Morocco's Anti-trafficking in Persons Law	Morocco	2/9/2018	1/31/2020	750,000
State's TIP Office	Providing Tailored Training and Technical Assistance	Global	6/15/2018	6/14/2021	1,590,000
State's TIP Office	Improving Victim-centered Trafficking in Persons Cases	Mongolia	8/24/2018	9/30/2019	750,000
State's TIP Office	Jamaica–U.S. Child Protection Compact Criminal Justice Initiative	Jamaica	10/1/2018	12/31/2021	1,300,000
State's TIP Office	Assisting Jamaica to Combat Trafficking in Persons	Jamaica	10/1/2018	12/31/2020	600,000
State's TIP Office	Guatemala Anti-trafficking	Guatemala	10/1/2018	1/31/2021	750,000
State's TIP Office	Strengthening Trafficking in Persons Prevention and Protection in Guatemala	Guatemala	10/1/2018	7/30/2021	2,500,000
State's TIP Office	Jamaica–U.S. Child Protection Compact Project	Jamaica	10/1/2018	5/31/2022	3,200,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
State's TIP Office	Building on Global Fund Momentum (PEMS)	Global	10/1/2018	9/30/2022	21,000,000
State's TIP Office	Anti-human Trafficking Research Programming in West Africa	Sierra Leone, Guinea	10/1/2018	9/30/2023	4,000,000
State's TIP Office	Protection of Juvenile Victims of Trafficking	Lebanon	10/1/2018	9/30/2020	700,000
State's TIP Office	Addressing Trafficking in Persons in Ghana	Ghana	10/1/2018	9/30/2020	500,000
State's TIP Office	Anti-trafficking in Zambia	Zambia	10/1/2018	3/30/2021	500,000
State's TIP Office	Strengthening Counter-trafficking	Sri Lanka	11/1/2018	4/30/2021	1,100,000
State/DRL	Strengthening Civil Society in Mauritania	Mauritania	9/1/2014	2/1/2019	1,927,622
State/DRL	Protect Our Children Senegal	Senegal	10/1/2016	2/1/2019	700,000
State/DRL	Freedom, Rights and Justice: Combating Descendent-based Slavery in Mauritania	Mauritania	8/1/2016	9/1/2019	1,675,594
State/DRL	Supporting Availability and Access to Specialized Services for Victims of Trafficking and Individuals at Risk	Iraq	8/1/2017	08/30/2019	690,630
State/DRL	Combating Slavery in Mali	Mali	8/1/2018	03/1/2020	938,271
State/DRL	Combatting Traditional Descent Based Slavery and Forced Child Begging & Reintegrating Former Slaves in Four West African Countries	Mauritania, Niger, Nigeria, and Senegal	8/1/2018	8/1/2020	938,271
USAID	USAID Asia Counter-trafficking in Persons (CTIP)	Asia-Pacific region	12/21/2016	12/20/2021	21,500,000
USAID	Bangladesh Counter Trafficking-in-Persons Program (BC/TIP)	Bangladesh	10/24/2014	11/30/2020	11,761,664
USAID	The IOMX Campaign for the Prevention of Human Trafficking and Exploitation Asia Pacific Region Phase II; IOM X Bangladesh Roadshow	Bangladesh	09/1/2016	10/1/2018	200,000
USAID	Reducing Vulnerabilities to Human Trafficking	Burma	8/3/2017	12/2/2018	650,000
USAID	Enabling Communities and Stakeholders to Proactively Address Forced Labour	Burma	9/12/2017	1/30/2019	350,000
USAID	NEW Promoting Rule of Law in Myanmar (Counter-trafficking in Persons Component)	Burma	6/28/2018	6/25/2023	730,000
USAID	Promoting Rule of Law Program (Counter-trafficking in Persons Component)	Burma	10/1/2013	10/1/2018	770,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
USAID	Livelihoods and Food Security Trust Fund	Burma	9/29/2012	12/31/2019	661,500
USAID	Cambodia Countering Trafficking in Persons Program	Cambodia	8/25/2015	9/30/2019	8,500,000
USAID	The ASEAN-US Partnership for Good Governance, Equitable and Sustainable Development and Security	Indonesia	9/1/2013	10/1/2018	214,000
USAID	USAID LAOS Counter-trafficking in Persons	Laos	9/25/2017	9/24/2022	1,500,001
USAID	Hamro Samman	Nepal	7/12/2017	7/11/2022	2,765,270
USAID	The Sajhedari Bikaas Partnership for Local Development	Nepal	12/1/2012	5/1/2018	743,922
USAID	Stop Girl Trafficking	Nepal	7/7/2016	7/6/2019	1,500,000
USAID	Singha Durbar-The Lions Palace	Nepal	1/3/2014	10/1/2018	13,765
USAID	Philippines-American Fund	Philippines	6/1/2014	5/1/2018	2,527,468
USAID	USAID Thailand Counter-trafficking in Persons	Thailand	9/18/2017	9/17/2022	10,000,000
USAID	Dignity and Rights	Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan	10/1/2015	9/1/2020	4,300,592
USAID	Reintegration for Trafficking Survivors Project	Uzbekistan	3/29/2011	12/28/2017	1,279,683
USAID	Tushinde Ujeuri	Democratic Republic of the Congo	11/1/2017	10/1/2022	400,000
USAID	Countering Trafficking in Persons in Senegal	Senegal	11/01/2013	12/31/2020	800,000
USAID	Combating Forced Child Begging in Dakar Municipalities (Phase 2 – GTFC, Medina, Pikine Nord and Diamaguene Sicap Mbaou)	Senegal	2/27/2018	2/26/2020	250,000
USAID	Sustainable Fisheries Management Project	Ghana	10/22/2014	10/31/2019	623,862
USAID	Improving Knowledge, Enforcement and Coordination in Counter-trafficking	Rwanda	1/1/2017	10/1/2019	1,360,000
USAID	USAID Mali Justice Project	Mali	12/1/2015	12/1/2020	300,000
USAID	Prevention and Prosecution of Trafficking in Persons and Online Child Pornography in the Dominican Republic	Dominican Republic	11/1/2017	5/30/2020	250,000

Appendix III: Three Key U.S. Agencies' Anti-trafficking in Persons Projects, Active in Fiscal Years 2018–First Half of 2019

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
USAID	Municipal Partnerships for Violence Prevention in Central America and the Dominican Republic	Dominican Republic	9/15/2017	9/30/2019	100,000
USAID	Criminal Justice System Strengthening Project	Dominican Republic	6/1/2015	6/1/2020	100,000
USAID	Civil Society Action for Accountable Justice and Security Project	Dominican Republic	6/1/2015	10/1/2020	7,300,000
USAID	Growing in Peace Project	Guatemala	3/17/2017	3/17/2019	69,646
USAID	Youth and Gender Justice Project	Guatemala	5/20/2016	2/7/2021	2,250,000
USAID	Protecting Victims, Providing Services, and Preventing Human Trafficking in Guatemala	Guatemala	2/15/2018	2/14/2021	2,196,693
USAID	Reintegration and the Prevention of Recruitment	Colombia	10/1/2015	10/1/2019	1,450,000
USAID	Transforming Communities to Protect Women and Girls–UN Women	Colombia	10/1/2018	10/1/2020	2,000,000
USAID	Human Trafficking in the Peruvian Amazon	Peru	7/1/2014	6/1/2020	1,700,000
USAID	Judicial Sector Strengthening Program	Haiti	9/1/2016	2/1/2021	192,000
USAID	Combatting Human Trafficking in Afghanistan	Afghanistan	1/1/2016	1/1/2019	7,098,717
USAID	Combatting Human Trafficking in Afghanistan II–Vulnerable Populations	Afghanistan	1/1/2018	1/9/2020	1,483,950
USAID	Counter-trafficking in Persons–Belarus	Belarus	9/20/2013	9/19/2020	1,910,036
USAID	Counter-trafficking in Persons–Azerbaijan	Azerbaijan	9/30/2015	9/28/2018	600,000
USAID	Counter Trafficking in Persons in Ukraine/Counter-trafficking in Persons Phase II	Ukraine	1/1/2018	1/1/2023	900,000
USAID	Migrant and Refugee Human Rights Project	North Macedonia	9/9/2016	3/8/2018	673,301
USAID	Positive Life Alternatives for Egyptian Youth At-Risk of Irregular Migration	Egypt	9/30/2015	12/29/2018	2,071,465
USAID	Peru Trafficking in Persons Victim Identification and Reintegration Study	Peru	12/1/2017	1/1/2020	342,708
USAID	Impact Evaluation for USAID / Cambodia Counter-trafficking in Persons Activity	Cambodia	6/1/2016	1/1/2020	684,972
USAID	Global Labor Program	Global	2/1/2016	1/31/2021	2,500,000
DOL	FLIP	Ghana	12/1/2017	5/30/2021	2,000,000
DOL	Paraguay Okakuaa (Paraguay Progresses)	Paraguay	11/3/2015	5/31/2021	683,558

**Appendix III: Three Key U.S. Agencies' Anti-
trafficking in Persons Projects, Active in Fiscal
Years 2018–First Half of 2019**

Agency/ responsible agency unit	Project name	Location of project	Start date	End date	Anti-trafficking award amount (in dollars)
DOL	Engagement of Labor Stakeholders to Better Understand and Address Indicators of Forced Labor	Peru	12/8/2017	12/7/2021	2,000,000
DOL	Cooperation On Fair, Free, Equitable Employment Project	Latin America region	12/1/2017	3/31/2022	2,000,000
DOL	Palma Futuro	Colombia and Ecuador	1/1/2019	12/31/2022	6,000,000
DOL	CLIMB	Bangladesh	12/15/2017	2/28/2021	2,000,000
DOL	Sakriya	Nepal	10/1/2018	9/30/2021	2,600,000
DOL	SAFE Seas	Indonesia and Philippines	12/1/2017	11/30/2021	5,000,000
DOL	FAIR FISH	Thailand	1/1/2019	12/31/2022	4,000,000
DOL	From Research to Action	Global	8/3/2018	8/2/2021	2,800,000 ^a
DOL	ATLAS	Global	1/1/2019	12/31/2022	7,500,000
DOL	Bridge	Global	7/27/2015	9/2/2020	14,395,138
DOL	MAP 16	Global	12/9/2016	9/30/2022	320,000
DOL	Support for the Implementation of the Decent Work Country Programme in Uzbekistan	Uzbekistan	12/19/2014	6/30/2020	6,000,000
DOL	Consolidating and Disseminating Efforts to Combat Forced Labor in Brazil and Peru	Brazil and Peru	12/27/2012	12/31/2018	6,800,000
DOL	Global/Monitoring and Evaluation Toolkit: Office of Child Labor, Forced Labor, and Human Trafficking Sector-specific Interventions and Cross-cutting Themes	Global	9/1/2016	8/31/2018	250,000
DOL	Closing the Child Labor and Forced Labor Evidence Gap: Impact Evaluations	Global	12/15/2014	6/19/2020	999,993 ^a

Legend: State's TIP Office = State's Office to Monitor and Combat Trafficking in Persons; State/DRL = State's Bureau of Democracy, Human Rights, and Labor

Source: GAO analysis of information provided by State, USAID, and DOL. | GAO-21-53

^aDOL officials told us that the focus of this project is child labor; however, the project also supports a limited number of activities to address human trafficking. DOL could not isolate the funding specific to anti-trafficking; therefore, the actual funding amount for anti-trafficking may be less.

Appendix IV: Projects Awarded under the Program to End Modern Slavery in Fiscal Years 2018 and 2019

The Department of State's (State) Program to End Modern Slavery (PEMS) aims to reduce the prevalence of modern slavery in communities worldwide, according to State. State's Office to Monitor and Combat Trafficking in Persons (TIP Office) has awarded \$75 million to three prime award recipients and one external evaluator under PEMS in fiscal years 2018 through 2020.¹ The Global Fund to End Modern Slavery (GFEMS) was the only prime award recipient to administer subawards—grants or contract administered by the prime award recipient—for anti-trafficking projects under PEMS, as of September 30, 2019.² GFEMS had awarded eight anti-trafficking in persons projects, worth \$9.89 million, in fiscal years 2018 and 2019.³ Table 11 provides more information on these GFEMS projects.

¹The three PEMS prime award recipients are the Global Fund to End Modern Slavery, the University of Georgia Research Foundation, and the Freedom Fund.

²GFEMS is an international fund that aims to develop a global strategy to end modern slavery by increasing resources, engaging government and the private sector, funding new programs and technologies, and promoting impact assessment across partners and programs. According to State's TIP Office, GFEMS was established in 2015.

³State's TIP Office officials told us that they cancelled one of these projects because the subawardee did not fully adhere to the subaward's terms and conditions. The total funding amount for GFEMS's anti-trafficking in persons projects includes the almost \$90,000 in funding disbursed (of the approximately \$630,000 award) for the cancelled project.

Appendix IV: Projects Awarded under the Program to End Modern Slavery in Fiscal Years 2018 and 2019

Table 11: International Anti-trafficking in Persons Projects Awarded under the Department of State’s Program to End Modern Slavery in Fiscal Years 2018 and 2019, as Identified by State

Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding (in dollars)	Project goal
Fair International Recruitment against Slavery and Trafficking (FIRST) ^a	Vietnam	Sept. 2018	May 2020	804,817	Secure private sector commitment to establish and implement ethical recruitment standards.
Safe and Sound: Ha Giang	Vietnam	Sept. 2018	Dec. 2020	842,114	Establish a comprehensive anti-trafficking ecosystem, addressing sex trafficking from Vietnam to China.
Youth Career Initiative – Hanoi and Mumbai	Vietnam and India	Sept. 2018	Jan. 2022	486,113	Support trafficking survivors and those vulnerable to trafficking by working with the hotel industry to provide job training, placement, and mentorship.
Advancing Rule of Law in the State of Maharashtra: Supporting the Implementation of a Comprehensive Sex Trafficking Response	India	Sept. 2018	Aug. 2021	2,436,829	Combat online sex trafficking by building the capacity of Maharashtra’s Anti-Human Trafficking Units and providing free legal services, among other things.
India Consortium for Skilling and Safe Migration in Construction	India	Oct. 2018	Mar. 2021	3,170,672	Support migrant workers in the construction sector through training and ethical recruitment, among other things.
The Fair Recruitment Model: An End-to-End Market Solution to Make Exploitative Recruitment Unprofitable	Philippines	Oct. 2018	Mar. 2021	1,086,509	Establish a fair employment recruitment agency, which will place low-skilled Filipino workers in employment abroad through ethical practices.
Anti-Slavery Project for Overseas Philippines Domestic Workers	Philippines	Sept. 2018	June 2021	971,793	Develop an integrated case management system and inter-agency task force to address the trafficking of overseas Filipino workers.
Mobile Training Plus ^b	Philippines	Sept. 2018	May 2019	88,946 ^c	Support migrant workers and returning overseas workers through training and job placement.

Source: GAO analysis of information provided by the Department of State. | GAO-21-53

^aThe project was formerly referred to as “Enhancing Fair and Ethical Recruitment to Combat Modern Slavery, including Trafficking and Forced Labor in International Migrant Work,” according to Department of State officials.

^bThe Department of State’s Office to Monitor and Combat Trafficking in Persons officials told us that it cancelled this project because the subawardee did not fully adhere to the subaward’s terms and conditions.

^cThis amount represents the funding disbursed for the project before its cancellation. The total award amount was approximately \$630,000 in funding.

Appendix V: Final Evaluations of U.S. International Anti- trafficking in Persons Projects Examined Project Effectiveness

As of March 31, 2020, the Department of State (State), the U.S. Agency for International Development (USAID), and the Department of Labor (DOL) had completed eight final evaluations of U.S. international anti-trafficking projects that were active from fiscal years 2016 through 2018 and that examine project effectiveness—the extent to which projects achieved their objectives.¹ According to the Organization for Economic Cooperation and Development’s Development Assistance Committee (OECD/DAC), effectiveness focuses on a project’s attributable achievements and results, in contrast to impact, which reviews a project’s contribution to higher-order effects. The final evaluations examined a variety of projects that focused on the “3 Ps approach”—prosecution, protection, and prevention—for human trafficking in various countries.

Following are three examples of final evaluations’ findings about the effectiveness of specific projects that aimed to (1) support survivors’ recovery and reintegration in Sierra Leone, (2) reduce forced child begging in Senegal, and (3) reduce child labor in Paraguay. These projects illustrate various efforts funded by State, USAID, and DOL to combat international human trafficking in communities within specific countries.

¹OECD/DAC established this definition for effectiveness in 2002. In 2019, OECD/DAC updated the definition to “the extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.” See OECD/DAC, *Glossary of Key Terms in Evaluation and Results Based Management* (2002) and OECD/DAC, *Better Criteria for Better Evaluation: Revised Evaluation Criteria, Definitions, and Principles for Use* (2019).

Supporting survivors' recovery and reintegration in Sierra Leone.

According to State's Office to Monitor and Combat Trafficking in Persons (TIP Office) officials, the "Trafficking in Persons Recovery Center" project had an award amount of \$1.2 million and a time frame of October 2013 to September 2018. According to the evaluation, the project aimed to support trafficking survivors' recovery and reintegration into their communities by providing holistic and comprehensive care services.² Overall, the project's final evaluation found that the recovery center provided high-quality, comprehensive aftercare services for primarily young female trafficking survivors.³

The final evaluation found that the project achieved certain aspects of survivors' recovery and reintegration. The evaluation noted that these findings should be considered exploratory because of incomplete data and small sample sizes.⁴ For survivors' recovery, the evaluation found that the center's shelter services helped improve clients' physical health, trauma-related symptoms, coping skills, self-confidence, self-protection skills, and academic or vocational skills during residential care.⁵ Clients did not report significant improvements in mental health symptoms related to aggression and social behaviors during residential care. For survivors' reintegration, the evaluation found that the center was somewhat effective

²These services included safe residential care, short-term clinical care, legal support, reintegration support, and case management services. The evaluation focused on project implementation and results since October 2015, when the project reinstated activities after an Ebola epidemic, which limited activities for nearly a year.

³The evaluation noted that its findings were not conclusive because it applied a non-experimental design. As such, the evaluation did not establish definitive causal relationships between program inputs, outputs, and outcomes. State's TIP Office officials told us that an experimental design raised ethical considerations because the design would require withholding project services from some survivors.

⁴For survivors' recovery outcomes, the evaluation relied on data collected from a client care assessment tool to determine effectiveness. However, these data represented a small sample size and were incomplete because recovery center staff did not consistently administer the tool during all three administration periods to all clients. For survivors' reintegration outcomes, the evaluation relied on data collected from a post-reintegration assessment tool. According to the evaluation, the sample included 18 reintegrated clients, who were not representative of the recovery center clientele.

⁵The evaluators used the following indicators to determine the extent of trafficking survivors' recovery during the course of residential care: (1) reduced physical health symptoms; (2) reduced mental health symptoms, including trauma-related symptoms; (3) improved coping skills; (4) improved prosocial behaviors; (5) improved self-confidence; (6) improved self-protection skills; (7) improved academic or vocational function; and (8) improved spiritual resources.

in reintegrating trafficking survivors into their respective communities.⁶ The evaluators stated that they could not make definitive statements about reintegration outcomes because there are no established norms regarding reintegration outcomes for trafficking survivor programs. The evaluation found that the center reported losing contact with only about 3 percent of their reintegrated clients, which suggested that few reintegrated clients were re-trafficked during the project's follow-up period. According to the evaluation, the majority of clients demonstrated positive reintegration outcomes in terms of family acceptance and support, community acceptance, and psychosocial adjustment, including self-confidence and coping skills. However, the evaluation found moderate to high rates of family risk factors for 25 percent of reintegrated clients. Additionally, 39 percent of reintegrated clients showed moderate to high rates of poor educational or vocational performance. Further, 24 to 35 percent of reintegrated clients demonstrated moderate to high rates of trauma-related symptoms and problematic self-protection skills. The evaluators stated that some of the poor reintegration outcomes might be related to high rates of economic insecurity in post-reintegration families.⁷

The evaluation found that the project faced challenges in achieving trafficking survivors' successful recovery and reintegration. According to the evaluation, an Ebola epidemic limited the project's activities for nearly a year. Further, the evaluation found that financial sustainability was an important challenge for the recovery center, partly because of the lack of a stable source of funding for the center after the project's completion (e.g., government funding) and the high cost of providing quality

⁶The evaluators used the following indicators to determine the extent of trafficking survivors' reintegration: (1) the percentage of reintegrated clients the recovery center maintained contact with until discharge from the program, (2) low levels of exploitation risk factors, (3) high levels of psycho-social adjustment, (4) high levels of family acceptance and support, (5) high levels of community acceptance, and (6) high levels of academic or vocational function.

⁷While the center provided reintegration support packages (including funds for school fees, clothing, and income-generating projects) for post-reintegration caregivers as a means to reduce economic risk factors in these families, all respondents indicated the packages were only sufficient to meet economic needs for 3 to 6 months. For example, packages were not large enough to fund income-generating projects after paying for school fees and clothing. Additionally, according to the evaluation, most family members lacked training on how to run a business, so they were not able to generate sustainable income from their projects.

comprehensive care.⁸ The project temporarily closed the recovery center from July 2015 to October 2015 because of a lapse in funding.

Reducing forced child begging in Senegal. According to USAID officials, the “Reduce Abuses against *Talibés* in Dakar” project’s first phase had an award amount of \$200,000 and a time frame of January 2014 to April 2016.⁹ According to the evaluation, the project aimed to reduce forced child begging through a community-based approach with local participants, such as municipal leaders and religious leaders, in two municipalities in Dakar, Senegal.¹⁰ Overall, the evaluation found that the project was successful in reducing forced child begging in one municipality, but could not identify the extent to which the project reduced it in a second municipality.¹¹

According to the evaluation, the project reduced child begging in one of the two municipalities, which aimed to eliminate begging associated with Quranic schools and individual children from the municipality begging in

⁸According to the evaluation, while it is currently unknown what level of aftercare services are needed to obtain successful reintegration outcomes for trafficking survivors, preliminary evidence indicates that comprehensive assistance helps trafficking survivors’ reintegration.

⁹According to USAID officials, the final evaluation examined this phase of the project. The second phase of the project had an award amount of \$250,000 and a time frame of February 2018 to February 2020. USAID officials told us that an assessment completed in June 2020 discusses the progress made in reducing forced child begging during the project’s second phase. According to State’s 2020 *Trafficking in Persons Report*, forced child begging is one of the main forms of trafficking found in Senegal, where children, commonly known as *talibés*, have been forced to beg in the streets as part of their studies in Quranic schools, called *daaras*.

¹⁰The evaluation noted that the project enabled each municipality to define the reduction in child begging.

¹¹The evaluation noted that it could not fully attribute the reduction in forced child begging to the project because it was not an impact evaluation and other factors may have had an effect on the project outcomes. For example, in 2016 the president issued a decree to end organized child begging on the street. The evaluation noted that this decree resulted in the collection and removal of children found begging in the street to holding areas. Further, to determine the extent to which the project reduced forced child begging, the evaluation measured the overall number of *talibés* who begged and the amount of time spent begging, for both *talibés* associated with Quranic schools and those found in the streets. According to the evaluation, there was no project baseline data collection for either the number of children begging on the streets or the time spent begging, which limited the evaluation’s ability to determine a reduction of begging between the situation before and after the project.

the streets.¹² The evaluation found that none of the 113 *talibés* interviewed in their respective Quranic schools continued to practice begging after the start of the project. In addition, the evaluation found that the first municipality managed to close the three Quranic schools that practiced begging, using project funds to repatriate *talibés* to their place of origin. Further, the five *talibés* found begging in the streets of the first municipality were from other parts of the country, according to the evaluation. Therefore, the evaluation found that the project helped the municipality reduce begging to zero, achieving its target.

In contrast, the evaluation could not identify the extent to which the project reduced child begging in the second municipality, which aimed to reduce the number of hours children spent begging by 50 percent.¹³ The evaluation found that *talibés* in the second municipality spent approximately the same average number of hours begging over the course of the project.¹⁴ In addition, two of the three Quranic schools in the second municipality continued to require begging, according to the evaluation.¹⁵ Further, the evaluation found 59 children begging in the streets of the second municipality.

The evaluation also found that the project faced several challenges to achieving its objective. While there was wide-ranging community support for the project, religious leaders of Quranic schools did not change their attitudes about child begging, according to the evaluation. They supported the idea of begging as a humility-building part of Quranic education and, therefore, did not support the elimination of begging, but instead its regulation to reduce the potential for abuse among begging *talibés*. Additionally, the evaluation found that a primary concern for community members was a lack of clarity in addressing forced child begging cases through legal channels or through formal support services

¹²The evaluation found that a fire in a Quranic school resulting in the death of nine *talibés* increased willingness among community members in the municipality to discuss the sensitive issues surrounding human trafficking and *talibés* begging.

¹³According to USAID officials, the second municipality became an important partner in combating forced child begging during the project's second phase.

¹⁴Given the incomplete baseline data, the evaluation relied on *talibés* to self-report the number of hours spent begging at the project's start and at the time of the evaluation interview. The evaluation noted that the self-reported number of hours could be inaccurate.

¹⁵The third Quranic school was closed because of a lack of space to operate, not because of project efforts.

for trafficking survivors. For example, community members reported not knowing how to support children found begging in the streets because of a lack of support services. Further, the evaluation found that the project faced challenges engaging national stakeholders, whose role in addressing forced child begging was unclear.

Reducing child labor in Paraguay. According to DOL officials, the “Paraguay Okakuaa” (Paraguay Progresses) project’s forced labor component had an award amount of approximately \$683,000 and a time frame of November 2015 to May 2021.¹⁶ According to the evaluation, the project aimed to reduce child labor in specific communities in Paraguay. Overall, the evaluation found that the project effectively reduced child labor, despite difficulties quantifying the scope of child labor reduction for project participants.¹⁷ Specifically, the evaluation noted a reduction in the percentage of beneficiary children engaged in child labor¹⁸ and found that the project helped reduce child labor for project participants by successfully promoting the value of education among children, adolescents, and their families. For example, the evaluation found that those who participated in the project’s educational activities developed personal and professional goals to pursue. The evaluation found that the project’s educational activities filled an important gap in the complementary education and recreational services offered to children and adolescents. According to the evaluation, most stakeholders generally agreed that the project provided a foundation on which to continue reducing child labor through educational opportunities.

The evaluation also found that the project faced challenges related to implementation. For example, the project faced some difficulty integrating models, concepts, and structures among stakeholders during the early stages of implementation. According to the evaluation, stakeholders

¹⁶According to the evaluation, the project had a total award amount of \$6.68 million.

¹⁷According to the evaluation, the project lacked consistent baseline data because measurements were conducted approximately every 6 months when new participants joined. As such, participants enrolled at the start of the project were considered in several baseline measurements. Therefore, the evaluation stated that comparisons between the baseline and final values were limited and, as a result, it was difficult to establish a unique numeric value for any change in child labor because of the project.

¹⁸Without an impact analysis, the evaluation noted that the results could not be fully attributed to the project. Additionally, the evaluation found that in some cases, the rates of child labor among targeted households fluctuated over the project period, indicating the influence of external factors. For example, the recession in the sugarcane sector and subsequent migration of many producers and their families may explain such fluctuations.

**Appendix V: Final Evaluations of U.S.
International Anti-trafficking in Persons
Projects Examined Project Effectiveness**

reported that the participant selection process was slow and complex, which created initial delays in reaching project targets. In addition, the evaluation found that changes in the central government slowed implementation, as the project had to work with new government partners, who needed time to examine the project and its activities. Despite these challenges, the evaluation found that the project delivered numerous quality products and services, reaching and sometimes exceeding most of its targets.

Appendix VI: Comments from the U.S. Agency for International Development



Chelsa Gurkin
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

Re: *Human Trafficking: Agencies Have Taken Steps to Strengthen International Anti-trafficking Projects* (GAO-21-53)

Dear Ms. Gurkin:

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Human Trafficking: Agencies Have Taken Steps to Strengthen International Anti-trafficking Projects* (GAO-21-53).

I would like to express my gratitude to you and your colleagues for the meticulous approach to this audit; USAID considers this experience with the GAO to be a form of best practice. Last October, GAO colleagues attended USAID's Evidence Summit for Countering Trafficking in Persons (C-TIP), during which interagency partners, academics, and other experts shared research and methods to fill gaps in data to strengthen global C-TIP programs. This included presentations on USAID's C-TIP research and evaluations. We appreciate the time that the GAO's staff spent over the two days of the Summit, including by listening to numerous technical presentations and participating in breakout sessions, to deepen their understanding of the challenges to evaluating anti-trafficking projects. Likewise, GAO staff members attended the USAID World Day Against Trafficking event on July 30, 2020, which brought together our team, interagency colleagues, and implementing partners to discuss the effects of COVID-19 on trafficking in persons (TIP) and best practices to counter it. It is clear from the draft report that the GAO's staff developed a thorough and nuanced understanding of the crime of modern slavery and accurately and fairly conveyed the challenges and responses of improving data, resources and the design of C-TIP projects. Lastly, USAID was most impressed by the GAO staff's professional conduct in working us to ensure an accurate and fair report of our activities; they were responsive to questions and concerns and immediately joined calls to discuss them.

USAID is committed to using evaluations to strengthen our C-TIP projects, in accordance with Chapter 201 of our Automated Directives System (ADS). USAID has addressed challenges identified by the GAO, including minimal data, ethical considerations, and limited resources, through interagency collaborations and funding studies, surveys, and impact evaluations. The Agency is following our policies for using evaluations by reviewing findings and recommendations from mid-term evaluation reports to strengthen current projects immediately, and those from final evaluations to examine projects' effectiveness and inform our future programming. The Agency also recently committed additional funds for further learning, evaluation, and research on human trafficking to develop tailored interventions and innovations for our Missions to better understand and combat this crime.

**Appendix VI: Comments from the U.S. Agency
for International Development**

Over the past year, USAID worked closely with the Office to Monitor and Combat Trafficking in Persons at the U.S. Department of State to develop and implement revised C-TIP standard indicators, and also developed two new, Agency-specific custom indicators. They will help the Agency improve the design of our projects and collect relevant data that will measure their effectiveness. Additionally, USAID is taking steps to revise our Agency C-TIP Policy, which includes improving the application of learning, evaluation, and research; promoting trauma- and survivor-informed approaches in our C-TIP programming; inviting trafficking survivors and Department of State colleagues to provide feedback on the design and implementation of C-TIP policy and programming; improving integration and coordination across USAID; and requiring that USAID staff complete training on our C-TIP Code of Conduct within their first two years of employment. USAID is most proud of following the lead of the Department of State to elevate the voices of survivors to aid in the design and implementation of policies and programs that affect them. Trafficking survivors can play a critical role to help create and teach appropriate techniques for identifying and interviewing trafficking victims, which ultimately will increase data sources and inform our programs.

I am transmitting this letter and the enclosed comments from the USAID Mission in the Republic of Sénégal for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our C-TIP programs.

Sincerely,

Frederick M. Nutt

Frederick Nutt *Oct 14, 2020*
Assistant Administrator
Bureau for Management

Enclosure: a/s

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT ON
THE DRAFT REPORT PRODUCED BY THE U.S. GOVERNMENT
ACCOUNTABILITY OFFICE (GAO) TITLED, *HUMAN TRAFFICKING: AGENCIES
HAVE TAKEN STEPS TO STRENGTHEN INTERNATIONAL ANTI-TRAFFICKING
PROJECTS (GAO-21-53)***

The U.S. Agency for International Development (USAID) would like to thank the U.S. Government Accountability Office (GAO) for the opportunity to respond to this draft report. We appreciate the extensive work of the GAO's engagement team.

Comments from USAID's Mission in the Republic of Sénégal related to forced child begging in municipalities in metropolitan Dakar (pages 67-69):

USAID/Sénégal is concerned that the language in GAO-21-53 pulls exclusively from the MSI report of 2017, and the interpretation of some of the data and observations focuses exclusively on where the project stood in 2016, without taking into account any of the work in its second phase. As it stands now, the report is missing the current state of the problem of child begging in Dakar and the true impact of our interventions.

Below is a statement from a more recent assessment (attached, also done by MSI) commissioned by USAID/Sénégal that reports on Phase 1 and Phase 2 of our program on countering forced child begging. USAID/Sénégal requests the GAO to consider this newer assessment in preparing its final report:

USAID/Sénégal Democracy, Governance, Human Rights and Peace (DRGP) had an initiative working with four municipalities in Dakar to reduce forced child begging. The initiative began in 2013 in two municipalities and had mixed results by the end of the first phase. The determining difference appeared to be the lack of political will and public understanding of the real dangers of forced child begging in boarding daaras (traditional Quranic schools). The first commune, the municipality of Médina, had experienced a fire in one of the boarding daaras that resulted in the death of nine young talibés (Islamic students) who were locked in the daara while the Serigne Daaras (Islamic teacher) was at his own private residence. This experience raised public awareness of the dangers of boarding daaras and gave the mayor the political will to ban all boarding daaras that force children to beg. In Médina, the three daaras identified as forcing children to beg were all closed by the Mayor's office. In the second commune, the municipality of Gueule Tapee Fasse Colobane (GTFC), the project's approach was not to ban daaras that forced children to beg, but to reduce the number of hours that children were forced to beg and to provide feeding and care for the talibés, as well as French grammar courses. The project evaluation conducted in 2016 found that the number of hours of forced begging of the talibés surveyed had not diminished and had, in fact, risen since the intervention's launch.

The second phase of this project moved into two new communes in 2018: Pikine Nord and Diamaguene-Sicap Mbao, and continued the work with the first phase communes of Médina and

**Appendix VI: Comments from the U.S. Agency
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GTFC. During the second phase in GTFC, a commune-based social mobilization with citizens and key stakeholders, including Serignes Daaras, was organized around the fight against forced child begging. Events like a “day of the talibés” are organized by the Ndeyu Daaras (women community members - usually mothers and grandmothers) and Bajanu Gox (men of the community) every three to four months, bringing together all municipal councilors, district delegates, Bajanu Gox, Ndeyu Daara and community leaders in support of the talibés and daaras in the commune. In addition, regular community fora are organized to discuss the situation of the talibés and develop community consensus around the need to stop forced child begging. The association of Ndeyu Daaras in the commune benefited from a revolving credit fund that allowed them to develop income-generating activities, the funds from which are used to support the daaras. These interventions have generally contributed to improving the living and learning conditions of the daaras.

The new additions to the project began by completing a mapping of all daaras and identified those daaras that practice forced child begging. Both communes developed action plans in a participatory way, incorporating Ndeyu Daaras, community members, and religious leaders into the process of setting expectations for combating forced child begging. In addition, the Serignes Daaras and Ndeyu Daaras, as key actors, were trained and made aware of the basic concepts of child exploitation. These project activities were part of a major emphasis on community mobilization to combat child forced begging. Since refining the program’s approaches, several new results have been identified. The commune of Pikine Nord officially outlawed forced child begging in their commune through a Mayoral decree released in 2019. Based on interviews with both project coordinators in each commune, their approach is to let these boarding daaras continue to operate, and there have been some daaras that have publicly declared that they would no longer practice forced child begging. The emphasis of their approach is on community-based behavior change to explain child exploitation and how forced child begging is exploitative. While both communes have created a citizen monitoring group, they do not have the ability to monitor the daily begging practices of these children to ensure that mistreatment does not continue to occur. There are also no performance measurement indicators in place to require the communes to track begging practices in order to document any actual reduction in forced child begging, as this was not the intent of the project, but could and should be built into future iterations. Based on the municipal approach, Mayors across Dakar are interested in replicating the project, and the Mayor who oversees all communes in Dakar has expressed her interest in replicating the approach across all Dakar communes as it has been determined that long-term eradication of this practice will require behavior change on behalf of the entire community. This approach could become a model to help set local standards for daara operations and treatment of talibés both within and outside of the daara.

Text of Appendix VI: Comments from the U.S. Agency for
International Development

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Chelsa Gurkin
Director, International Affairs and Trade

U.S. Government Accountability Office
441 G Street, N.W.
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Re: Human Trafficking: Agencies Have Taken Steps to Strengthen
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Assistant Administrator Bureau for Management
Enclosure: a/s

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Diameguene-Sicap Mbao, and continued the work with the first phase communes of Médina and

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GTFC. During the second phase in GTFC, a commune-based social mobilization with citizens and key stakeholders, including Serignes Daaras, was organized around the fight against forced child begging. Events like a "day of the talibés" are organized by the Ndeyu Daaras (women community members - usually mothers and grandmothers) and Bajanu Gox (men of the community) every three to four months, bringing together all municipal councilors, district delegates, Bajanu Gox, Ndeyu Daara and community leaders in support of the talibés and daaras in the commune. In addition, regular community fora are organized to discuss the situation of the talibés and develop community consensus around the need to stop forced child begging. The association of Ndeyu Daaras in

the commune benefited from a revolving credit fund that allowed them to develop income-generating activities, the funds from which are used to support the daaras. These interventions have generally contributed to improving the living and learning conditions of the daaras.

The new additions to the project began by completing a mapping of all daaras and identified those daaras that practice forced child begging. Both communes developed action plans in a participatory way, incorporating Ndeyu Daaras, community members, and religious leaders into the process of setting expectations for combating forced child begging. In addition, the Serignes Daaras and Ndeyu Daaras, as key actors, were trained and made aware of the basic concepts of child exploitation. These project activities were part of a major emphasis on community mobilization to combat child forced begging. Since refining the program's approaches, several new results have been identified. The commune of Pikine Nord officially outlawed forced child begging in their commune through a Mayoral decree released in 2019. Based on interviews with both project coordinators in each commune, their approach is to let these boarding daaras continue to operate, and there have been some daaras that have publicly declared that they would no longer practice forced child begging. The emphasis of their approach is on

community-based behavior change to explain child exploitation and how forced child begging is exploitative. While both communes have created a citizen monitoring group, they do not have the ability to monitor the daily begging practices of these children to ensure that mistreatment does not continue to occur. There are also no performance measurement indicators in place to require the communes to track begging practices in order to document any actual reduction in forced child begging, as this was not the intent of the project, but could and should be built into future iterations. Based on the municipal approach, Mayors across Dakar are interested in replicating the project, and the Mayor who oversees all communes in Dakar has expressed her interest in replicating the approach across all Dakar communes as it has been determined that long-term eradication of this practice will require behavior change on behalf of the entire community. This approach could become a model to help set local standards for daara operations and treatment of talibés both within and outside of the daara.

Appendix VII: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Leslie Holen (Assistant Director), Jon Fremont (Analyst-in-Charge), Maria Psara, Miranda Wickham, Debbie Chung, and Neil Doherty made key contributions to this report. The team benefited from the assistance of Ashley Alley, Natalie Brodsky, Leia Dickerson, Madeline Kasik, Benjamin Licht, James Michels, Michael Silver, and K. Nicole Willems.

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