October 2018 Vol. 16 No. 10
This issue highlights how financial institutions, hospitals, hotels/motels and housing needs both foster and prevent human trafficking.

The Human Trafficking - Business Connection

Report from Polaris

‘On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking’ is the title of a 170-page July 2018 Report from Polaris. It features six businesses that impact human trafficking: social media; financial services; hotels/motels; transportation; health care; and housing. This issue of ‘Stop Trafficking’ will highlight four of these businesses. (See pg. 8 for the link to the full Report.)

Suspicion Leads to Advocacy

Jenny came to the emergency department with a list of vague issues.
She complained of abdominal pain, nausea, headache, generalized weakness, feeling fatigued and having an occasional cough. Her symptoms had been going on for longer than a week. Her vital signs were all normal. The triage doctors cont. pg. 3

Fear Leads to Inaction

“...[My trafficker] was sitting outside in the [hotel] parking lot waiting. He knew I was going to leave, so he was just watching me... He broke the TV, threw it over the railing, took the phone, smashed my face, put ashtrays in the pillowcase and was swinging it [at me]. I was screaming, but nobody did [anything]. It was all just girls that had pimps themselves [around the immediate area], so nobody’s going to say anything. I remember he took my car, he took my phone and...”

Doctors cont. pg. 3

Hotels cont. pg. 3
### Types of Trafficking Intersect with Types of Business

The table to the right lists forms of trafficking and where they intersect with businesses as indicated in the Polaris Report. The legend for the business columns is shown below.

- • indicates use without further delineation.

#### Type of Financial Service:
1. Retail Banking (Personal Banking); 2) Commercial Banking (Business Banking); 3) Credit/Debit Cards (including pre-paid); 4) Money Service Businesses (including Money Transfer Services); 5) Retail Check Cashing; and 6) Formal Paychecks/Payroll

#### Type of Social Media:
1) Facebook; 2) Instagram; 3) Snapchat; 4) Chat apps (Kik, Kakao Talk, WeChat, WhatsApp); 5) Dating Sites and Apps; 6) YouTube

#### Types of Temporary Visas:
1) A-3/G-5; 2) H-2A; 3) H-2B; 4) B-1; 5) J-1; 6) F-1; 7) H-1B

#### Types of Transportation
1) Private vehicles (incl. rentals and business); 2) airlines; 3) trains; 4) buses; 5) ride sharing and taxis

#### Types of Health Care Services:
1) Emergency; 2) Pediatrics; 3) Mental Health; 4) Substance Abuse Treatment; 5) Reproductive Health; 6) Residential Care Facilities

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<td>Residential Sex Trafficking</td>
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<td>Restaurants &amp; Food Service</td>
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<td>Traveling Sales Crews</td>
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Health Professionals Challenged to Assist Victims

Global Centurion conducted research in 2014 to reveal the occasions when medical professionals interacted with trafficked persons but were unaware. The study provided much statistical evidence and concluded, “Victims of sex trafficking suffer severe physical and psychological health consequences as a result of their trafficking. Victims frequently have contact with medical professionals in a variety of health care settings, including hospital emergency wards, neighborhood clinics, women’s health clinics, and Planned Parenthood clinics, as well as private practices. Violence-related injuries, serious illness or disease, pregnancy, birth control, and abortion, substance abuse, addiction and overdose, as well as serious psychological problems, are all reasons why substantial numbers of victims seek treatment.”

“Because they are first responders, health care providers have unique opportunities to intervene on behalf of trafficking victims. Health care institutions must develop protocols for training, identifying, and treating sex trafficking victims. Medical personnel must increase efforts to understand the nature and scope of the problem of sex trafficking in the U.S. in order to improve their capacity to identify victims. This is especially true when they have the ability to speak privately with victims in a context where their statements may be admissible in a later prosecution of their traffickers."

Read the full account of Dr. Erika Kube, an emergency room doctor in Ohio, to see how knowledge among health care professionals is key to assisting trafficked persons:

Financial Services

Victims of labor trafficking in domestic work can pay between $3,000 - $9,000 in recruitment fees. The result of these fees is that many workers arrive for their first day of work already deeply indebted to their employer or recruiter. This debt is a coercive tactic used to trap the worker until the debt can be repaid. Industries like agriculture, landscaping, and hospitality employ large numbers of workers on temporary visas commonly associated with predatory recruitment practices.

One survivor who made at least four separate deposits totaling over $5,000 into her recruiter’s account in the Philippines, pleaded, “I wish [someone] would have asked what all that money was for.”

Workers reported having to take out a loan to cover the cost of recruitment. The interest rates on these loans ranged anywhere from 5% to 79%. Thus financial burdens of recruitment fees can be devastating in and of themselves but they are also foster trafficking. A worker who chooses to come to the U.S. for a well-paid temporary job is going to be that much more reluctant to speak out about exploitation if that worker fears having no other way to pay back massive debts incurred to get the job in the first place. Those duped into sex trafficking have even less hope of repaying a debt.

See pg. 4 for a list of potential red flags for human trafficking that can be detected by persons involved in financial institutions.

Doctors cont. from pg. 1

nurse noted that she looked well and not acutely ill.
I noticed Jenny as she walked back to her room. It looked strange to me that an otherwise healthy young woman was leaning on her mother, who held her by the arm and guided her to the room.

Hotels cont. from pg. 1

all that. So I was just sitting in the parking lot and crying [and] bleeding. The [front desk clerk] was just like, ‘I’m not getting involved in all that’ and just said, ‘you guys can’t get a room here anymore, I’m keeping your deposit.’ [The front desk clerk] wouldn’t even let me use the phone to call police.”

See pg. 4 for a list of potential red flags for human trafficking that can be detected by persons involved in financial institutions.
## Red Flags of Trafficking within the Financial Services Industries

<table>
<thead>
<tr>
<th>Recruitment, Transportation and Exploitation Stages</th>
<th>Who Could Detect</th>
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<tbody>
<tr>
<td>Transactional activity (credits and/or debits) inconsistent with a customer’s alleged employment, business or expected activity, or where transactions lack a business or apparent lawful purpose. Cash deposits or wire transfers are kept below $3,000 or $10,000 in apparent efforts to avoid record keeping requirements or the filing of Currency Transaction Reports (CTRs), respectively.</td>
<td>Banks/Credit Unions, Check Cashers/Prepaid Card Provider/Money Transmitters/Casinos</td>
</tr>
<tr>
<td>Frequent outbound wire transfers, with no business or apparent lawful purpose, directed to countries at higher risk for human trafficking or to countries that are inconsistent with the customer’s expected activity.</td>
<td>Banks/Credit Unions, Money Transmitters</td>
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<tr>
<td>Frequent transactions, inconsistent with expected activity and/or line of business, carried out by a business customer in apparent efforts to provide sustenance to individuals (e.g., payment for housing, lodging, regular vehicle rentals, purchases of large amounts of food).</td>
<td>Banks/Credit Unions, Money Transmitters, Prepaid Card Provider</td>
</tr>
<tr>
<td>Payments to employment or student recruitment agencies that are not licensed/registered or that have labor violations.</td>
<td>Banks/Credit Unions, Money Transmitters, Prepaid Card Provider, Check Cashers</td>
</tr>
<tr>
<td>Unexplained/unjustified lifestyle incommensurate with employment or business line. Profits/deposits significantly greater than that of peers in similar professions/business lines.</td>
<td>Banks/Credit Unions, Casinos/Money Transmitters, Check Cashers, Prepaid Card Provider</td>
</tr>
<tr>
<td>Inflows are largely received in cash where substantial cash receipts are inconsistent with the customer’s line of business. Extensive use of cash to purchase assets and to conduct transactions.</td>
<td>Banks/Credit Unions, Money Transmitters, Check Cashers</td>
</tr>
</tbody>
</table>

### Exploitation Stage

<table>
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<tr>
<th>Who Could Detect</th>
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<tbody>
<tr>
<td>Exploitation Stage</td>
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<tr>
<td>A business customer does not exhibit normal payroll expenditures (e.g., wages, payroll taxes, social security contributions). Payroll costs can be non-existent or extremely low for the size of the customer’s alleged operations, workforce and/or business line/model.</td>
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<tr>
<td>Substantial deductions from employee wages for housing, food, etc.</td>
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<tr>
<td>Large portions of payroll checks are deposited back into the employer’s account. This activity may be detected by those financial institutions that have access to paystubs and other payroll records.</td>
</tr>
<tr>
<td>A customer’s account appears to function as a funnel account, where cash deposits occur in cities/states where the customer does not reside or conduct business and the deposits are quickly withdrawn.</td>
</tr>
<tr>
<td>Multiple, apparently unrelated, customers sending wire transfers to the same beneficiary, at times from a common address and phone number.</td>
</tr>
<tr>
<td>Transactions conducted by individuals, escorted by a third party (e.g., under the pretext of requiring an interpreter), to transfer funds (that may seem to be their salaries) to other countries. The third party escorting the customer may always have possession of the customer’s ID.</td>
</tr>
<tr>
<td>Frequent payments to online escort services for advertising, including small posting fees to companies of online classifieds as well as more expensive, higher-end advertising and website hosting companies.</td>
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<td>Common signer(s)/custodian(s) in apparently unrelated business and/or personal accounts. Similarly, common information (e.g., address, phone number, employment information) used to open multiple accounts in different names.</td>
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<tr>
<td>Accounts of foreign workers or students where the employer or employment agency services as a custodian.</td>
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</table>
Homelessness

In the survey of survivors in the Polaris report 64% of the respondents recounted being homeless or experiencing unstable housing when they were recruited into their situation. Polaris states this is likely an extremely underreported type of trafficking. Self-identification is a challenge in any trafficking case but likely even more so with individuals who are trading sex for basic needs. Most often, these individuals do not see themselves as victims, or see what they are doing as commercial sex, but simply as doing what they need to do in order to survive. This can even be the case if elements of trafficking are present, such as when people are forced to sell drugs as a condition of housing.

Housing Abuses with Seasonal Laborers

Some employers, who coerce seasonal visa holders, house the workers on their own properties. Others may rent short term leases on apartments or townhomes instead. According to National Hotline accounts, it is all too common for seasonal workers to be housed in a single, overcrowded dwelling. Many workers reported not having their own bed, a lack of food storage space, broken plumbing or appliances caused by overuse, and not being able to shower due to the sheer number of occupants living in the space. This a violation of the workers’ health and safety (and likely their visa contract). It could also be a serious fire code violation, as well as an infraction of the occupancy expectations outlined in most standard rental agreements.

Use of Shelters, Hotels & Other Housing

Polaris reported that 64% of survivor respondents said they had been homeless or experiencing unstable housing when they were recruited into their situation. Traffickers offer safe shelter as a coercive recruitment tactic and later threaten homelessness as a means of control. Already struggling with fewer resources, employment opportunities, or social supports, as well as increased rates of discrimination, LGBTQ+ homeless youth are 3-7 times more likely to enter the street economy and engage in survival sex to meet basic needs over their non-LGBTQ+ homeless peers.

In cases where homeless shelters, domestic violence shelters, runaway/homeless youth shelters, and group homes are not in a confidential location, traffickers often utilize these sites as a recruitment base. They do so indirectly by having other young victims approach and befriend persons residing in temporary shelters to lure them back into an abusive connection to the trafficker through promises of better and freer conditions not found in the shelter they are currently in. Traffickers often oversee residential brothel networks. They rent multiple housing units, supervise victims and buyers at these units, transport victims between units, advertise to buyers, and facilitate money movement. In some situations, residential brothel operators ‘contract out’ the recruitment, rotation, and control of victims to individual traffickers, while personally managing leases, supplying the brothels, and coordinating with buyers.

Traveling sales crews are a type of labor trafficking business model that often utilizes vacation rentals set up through Airbnb in place of hotels, as these options can often house far more people at a time for less than it would cost to rent multiple hotel rooms. Vacation rentals are likely to receive less intense scrutiny by on-site owners or law enforcement.

The Polaris survey reported that 75% of survivors came into contact with hotels at some point during their trafficking situation. This means traffickers are taking advantage of unwitting hotel franchises and relying on them to help facilitate their illicit businesses. Contrary to popular misconception, trafficking does not only take place in cheap hotels or motels with sub-par accommodations. Instead, traffickers running hotel-based escort businesses look for a range of factors including convenient locations; buyer comfort; price; hotel policies, procedures, and infrastructure; and whether the hotel is monitored by law enforcement. As a result, trafficking may often occur at hotel chain franchises that offer a good balance of quality and price while giving buyers a sense of anonymity and safety.

Red flags include:
• Payments made in cash or with prepaid credit card;
• Initially reserve for one night, but then extend stays day by day;
• Request rooms overlooking parking lot or not within view of front desk;
• Extended stays with few possessions;
• Excessive foot traffic in/out of rooms;
• Presence of excessive drugs, sex paraphernalia;
• Frequently requires new towels, washcloths, and/or linens.
Shelters as Advocates

Housing and shelter requests are by far the most needed service for potential trafficking victims on the National Hotline, but in many cases are the most difficult to fulfill. Since December 2007, housing needs have made up 37% of all referral and crisis assistance requests to the Hotline.

The Polaris Report urged Congress and local governments to consider passing new legislation and expanding funding streams in existing policies that would subsidize and promote the creation of available housing, both for government housing, and in grants for private shelters.

With more available and affordable housing, especially for vulnerable populations who may be susceptible to being trafficked, traffickers will be less successful in luring people into human trafficking situations with their offer of housing.

Housing & Hotels as Advocates

The fact that potential traffickers often rent the residential properties needed for their operations means that property owners, landlords, and management companies are often in a key position to help both identify potential victims and disrupt operations. Indeed, the Polaris survivor survey found that 56% of survivors had contact with a landlord or rental office during their trafficking, though it is unclear whether the actual commercial sex or labor was occurring at the residence.

The greatest potential of residential management companies and landlord identification lies within formal residential brothels. In some cases, they are actually on site and can see what is going on within these properties. In others, they are in a position to compare and draw conclusions from complaints by neighbors who likely have noticed suspicious activity. However, reports to the National Hotline from rental managers are relatively infrequent, and neighbors describing potential residential brothels often note that they have reported these indicators to their landlord or property management company, but have received no response to their report.

Rental management companies, apartment and townhouse complexes, and individual landlords should commit to receiving comprehensive training to help them understand and detect possible human trafficking.

Furthermore, real estate owners should require management companies they contract with to undergo training as a condition of their business. Rental management companies could be on the front lines to detect trafficking in residential brothels, domestic work, pornography, remote interactive sexual acts (a.k.a. ‘webcam houses’), personal sexual servitude, and a whole host of labor trafficking types where multiple victims may be housed together such as in agriculture, nail salons, factories, and restaurants.

Rental management companies should also do their due diligence to make sure their vendors, especially those providing landscaping and commercial cleaning services, are adhering to ethical workplace practices.

Financial Institutions Work to Spot Traffickers

Financial institutions have done significant research and analysis to understand trafficking operations and design systems that can detect potential financial indicators of trafficking. In 2014, the Financial Crimes Enforcement Network (FinCEN) issued an advisory that included a list of potential indicators of trafficking (https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2014-a008). Following the release of this advisory, suspicious activity reports (SAR’s) related to human trafficking increased by 900%. Many major financial institutions have committed significant energy to refining and expanding on these indicators in an attempt to ensure such reports are useful in investigations, particularly those related to sex trafficking.

Given the huge variety of how trafficking situations occur and how traffickers adapt their operations over time, developing systems tailored to reflect the nuances of each type of trafficking is extremely challenging. The financial services industry should be applauded for its innovative efforts to meet this challenge.
Hospitals Code for Trafficked Victims

In June 2018 the National Center for Health Statistics (NCHS) at the Centers for Disease Control and Prevention (CDC) added new data collection fields on human trafficking for federal fiscal year 2019, among the 279 new codes, 143 revised codes, and 51 deactivated codes. These 2019 ICD-10-CM codes are to be used for discharges and patient encounters occurring from October 1, 2018 through September 30, 2019. Health care providers and hospitals who are seeing an increase in human trafficking cases now have ICD-10-CM codes to adequately differentiate victims of human trafficking from other abuse victims. The Office on Trafficking in Persons and the HHS Office on Women’s Health consulted with the CDC and health care provider stakeholders (e.g., American Hospital Association, HEAL Trafficking, International Center for Missing and Exploited Children) on strengthening data collection on human trafficking within health care settings. The CDC added new T codes to report for cases of suspected and confirmed forced labor and sexual exploitation and Z codes for the examination and observation of victims of human trafficking. The 2019 Addenda to the ICD-10-CM List of Diseases and Injuries included: Under Adult and child abuse, neglect and other maltreatment, confirmed:
• T74.6 – Forced labor exploitation, confirmed
• T74.61 – Adult forced labor exploitation, confirmed
• T74.62 – Child forced labor exploitation, confirmed
Under Adult and child abuse, neglect and other maltreatment, suspected:
• T76.5 – Forced sexual exploitation, suspected
• T76.51 – Adult forced sexual exploitation, suspected
• T76.52 – Child sexual exploitation, suspected
• T76.6 – Forced labor exploitation, suspected
• T76.61 – Adult forced labor exploitation, suspected
• T76.62 – Child forced labor exploitation, suspected
Under Encounter for examination and observation for other reasons:
• Z04.81 - Encounter for examination and observation of victim following forced sexual exploitation
• Z04.82 - Encounter for examination and observation of victim following forced labor exploitation
Under Problems related to upbringing -Personal history of abuse in childhood:
• Z62.813 - Personal history of forced labor or sexual exploitation in childhood
Under Personal risk factors, not elsewhere classified: Personal history of psychological trauma, not elsewhere classified:
• Z91.42 - Personal history of forced labor or sexual exploitation
CDC NCHS is responsible for the use of the International Statistical Classification of Diseases and Related Health Problems, 10th revision (ICD-10) in the United States. ICD-10 is copyrighted by the World Health Organization (WHO), which owns and publishes the classification. WHO has authorized the development of an adaptation of ICD-10 for use in the United States for U.S. government purposes. ICD-10-CM was developed following a thorough evaluation by a public health approach recognizes that victims of trafficking intersect with multiple systems of care, including health and human services, educational settings, and community and faith-based organizations that can provide assistance to victims and their families. A public health approach also emphasizes screening to prevent potential trafficking victimization or re-victimization, especially for individuals who are at disproportionate risk of human trafficking. The Adult Human Trafficking Screening Tool (AHTST) is designed for use across the various behavioral health, health care, social service and public health settings. The Toolkit provides a screening tool to use in identifying adults who you suspect may have experienced sex or labor trafficking. While this tool is not yet validated, it has been developed based on the latest research and best practices in screening. The goals of this Toolkit are to help you:
• Recognize the emotional, behavioral, and physical signs of trafficking (commonly known as “red flags”);
• Respond appropriately and sensitively through screening to assess the particular needs of your client or patient;
• Make appropriate referrals for services.
This Toolkit also provides ways in which you can use a conversational screening session to effectively identify people who may have been trafficked and those vulnerable to trafficking. To effectively use this tool, professionals in these areas should receive the education and training necessary to consistently recognize signs and
Codes cont. from pg. 7

Technical Advisory Panel and extensive additional consultation with physician groups, clinical coders, and others to assure clinical accuracy and utility. The specific improvements reflected in ICD-10 include the additional of information relevant to ambulatory and managed care encounters, expanded injury codes, the creation of combination diagnosis/symptom codes to reduce the number of codes needed to fully describe a condition, and greater specificity in code assignment. (https://www.acf.hhs.gov/otip/news/icd-10) (https://www.chausa.org/publications/toolkit)

Toolkit cont. from pg. 7

symptoms of adults with a history of or vulnerability to trafficking. This Toolkit includes:
• Elements of a trauma-informed screening tool;
• Considerations for administering the tool;
• Agency practices to be implemented before use of the screening tool;
• Ethical and safety considerations;
• Steps toward appropriate and meaningful referrals.

The AHTST was designed for use by behavioral health, health care, social work, and public health professionals. Contact NHTTAC to receive training to effectively use this toolkit at info@nhttac.org.

You may access the toolkit at: https://www.acf.hhs.gov/sites/default/files/otip/adult_human_trafficking_screening_tool_and_guide.pdf

Article explaining CHI's Approach

General Education Resources:

‘Human Trafficking: Understanding a Complex Issue’
A 10-minute PowerPoint explaining human trafficking and the role of health care professionals.
https://www.youtube.com/watch?v=jyOCMc4wjqo

For health care providers:
‘Addressing Human Trafficking in the Health Care Setting’ is a 25-minute training course.

Further resources:

Hospital Networking

Founded in 2013, HEAL Trafficking (Health, Education, Advocacy, Linkage) united over 2,000 professionals, who are fighting human trafficking from a public health perspective. Their vision is 'to see a world healed of trafficking because trafficking is a public health issue'. The non-profit HEAL Trafficking website offers open access resources for health professionals and health systems, including a human trafficking protocol toolkit developed in 2017. It can be accessed at:

Dignity Health, headquartered in San Francisco and serving throughout CA, AZ and NV, developed the Human Trafficking Medical Safe Haven at Mercy Family Health Center in Sacramento, through the initiative of Dr. Ron Chambers. This site provides trauma-informed, patient-centered care to trafficked persons, thanks to extensive training of its hospital staff. Dignity Health plans to eventually scale this model across all its facilities.

Stop Trafficking! is dedicated exclusively to fostering an exchange of information among USCSAHT members, organizations and concerned persons, collaborating to eliminate all forms of human trafficking.
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