



# **U.S. Department of Labor's Effort to End Labor Trafficking National Online Dialogue**

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**December 3 –18, 2020  
Summary Report**



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## Introduction

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### **Background**

From December 3 to 18, 2020, the U.S. Department of Labor (USDOL) hosted the *USDOL's Efforts to End Labor Trafficking National Online Dialogue* in support of the government-wide effort to prevent human trafficking and prioritize resources to vigorously prosecute offenders, assist victims, and provide prevention education. USDOL combats labor trafficking through its investigative role in the enforcement of federal labor laws, funding of international grants to research and monitor labor trafficking, and its employment and training programs, among other efforts. The result of the *USDOL's Efforts to End Labor Trafficking National Online Dialogue* will be used to help different agencies within USDOL develop and enhance resources that address labor trafficking, as well as determine how to increase engagement with workers, advocates, and other stakeholder groups.

Six agencies within USDOL collaborated to develop and support this important national discussion. These included the Office of Compliance Initiatives (OCI), the Bureau of International Labor Affairs (ILAB), the Employment and Training Administration (ETA), the Occupational Safety and Health Administration (OSHA), the Office of Disability Employment Policy (ODEP), the Wage and Hour Division (WHD), and the Centers for Faith and Opportunity Initiatives (CFOI). Representatives from each agency promoted the dialogue to their constituents and served as moderators by reviewing and responding to participant ideas and comments.

This national online dialogue provided an innovative opportunity for advocacy groups, researchers, employers and business organizations, employees and employee groups, state and local government officials, and other stakeholders and subject matter experts to play a key role in informing USDOL's efforts to educate employers and workers about how to prevent and end labor trafficking.

During the 15-day national online dialogue, 262 stakeholders shared ideas on the following topics: (1) ODEP's work supporting survivors on the job; (2) ILAB's Comply Chain App; (3) WHD ensuring proper wages on the workplace; (4) OSHA worker rights and protections; (5) ETA and state efforts to educate farmworkers and agricultural employers; and (6) CFOI supports for faith-based organizations to help end labor trafficking.

In conjunction with the dialogue, OCI hosted the *USDOL's Efforts to End Labor Trafficking @ePolicyWorks* Twitter chat. The @ePolicyWorks Twitter chat focused on the best practices and efforts of governmental and non-governmental organizations to address labor trafficking and offer support to employers and workers. The chat featured guests from the DirectEmployers Association, the National Disability Rights Network, Karana Rising, and the Human Trafficking Legal Center. In addition, the U.S. Department of Justice's Human Trafficking Prosecution Unit contributed resources and comments that were shared via @ePolicyWorks during the chat.

## **Online Dialogue Topics**

The *USDOL's Efforts to End Labor Trafficking National Online Dialogue* contained six different campaigns. Each campaign was associated with one of the participating agencies. Every agency was responsible for providing the content for their campaign and moderating their campaign activity throughout the dialogue.

### **1. ODEP's Work Supporting Survivors on the Job**

Under this campaign, ODEP asked visitors to submit ideas and comments about how to address the common challenges that human trafficking survivors face once they return to work. They also asked for input on how to identify that a human trafficking survivor is struggling on the job and share ideas and comments on how ODEP can work with employers to create an environment where survivors feel comfortable requesting needed accommodations.

### **2. ILAB's Comply Chain App**

Under this campaign, ILAB asked stakeholders to share their thoughts on how to improve USDOL's Comply Chain App to better address the needs of businesses in identifying labor trafficking abuses in their supply chain. They asked visitors to specify how the Comply Chain app aligns with the best practices from their industry.

### **3. WHD Ensuring Proper Wages in the Workplace**

Under this campaign, WHD asked dialogue visitors to share ideas about how the agency can better engage with federal, state, and local governments, as well as non-governmental organizations, to serve workers in industries where labor trafficking occurs, including what types of materials they should distribute to workers. They also asked for guidance on how WHD can better work with criminal law enforcement to ensure stronger enforcement of anti-labor trafficking laws and restitution to workers that may be victims of labor exploitation.

### **4. OSHA's Worker Rights and Protections**

Under this campaign, OSHA asked visitors to weigh in on whether OSHA needs to produce worker rights educational materials in additional languages. They also asked what approaches the agency should consider in its efforts to reach vulnerable workers. Additionally, they asked for ideas on how inspectors can ensure all workers are comfortable providing information related to trafficking or other workplace hazards.

### **5. ETA and State Efforts to Educate Farmworkers and Ag Employers**

Under this campaign, ETA asked stakeholders for innovative ideas on how ETA and State Workforce Agencies (SWAs) can educate farmworkers and agricultural employers on what constitutes labor trafficking. ETA and SWAs also sought ideas on how to educate farmworkers about their labor rights and the resources available to them.

## **6. CFOI Supports Faith-Based Organizations to Help End Labor Trafficking**

Under this campaign, CFOI asked stakeholders how faith-based organizations could help victims of labor trafficking. In addition, CFOI was looking for ideas on how the agency could best help improve or expand faith-based organization efforts to combat forced labor and human trafficking, including addressing barriers, if any, faith-based organizations face when working to combat labor and human trafficking.

## **Outreach Efforts**

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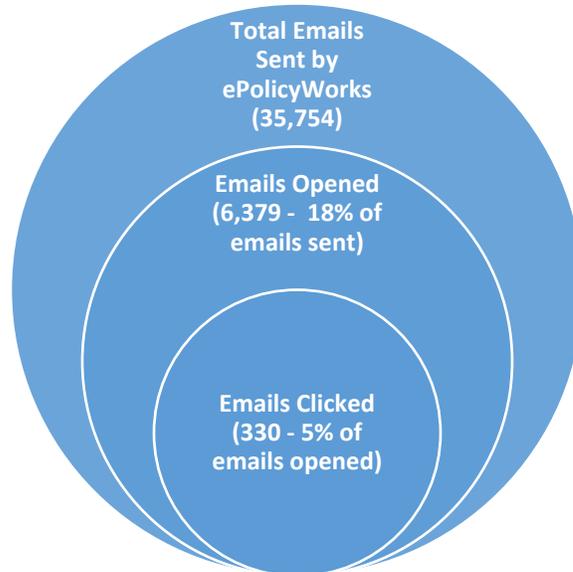
The *USDOL's Efforts to End Labor Trafficking National Online Dialogue* asked employers, workers, state and local government officials, advocacy groups, and other stakeholders to share their ideas and take part in the important discussion on efforts to end labor trafficking. To ensure a wide range of participants, ePolicyWorks conducted numerous strategic outreach efforts, including distributing targeted eblasts, posting on social media, and hosting a Twitter chat. ePolicyWorks sent emails to the registrants of previous ePolicyWorks online dialogues, as well as agriculture advocacy organizations, labor trafficking advocacy groups, faith-based organizations, organizations that represent employers and workers, state and local government officials, and other key stakeholders, including members of the disability community.

### **ePolicyWorks Email and Social Media Outreach**

ePolicyWorks conducted eleven distinct email campaigns over the course of the dialogue. The emails included the following:

1. General dialogue launch announcement email
2. Targeted ODEP Campaign invitation email (to disability groups)
3. Targeted ILAB Campaign invitation email (to business organizations)
4. Targeted CFOI Campaign invitation email (to faith-based organizations)
5. Targeted ETA Campaign email (to agricultural organizations)
6. Targeted Advocacy email (to labor trafficking advocacy groups)
7. General dialogue last chance email
8. General Twitter Chat announcement email
9. General dialogue extended email with Twitter Chat information
10. Targeted last chance email (to dialogue registrants)
11. General dialogue last day email

- Total Emails Delivered: 35,754
- Total Emails Opened: 6,379
- Total number of clicks on links in emails (excluding multiple clicks of the same link): 330



In addition to the email campaigns ePolicyWorks posted tweets on @ePolicyWorks throughout the dialogue, including before and after the December 15, 2020, #EPWChat Twitter chat.

- Number of @ePolicyWorks impressions of online dialogue promotions: 4,350 (from 18 online dialogue promotion tweets)

### **Independent Online Dialogue and Twitter Chat Promotion**

Over the course of the online dialogue, many organizations promoted the online dialogue and Twitter chat through Facebook, LinkedIn, Twitter, emails, blogs, newsletters, and action alerts. Below is a sampling of the organizations that published details regarding the online events:

- |                                                   |                                                                             |
|---------------------------------------------------|-----------------------------------------------------------------------------|
| • Alliance to End Slavery and Trafficking (ATEST) | • Farmworker and Landscaper Advocacy Project                                |
| • AskEARN                                         | • Freedom2Care                                                              |
| • Association on Higher Education and Disability  | • Intercessors for America                                                  |
| • Broken Wings                                    | • Job Accommodation Network                                                 |
| • Campaign for Disability Employment              | • Maryland DORS                                                             |
| • Chicago General Defense Committee               | • Office of Rural and Farmworker Housing                                    |
| • DirectEmployers Association                     | • Trinity Baptist Church                                                    |
| • Facility Safety Management Newsletter           | • PWA Insurance Services                                                    |
| • The Fair Pay Project                            | • The Voluntary Protection Programs Participants' Association, Inc. (VPPPA) |

## Twitter Chat on USDOL's Effort to End Labor Trafficking National Online Dialogue

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### **Twitter Chat Overview**

OCI, in partnership with ODEP, hosted an @ePolicyWorks Twitter chat on December 15, 2020, about how USDOL agencies can work to end labor trafficking. It was held in conjunction with the *USDOL's Efforts to End Labor Trafficking National Online Dialogue*.

Featured guests for the chat included Shannon Offord, Vice President of Strategic Partnerships and Alliances at DirectEmployers; David Hutt, Deputy Executive Director of Legal Services at the National Disability Rights Network; Andrea Powell, Founder & President of Karana Rising; and Sarah Bessell, Deputy Director at the Human Trafficking Legal Center. Sean Tepfer, National Program Manager, at the U.S. Justice Department's Human Trafficking Prosecution Unit contributed additional resources that were shared via ePolicyWorks during the chat.

On December 15, for one hour, Twitter individuals took part in a real-time, interactive discussion to raise awareness with employers about labor trafficking and understand their legal responsibilities; educate workers, particularly those in the agricultural sector, about their rights in the workplace; consider methods and resources USDOL should use to reach workers and employers with information about labor trafficking; recognize the challenges survivors, including those with disabilities face when returning to the workforce; and understand the role faith-based organizations play in identifying labor trafficking and helping victims.

This chat enhanced the conversation occurring in the *USDOL's Efforts to End Labor Trafficking National Online Dialogue*. Information provided by those participating in the twitter chat will inform USDOL's efforts to end labor trafficking from the perspective of organizations that are steeped in combating trafficking and communicating with employers and people with disabilities.

Please find a compilation of all tweets from the Twitter chat at <https://wke.lt/w/s/MTJIfC> (open in Chrome).

[Appendix A](#) of this document includes the list of resources shared during the chat.

### **Twitter Chat Metrics**

The following metrics reflect engagement and activity in the Twitter chat:

- Total promotional tweets prior to the chat from ePolicyWorks: 6
- Total impressions on promotional tweets prior to the chat: 15,761
- Total promotional tweets prior to the chat from other agencies and organizations: 16

- Number of tweets posted with the #EPWChat during chat: (including tweets from ePolicyWorks): 190 (plus an additional 21 posts before the chat began and 3 posts after the chat was concluded)
- Number of impressions received on tweets sent by ePolicyWorks during the chat (total number of views): 47,173
- Number of engagements received on tweets sent by ePolicyWorks during the chat (clicks anywhere on the tweet, including retweets, replies, follows, likes, links, hashtags, embedded media, username, profile photo, or tweet expansion): 1,081
- Number of active tweeters (those who posted at least once, including hosts) during chat: 12
- Number of resources shared during the chat: 26 (see Appendix A)

### **Key Stakeholder Groups**

Key stakeholder groups participated in the chat, sharing ideas, resources, and links. These stakeholders, among which are the featured guests, include:

- @DirectEmployer
- @NDRNadvocates
- @HTLegalCenter
- @TheJusticeDept
- @Karana\_Rising
- @Polaris\_Project

### **Key Themes from Twitter Chat**

During the hour-long *USDOL's Efforts to End Labor Trafficking Twitter Chat*, individuals shared ideas for how advocacy groups and nonprofits can work with USDOL to end labor trafficking. The wealth of information tweeted and retweeted during the Twitter chat will not only assist USDOL in its mission but also will serve as a resource for employees, employers, organizations, and individual stakeholders. Based on the tweets during the Twitter chat, several themes emerged, including the following:

- The importance that employers understand the laws around labor trafficking. The chat participants shared numerous existing federal, state, and local resources that can help inform employers.
- The need for businesses to investigate their supply chain to ensure they are not unknowingly supporting labor trafficking. Again, chat participants shared suggested resources including ILAB's Comply Chain App.
- Employers should be looking for signs of labor trafficking when hiring, including when using recruiters.

- USDOL anti-trafficking materials should be accessible to all, including those with disabilities.
- There are several nonprofits and advocacy organizations working to reach frontline workers in the U.S. and abroad to ensure they understand their rights and know where to go to get assistance.
- Support for survivors is needed once they return to the workplace.

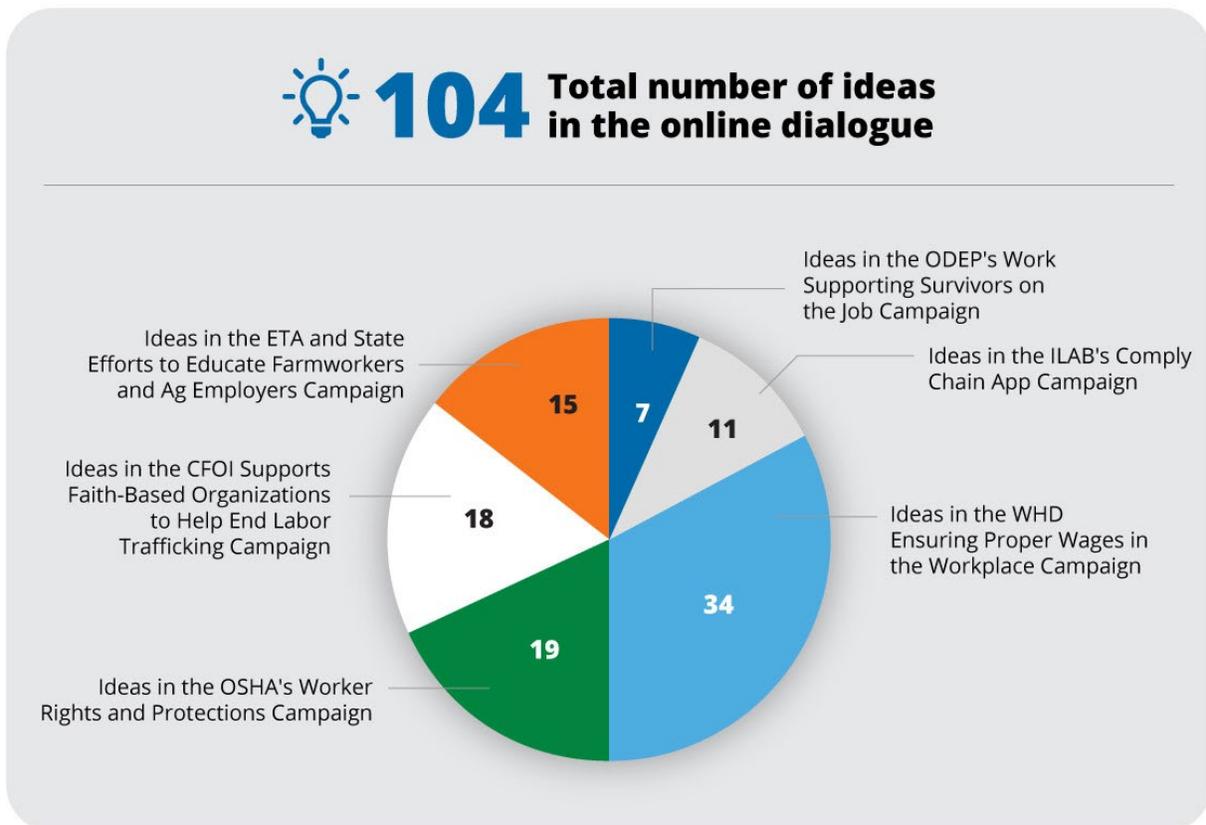
### **Twitter Chat Results**

The multitude of ideas gathered from both the online dialogue and Twitter chat illustrate that collaboration and crowdsourcing are useful as part of the discussion around how USDOL can end labor trafficking and best support employers, workers, families, and members of vulnerable populations. USDOL will use the ideas and comments gathered from these two online events to guide both outreach activities and development of important resources.

## Online Dialogue Participant Summary

The *USDOL's Efforts to End Labor Trafficking National Online Dialogue* opened on December 3, 2020 and closed at the end-of-day on December 18, 2020. Detailed below is the information on the contributions to the dialogue – ideas, comments, and votes, along with the number of online dialogue views, registrants, participation rates, location of registrants, and profile information provided by registrants during the registration process.

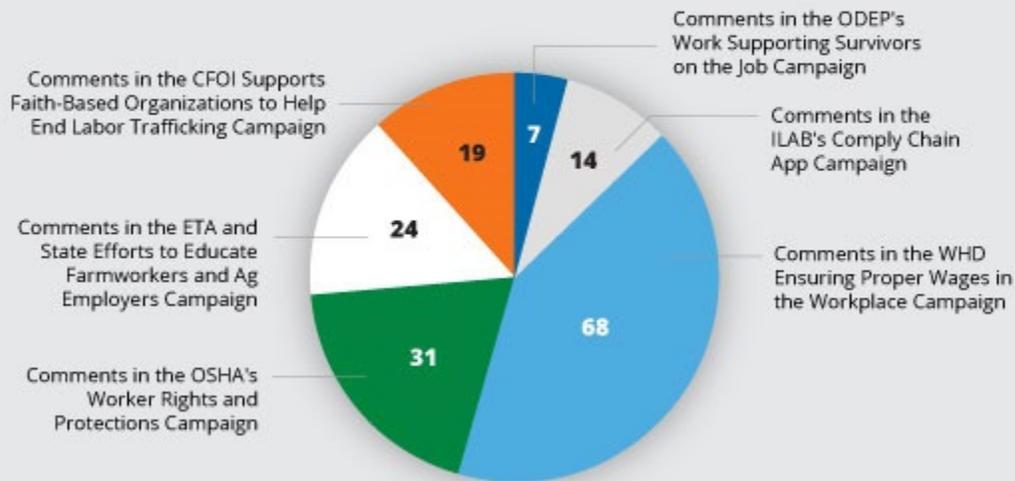
### Contributions to the Online Dialogue



#### Total number of ideas in the online dialogue: 104

- Ideas in the ODEP's Work Supporting Survivors on the Job Campaign: 7
- Ideas in the ILAB's Comply Chain App Campaign: 11
- Ideas in the WHD Ensuring Proper Wages in the Workplace Campaign: 34
- Ideas in the OSHA's Worker Rights and Protections Campaign: 19
- Ideas in the ETA and State Efforts to Educate Farmworkers and Ag Employers Campaign: 18
- Ideas in the CFOI Supports Faith-Based Organizations to Help End Labor Trafficking Campaign: 15

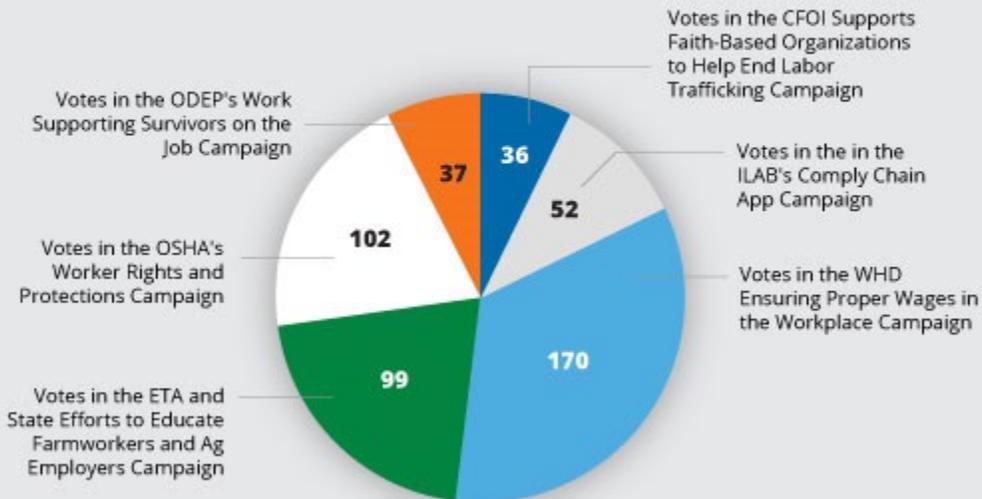
 **163** Total number of comments in the online dialogue



**Total number of comments in the online dialogue: 163**

- Comments in the ODEP's Work Supporting Survivors on the Job Campaign: 7
- Comments in the ILAB's Comply Chain App Campaign: 14
- Comments in the WHD Ensuring Proper Wages in the Workplace Campaign: 68
- Comments in the OSHA's Worker Rights and Protections Campaign: 31
- Comments in the ETA and State Efforts to Educate Farmworkers and Ag Employers Campaign: 24
- Comments in the CFOI Supports Faith-Based Organizations to Help End Labor Trafficking Campaign: 19

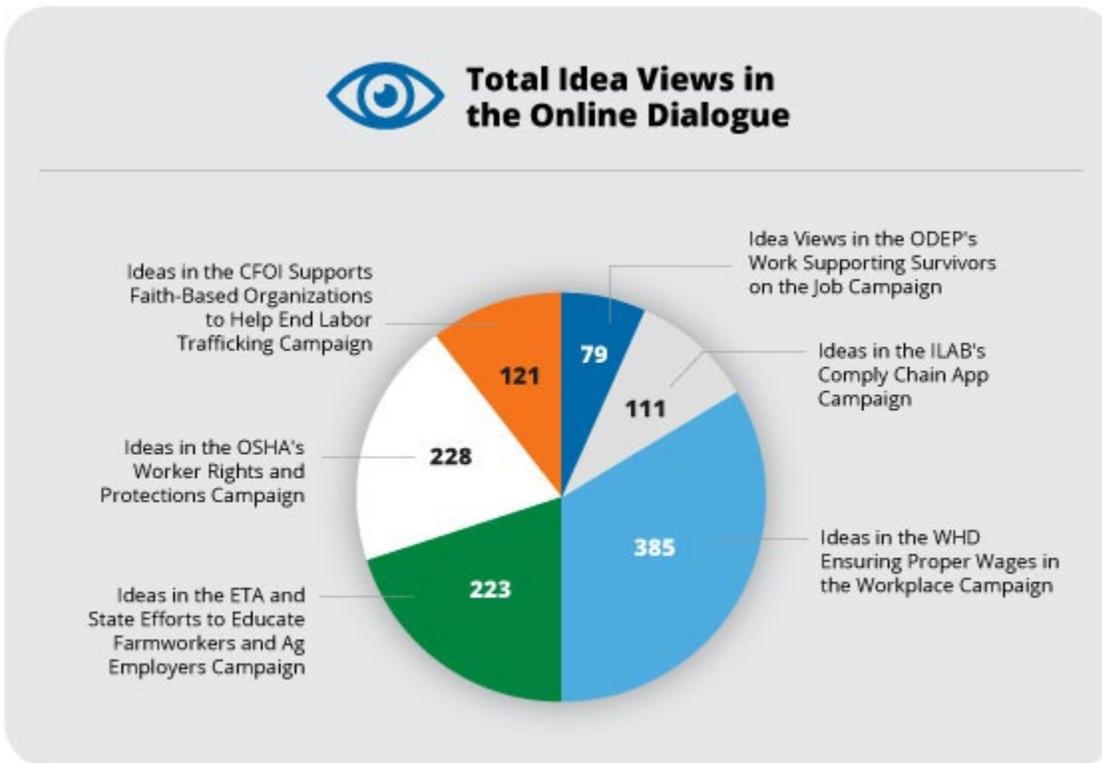
 **496 Total number of votes in the online dialogue**



**Total number of votes in the online dialogue: 496**

- Votes in the ODEP's Work Supporting Survivors on the Job Campaign: 37
- Votes in the in the ILAB's Comply Chain App Campaign: 52
- Votes in the WHD Ensuring Proper Wages in the Workplace Campaign: 170
- Votes in the OSHA's Worker Rights and Protections Campaign: 102
- Votes in the ETA and State Efforts to Educate Farmworkers and Ag Employers Campaign: 99
- Votes in the CFOI Supports Faith-Based Organizations to Help End Labor Trafficking Campaign: 36

## Idea Views in the Online Dialogue\*



- Idea Views in the ODEP's Work Supporting Survivors on the Job Campaign: 79
- Ideas in the ILAB's Comply Chain App Campaign: 111
- Ideas in the WHD Ensuring Proper Wages in the Workplace Campaign: 385
- Ideas in the OSHA's Worker Rights and Protections Campaign: 228
- Ideas in the ETA and State Efforts to Educate Farmworkers and Ag Employers Campaign: 223
- Ideas in the CFOI Supports Faith-Based Organizations to Help End Labor Trafficking Campaign: 121

*\*Idea Views include the number of times a verified registered member of the dialogue opened the idea detail page to view the full description of an idea.*

## **Registrant in the Online Dialogue**

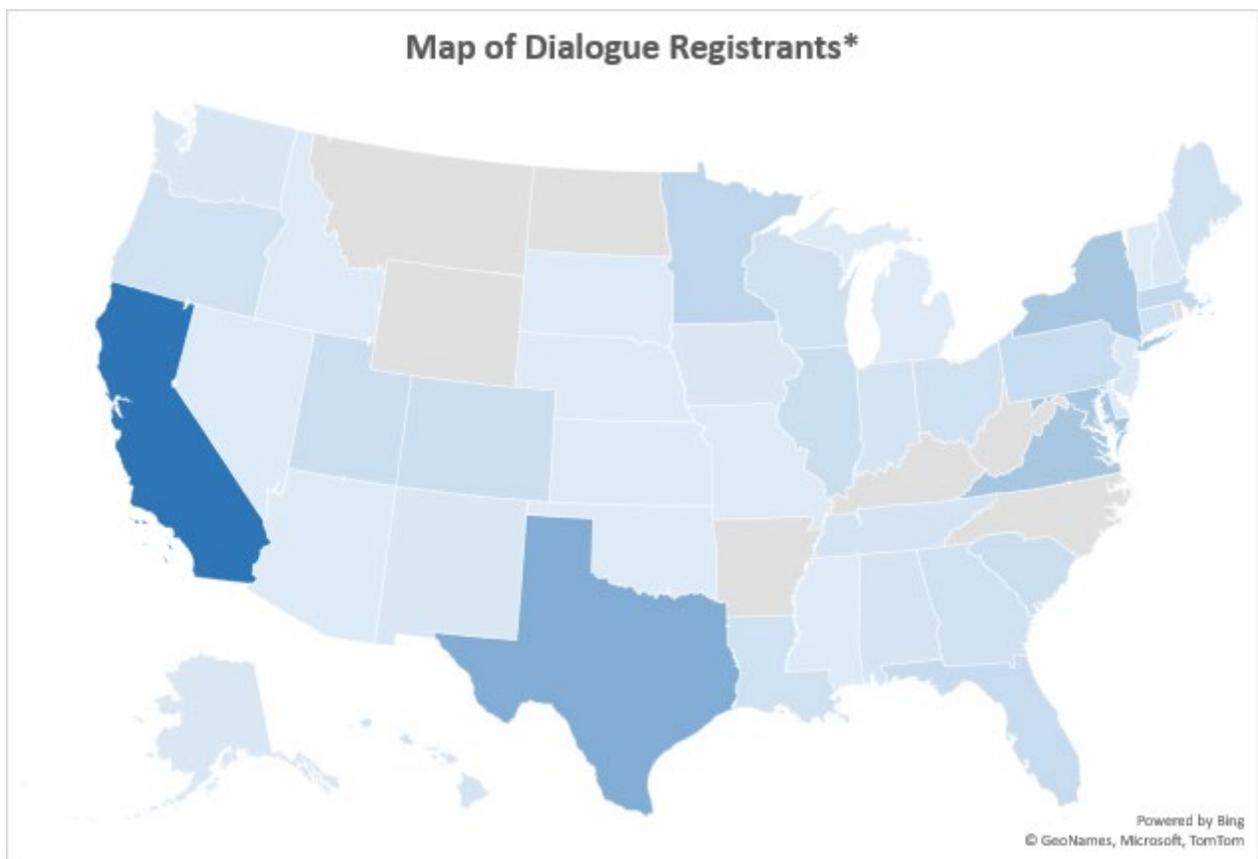
- Total number of registrants in the dialogue: 265
- Total number of registrants who completed all the member profile questions: 244 (92% of registrants)
- Total number of registrants who participated\*: 104 (39% of registrants)
- Total number of registrants who contributed ideas: 58
- Total number of registrants who contributed comments: 35
- Total number of registrants who contributed votes: 69
- Total number of states represented: 43 (83%)
- Total number of industries represented: 18 (including federal, state, and local government officials)

*\*Participation" includes submitting ideas, comments, or votes to the dialogue's online platform.*

## **Self-Reported State Affiliation of Online Dialogue Registrants**

<b><u>State</u></b>	<b><u>Total Number of Registrants</u></b>	<b><u>Percentage of Total</u></b>
California	41	16.80%
District of Columbia	24	9.84%
Texas	22	9.02%
New York	13	5.33%
Maryland	13	5.33%
Virginia	13	5.33%
Minnesota	8	3.28%
Massachusetts	7	2.87%
Florida	6	2.46%
Pennsylvania	6	2.46%
Illinois	5	2.05%
Colorado	5	2.05%
South Carolina	5	2.05%
Utah	5	2.05%
Ohio	4	1.64%
Georgia	4	1.64%
Connecticut	4	1.64%
Wisconsin	4	1.64%
Oregon	4	1.64%
Maine	4	1.64%
Louisiana	4	1.64%
Tennessee	3	1.23%
Indiana	3	1.23%
Alabama	3	1.23%
Hawaii	3	1.23%
New Jersey	2	0.82%
Washington	2	0.82%
Iowa	2	0.82%
New Mexico	2	0.82%
New Hampshire	2	0.82%
Alaska	2	0.82%
Michigan	1	0.41%
Arizona	1	0.41%
Nevada	1	0.41%
Nebraska	1	0.41%
Kansas	1	0.41%
Oklahoma	1	0.41%
Delaware	1	0.41%

<b>State</b>	<b>Total Number of Registrants</b>	<b>Percentage of Total</b>
Mississippi	1	0.41%
Vermont	1	0.41%
South Dakota	1	0.41%
Idaho	1	0.41%
Missouri	1	0.41%
Other	7	2.87%

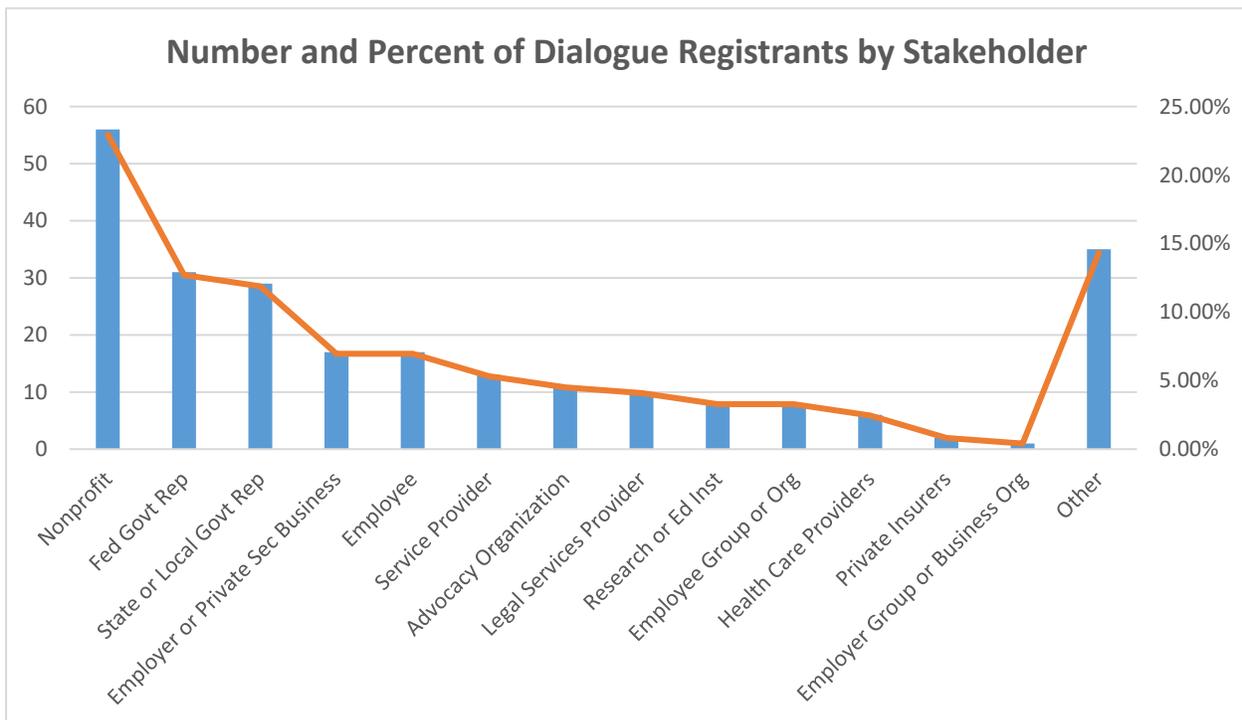


*\* Map depicts Self-Reported State Affiliation of Online Dialogue Registrants as reported in the table in the section above.*

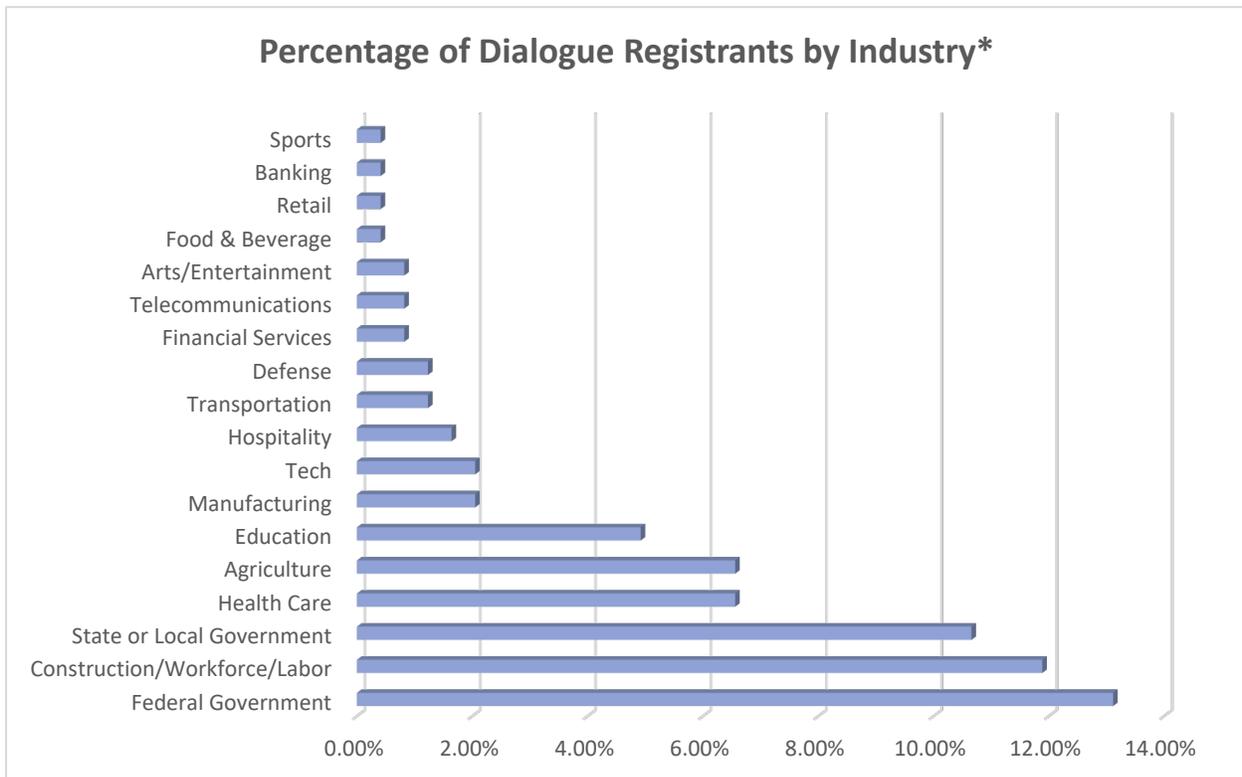
## Online Dialogue Registrant Profiles

When registering for the *USDOL's Efforts to End Labor Trafficking National Online Dialogue*, in addition to identifying their state affiliation, registrants were asked to select the stakeholder group they represented and their industry. The choices were predetermined for this question and registrants were allowed to choose only one answer. Below is a summary of the responses:

<b>Stakeholder Group</b>	<b>Total Number of Registrants</b>	<b>Percentage of Total</b>
Nonprofit	56	22.95%
Federal Government Representative	31	12.70%
State or Local Government Representatives	29	11.89%
Employer or Private Sector Business	17	6.97%
Employee	17	6.97%
Service Provider	13	5.33%
Advocacy Organization	11	4.51%
Legal Services Provider	10	4.10%
Research or Educational Institution	8	3.28%
Employee Group or Organization	8	3.28%
Health Care Providers	6	2.46%
Private Insurers	2	0.82%
Employer Group or Business Organization	1	0.41%
Other	35	14.34%



<b>Industry Group</b>	<b>Total Number of Registrants</b>	<b>Percentage of Total</b>
Federal Government	32	13.11%
Construction/Workforce/Labor	29	11.89%
State or Local Government	26	10.66%
Health Care	16	6.56%
Agriculture	16	6.56%
Education	12	4.92%
Manufacturing	5	2.05%
Tech	5	2.05%
Hospitality	4	1.64%
Transportation	3	1.23%
Defense	3	1.23%
Financial Services	2	0.82%
Telecommunications	2	0.82%
Arts/Entertainment	2	0.82%
Food & Beverage	1	0.41%
Retail	1	0.41%
Banking	1	0.41%
Sports	1	0.41%
Other or None of the Above	83	34.02%



*\*34% responded as Other or None of the Above*

## **Review and Analysis of Online Dialogue Contributions**

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Over the course of the *USDOL's Efforts to End Labor Trafficking National Online Dialogue*, participants from across the U.S. shared thought-provoking and innovative ideas and recommendations on ways the USDOL can work to end labor trafficking. The range and depth of the ideas submitted and discussed during the online dialogue demonstrates the immense value of engaging citizens in collaboration efforts. Employers, workers, organizations, and state and local government representatives jointly contributed 104 ideas, 163 comments, and 496 votes to the dialogue. Based on these contributions, several themes emerged as key ideas among the stakeholders.

### **Key Themes and Takeaways**

Based on a preliminary analysis of the ideas posted to the dialogue, the several key themes and takeaways emerged, including the following:

- **Utilize USDOL's expertise and allow it to play a larger role in preventing and responding to labor trafficking**

Several ideas discussed the need for USDOL to be more involved in the government's efforts to end labor trafficking. One idea mentioned that "given [USDOL's] expertise in engaging workers in complex systems," they should play a larger role in preventing and combating labor trafficking. Additionally, one idea pointed out that civil remedies often better ensure compensation for victims and have a wider range of penalties that can be imposed to prevent businesses and others from engaging in trafficking in the future. One idea from the Advocates for Human Rights stated that they have been pleased with USDOL's ability to respond to labor trafficking issues when there is WHD investigation and suggested that there be a similar process when workplace safety issues are involved. Their idea stated that "OSHA should have similar abilities and training to respond."

Another participant specifically mentioned "those of us who have worked with trafficked persons for many years feel that Wage & Hour and OSHA personnel are often in situations where they could be seeing persons who are being trafficked but may not be focused on that possibility. Even after receiving training, trafficking is not currently an important focus of their job, as determined by the agency for which they work and by their supervisor."

- **Have USDOL coordinate and fund subject matter expertise in anti-trafficking organizations**

A participant in the dialogue shared the idea that "pilot funding employment specialists should be instilled in anti-trafficking organizations." In this case, referrals for employment support can be directed to "an anti-trafficking employment expert who sits in the anti-trafficking program that will already be developed to meet specialized needs of human

trafficking survivors. Additionally, this person will also be closely connected to ODEP's programs and can leverage these complex resources in the service area."

- **Have USDOL develop collaborative relationships with anti-trafficking organizations**

Other dialogue participants pointed out that it would be beneficial to have a relationship between "USDOL and labor trafficking organizations with the purpose to increase awareness of labor trafficking, to better assist victims of labor trafficking and to capture better data on labor trafficking."

- **Empower and train USDOL inspectors to recognize indicators of trafficking, identify and interact appropriately with potential victims and make appropriate referrals**

Many participants provided different ideas around training and how it could be used to enhance identification of victims and enforcement of labor trafficking laws. One idea suggested that "newly hired and current wage and hour inspectors receive comprehensive training on human trafficking as they are the critical front-line staff who may be coming into contact with victims." Other dialogue participants had similar ideas, including "train USDOL field personnel in OSHA, WHD, and other departments to identify and report signs of labor trafficking. Have them distribute informational materials during their visits with employers and workers." Participants mentioned specifically creating online training and downloadable education and tip sheets. One legal service provider contributed the idea that farmworkers would benefit if WHD trained investigators to screen for labor trafficking. Additionally, they suggested that their "clients would benefit by investigators providing contact information for local farmworker support services, particularly when investigators presume potential labor trafficking or other issues." Another agreed and wrote, "train Compliance Assistance Specialists (CAS) and Compliance Safety and Health Officers (CSHOs) on how to identify potential victims of labor trafficking while conducting OSHA activities." Another idea stressed the need for USDOL to have access to "a fluent speaking investigator [who] would assist in performing a thorough investigation for Wage and Hour violations and would allow for the investigator to ask clarifying questions of both the employer and employees that could assist in identifying those cases where human trafficking is suspected."

- **Provide employers and business additional means of identifying labor traffickers**

Several ideas discussed the different ways of identifying labor traffickers. One idea suggested "ETA and state farmworker agencies should partner to develop a system to ensure that ag employers are made aware when they are engaging in a business relationship with a recruiter that has been identified as an exploitative or labor trafficking recruiter." Another suggested that "ILAB should update its application to have a part that focuses on U.S.-based companies and worker exploitation/human trafficking in the United States." One idea from a representative of an agricultural employer stated that "what is needed is virtual tools to educate farmworkers and employers." The idea asked USDOL to "explore funding

virtual training tools, smart phone applications, and social media campaigns that can reach farmworkers of all languages and literacy levels.”

- **Educate the community and others about labor trafficking**

Participants discussed the need to educate the public about labor trafficking. One idea highlighted several ways to reach the community and educate them about labor trafficking including setting up “educational events about how and where modern slavery exist in this country.” Others highlighted the need to train and work with community partners to educate the public on how to identify and report abuses. One idea mentioned reaching out to partners including faith-based organizations, schools, health care providers, labor centers, non-profits, embassy/consulates, and media outlets. One participant suggested participating in community fairs and other events to promote an outreach program and answer questions from the public, and another also suggested participating in health fairs “to provide basic health screenings or preventive services in areas [where victims of labor trafficking are believed to reside] so we can gain their trust and discreetly provide outreach materials. Local help lines and safe locations need to be available so we can get them the help they need immediately.” Another participant suggested that WHD should seek to ensure workers know their rights and how to report abusive and exploitative work situations his includes complying with language access requirements in all materials.

- **Integrate labor trafficking awareness into workplace safety and health training and existing grants**

It was suggested that “worker safety training grants aimed to raise worker awareness of health and safety issues could integrate basic awareness training about workplace rights beyond OSHA issues, as well as indicators of labor trafficking, and what to do when labor trafficking is suspected.” Several ideas discussed increase funding to expand grants focus to include labor trafficking.

- **Ensure COVID-19 workplace safety measures for all frontline workers including those in industries at higher risk for trafficking, and integrate worker safety and health protections into all anti-trafficking initiatives**

Those who work in industries more likely to experience labor trafficking often have fewer overall worker safety protections as well. One dialogue participant pointed out that these “workers are less likely to be provided adequate sanitary measures, personal protective equipment (PPE), social distancing and other workplace safety measures or access to testing and medical care.” The individual recommended “ensure that all frontline workers—including industries where trafficking risks are highest, such as for migrant farmworkers and in meatpacking—have priority access to personal protective equipment (PPE) and COVID-19 testing and integrate protection of worker health and safety rights into all anti-trafficking initiatives.”

- **Equip USDOL agencies with necessary authorities and ensure interagency coordination to protect immigrant workers at workplaces under investigation**

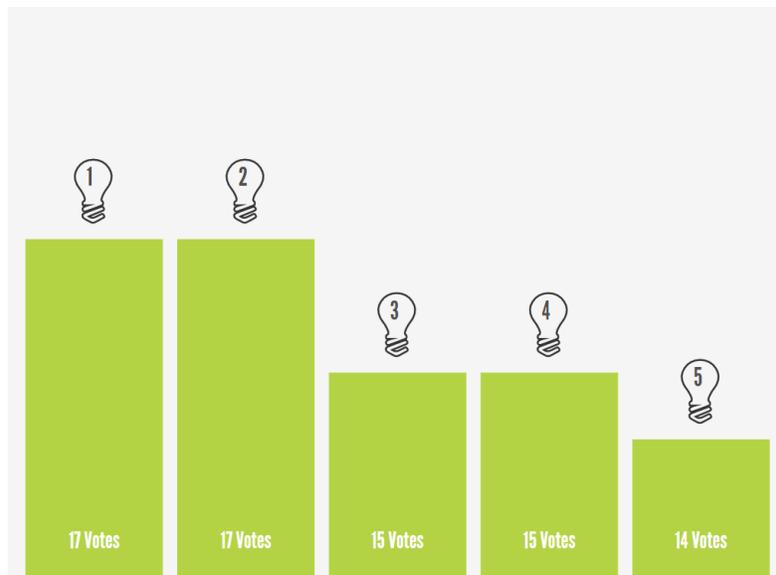
Several participants suggested DOL work proactively to prevent and protect immigrant workers from threats of deportation or related retaliation, and coordinate with DHS to provide Continued Presence for all immigrant workers in order to protect workers during any DOL investigation or inspection activity, and labor trafficking related investigation or possible prosecution. Some participants pointed out the need to comprehensively address the threat of deportation to silence whistleblowers and witnesses and recommended strengthening whistleblower protections, deconfliction policies, expanded application of the U-Visa program and deferred action to undocumented immigrants who are victims or witnesses to potential workplace crime. Participants additionally suggested all DOL agencies conducting investigations seek and utilize U and T-Visa certifying authority.

### **Top Ideas by Vote**

Below are the five top ideas by vote from the *USDOL's Efforts to End Labor Trafficking National Online Dialogue*.

The ideas listed in the following section include minor typographical corrections, which have in no way impacted the substance or the intention of the revised posts.

#### **TOP IDEAS BY VOTE**



- 1 DOL should claim an equal seat at the table with LEA partners
- 2 Fund Employment Specialists at Anti-Trafficking Programs
- 3 Opportunities to identify labor trafficking victims
- 4 WHD Should Enhance Training Efforts to Better Combat Trafficking
- 5 Improve Ag Employer Awareness of Exploitative Labor Recruiters

### **DOL should claim an equal seat at the table with Law Enforcement Agency (LEA) partners**

Topic: WHD Ensuring Proper Wages in The Workplace

17 Up Votes | 0 Down Votes | 17 Net Votes

Comments: 1

Followers: 2

*DOL Wage and Hour should claim an equal seat at the table with [criminal] LEA partners on human trafficking, especially in preventing and combating labor trafficking, given its expertise in engaging workers in complex systems. Additionally, civil remedies often better ensure compensation for victims and have a wider range of penalties that can be imposed to prevent businesses and others from engaging in trafficking in the future.*

*Too often USDOL Wage and Hour has deferred to agencies like DHS, DOJ, and the FBI in Anti-Trafficking work when it must claim an equal seat at the table. It should clarify its expertise and commitment to this issue in an MOU of understanding with DHS, DOJ, and FBI where cases are not just referred to USDOL if they are declined for criminal prosecution but both civil and criminal remedies are considered on equal footing. Additionally, to support these efforts the following actions should occur:*

*(1) USDOL should request the 5 million that was initially authorized under TVPA of 2000 in its 2022 budget to fund Anti-Trafficking work and in future years request even more funding. To the best of my knowledge, USDOL has never requested specialized funding for Anti-Trafficking efforts*

*(2) USDOL and HHS not DHS should lead efforts that DHS has spearheaded under the Blue Campaign for outreach and prevention as both agencies have greater trust from vulnerable communities and expertise in these areas. DHS should at the very least transfer some of the resources it uses for these efforts to HHS and USDOL. USDOL should make this request of DHS given its expertise in worker outreach.*

*(3) USDOL WHD should request additional labor inspectors. As our country looks inward at our LEA centered approach to many issues, USDOL should asked to be properly staffed and resourced to combat human trafficking and other forms of labor exploitation that will prevent trafficking and not be shy in highlighting that it is its expertise that are relevant and needed in this arena.*

### **Fund Employment Specialists at Anti-Trafficking Programs**

Topic: ODEP's Work Supporting Survivors On The Job

17 Up Votes | 0 Down Votes | 17 Net Votes

Comments: 0

Followers: 3

*Often times seeking employment support through ODEP's programs is re-traumatizing for sex*

*and labor survivors who often need additional support in seeking employment due to trauma, a history of abuse, safety concerns, or lack of employment experience different from others who commonly seeks assistance from these programs. Instead of trying to coordinate programs within ODEP, ODEP should pilot funding employment specialists at Anti-Trafficking organizations. Then referrals for employment support in that area can go to an Anti-Trafficking employment expert who sits in the Anti-Trafficking program that will already be developed to meet specialized needs of human trafficking survivors. Additionally, this person will also be closely connected to ODEP's programs and can leverage these complex resources in the service area.*

### **Opportunities to identify labor trafficking victims**

Topic: OSHA's Worker Rights And Protections

15 Up Votes | 0 Down Votes | 15 Net Votes

Comments: 1

Followers: 1

*At previous meetings in DC with officers of a couple of departments, some of us proposed that investigators from departments such as Wage & Hour, as well as OSHA, were in a position to be aware of, identify, and report possible cases of labor trafficking to other enforcement agencies, or even to social services providers who work with trafficked persons.*

*DOL personnel are at times better equipped to do this, as agents from other federal agencies are often rewarded only if their work produces arrests or prosecutions. The annual performance evaluations for USDOL personnel are based on other achievements. We have been made aware that even if an agent from a different enforcement arm wants to investigate trafficking cases they may be impeded by their supervisor.*

*Those of us who have worked with trafficked persons for many years feel that Wage & Hour and OSHA personnel are often in situations where they could be seeing persons who are being trafficked but may not be focused on that possibility. Even after receiving training, trafficking is not currently an important focus of their job, as determined by the agency for which they work and by their supervisors.*

*Thanks for considering this. Bill, Mosaic Family Services*

### **WHD Should Enhance Training Efforts to Better Combat Trafficking**

Topic: WHD Ensuring Proper Wages in The Workplace

15 Up Votes | 2 Down Votes | 15 Net Votes

Comments: 1

Followers: 2

*(1) WHD should ensure all newly hired and current wage and hour inspectors receive comprehensive training on human trafficking as they are the critical front-line staff who may be*

*coming into contact with victims. Training should be on both labor and sex trafficking, with a focus on forced criminality, and the overlap between sex and labor trafficking. Wage and Hour Inspectors are well positioned to identify all forms of trafficking, not just labor trafficking and not just labor trafficking in legal industries.*

*(2) WHD should also develop a robust training program on wage theft and wage related issues, including broad awareness of the scale of wage theft compared to other forms of theft in the economy (see this link for more information: <https://www.epi.org/publication/wage-theft-bigger-problem-theft-protect/>) as well as how to report and respond to either potential cases of wage exploitation or potential cases of labor trafficking. WHD should partner with DHS as well as interested State Departments of Labor to deliver these trainings to state and local law enforcement in order to raise the awareness of local police officers with regard to these issues, as a complement to training on how to identify and respond to labor and sex trafficking. This could bolster and enhance the awareness and capacity of law enforcement to respond to labor trafficking, and help deter wage theft, which is an underlying factor in many labor trafficking cases.*

### **Improve Ag Employer Awareness of Exploitative Labor Recruiters**

Topic: ETA and State Efforts to Educate Farmworkers and Ag Employers

14 Up Votes | 0 Down Votes | 14 Net Votes

Comments: 2

Followers: 3

*In some instances, Agriculture employers in the U.S. may be unaware of the exploitation taking place at the level of labor recruitment overseas with regard to their specific workforce. ETA and state farmworker agencies should partner to develop a system to ensure that ag employers are made aware when they are engaging in a business relationship with a recruiter that has been identified as an exploitative or labor trafficking recruiter. This could take the form of an alert system to flag for employers when they are engaging with recruiters that are on lists of debarred recruiters under guestworker programs, or recruiters crowd sourced as being problematic by platforms such as CDM's Contratos (<https://contratos.org/>) with agriculture employers who are recruiting workers. The program should also include training and education efforts to raise the level of awareness of especially smaller scale growers around these issues.*

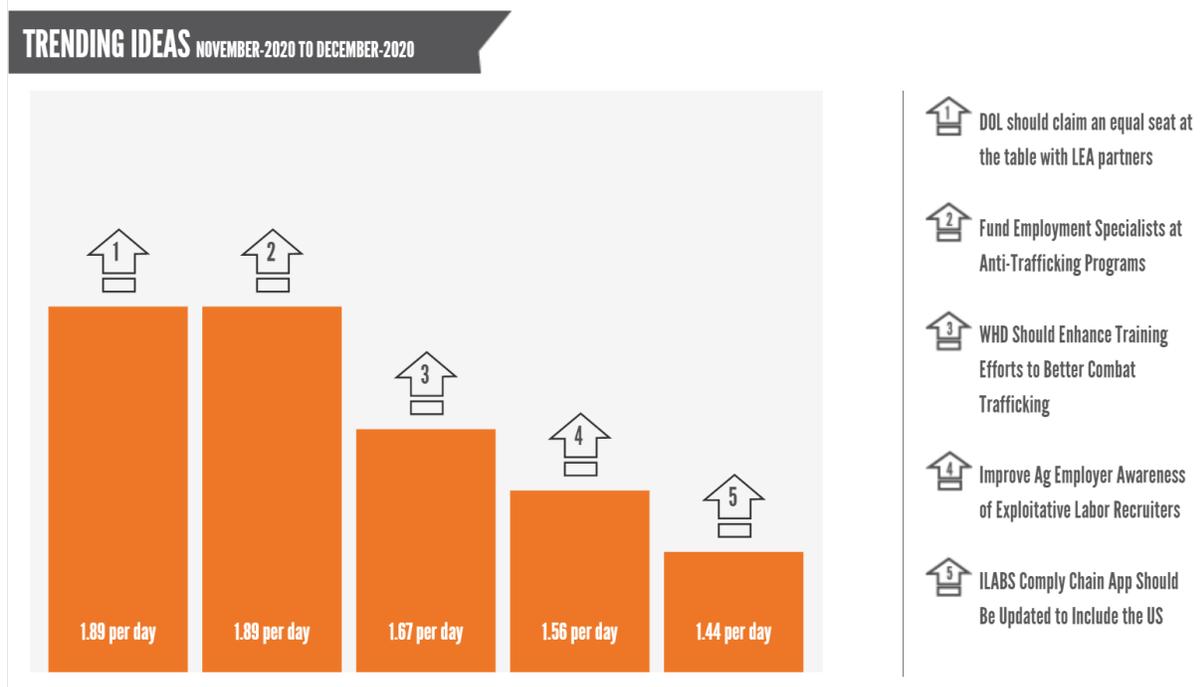
### **Top Trending Ideas**

Below are the top trending ideas over the course of the *USDOL's Effort to End Labor Trafficking National Online Dialogue*. Trending is determined based on the idea's percent growth in number of views, comments, votes, and followers.

The top trending idea, **USDOL Should Claim an Equal Seat at the Table with Law Enforcement Agency (LEA) partners**, was also the top idea by vote. In addition, three other

top trending ideas (**Fund Employment Specialists at Anti-Trafficking Programs, WHD Should Enhance Training Efforts to Better Combat Trafficking** and **Improve Ag Employer Awareness of Exploitative Labor Recruiters**) were also included in the top ideas by vote. See the Top Ideas by Vote section for full idea descriptions. Below is the other top trending idea.

The ideas listed in the following section include minor typographical corrections, which have in no way impacted the substance or the intention of the revised posts.



**ILABS Comply Chain App Should Be Updated to Include the US**

Topic: ILAB's Comply Chain App  
 13 Up Votes | 0 Down Votes | 13 Net Votes  
 Comments: 0  
 Followers: 2

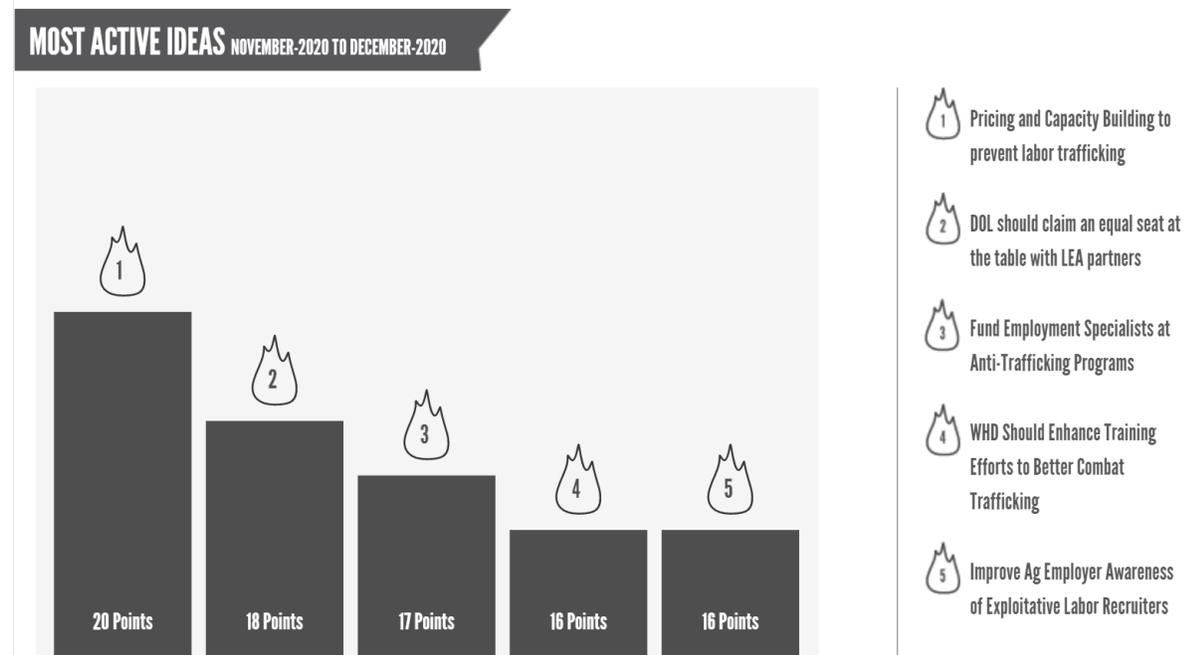
*ILAB should update its application to have a part that focuses on US based companies and worker exploitation/human trafficking in the United States. The United States must provide the same tools to workers and companies at home as it does for workers/companies abroad given the abuse that exists in our own backyard.*

**Most Active Ideas**

Below are the most active ideas from the *USDOL's Effort to End Labor Trafficking National Online Dialogue*. Most active is determined based on the idea's total number of views, comments, votes, and followers over the course of the dialogue.

Three of the most active ideas, USDOL **should claim an equal seat at the table with LEA partners, Fund Employment Specialists at Anti-Trafficking Programs, WHD Should Enhance Training Efforts to Better Combat Trafficking** and **Ag Employer Awareness of Exploitative Labor Recruiters** were also the top ideas by vote or top trending ideas. See the Top Ideas by Vote or the Trending Ideas sections for a full description. Below are the other top trending ideas.

The ideas listed in the following section include minor typographical corrections, which have in no way impacted the substance or the intention of the revised posts.



### **Pricing and Capacity Building to prevent labor trafficking**

Topic: Reopening Businesses

8 Up Votes | 2 Down Votes | 6 Net Votes

Comments: 10

Followers: 4

*It is nearly impossible for most industries to eliminate human trafficking and labor exploitation in their supply chain without vertically integrating. Many products we use, from its raw material form to manufacturing to transportation to retail may at some points have been worked on by slave labor. In most cases, workers employed by contractors or raw material suppliers, occupy the lowest levels of the supply chain pyramid. They are most at risk for labor trafficking. The problem is systemic and cannot be solved simply by changing contractors or suppliers. Proper pricing on goods produced with detailed cost breakdowns especially where slavery is most common can identify problem areas. Once these areas are identified, a comprehensive capacity building strategy should be undertaken to help the region. Most of the problematic businesses*

*also operate in economic and geographic clusters, making a capacity building strategy that builds on existing infrastructure the most efficient way to eliminate slave labor conditions.*

### **Most Popular and Relevant Ideas**

Below are some of the most popular and relevant ideas from each of the *USDOL's Effort to End Labor Trafficking National Online Dialogue* is six topic areas. Most popular is determined based on the idea's total number of up votes, comments, and followers at the conclusion of the dialogue. Most relevant is determined by the recurrence of similarly themed ideas or areas of concern posed to a particular campaign rather than the number of votes, etc. each idea received. Higher relevance may also be attributed to ideas which reference a specific program, policy, practice or other topic within the scope of one or more campaigns.

The ideas listed in the following section include minor typographical corrections, which have in no way impacted the substance or the intention of the revised posts.

### **Most Popular Ideas from the ODEP's Work Supporting Survivors on The Job Campaign**

**1. Fund Employment Specialists at Anti-Trafficking Programs** *(the full description of this idea can be found under Top Ideas by Vote)*

17 Up Votes | 0 Down Votes | 17 Net Votes

Comments: 0

Followers: 3

**2. Employer Education**

7 Up Votes | 0 Down Votes | 7 Net Votes

Comments: 2

Followers: 1

*In my opinion, if an employer is going to hire a "Survivor" they first need to educate themselves regarding "post survival states of mind". ODEP would create a training module for employers about this subject in which the employer would receive a certificate of completion. Ideally, the employer would need this certificate prior to hiring a "Survivor".*

### **Most Popular Ideas from the ILAB's Comply Chain App Campaign**

**1. Comply Chain App Should Be Updated to Include the US** *(the full description of this idea can be found under Top Trending Ideas)*

13 Up Votes | 0 Down Votes | 13 Net Votes

Comments: 0

Followers: 2

## 2. Update the app to raise awareness of downstream brands

12 Up Votes | 0 Down Votes | 12 Net Votes

Comments: 0

Followers: 2

*ILAB could deliver targeted grants to local civil society organizations in countries and migration corridors where commodities and goods identified to have high incidences of labor trafficking are sourced, as reflected in the App and underlying research. The grants would specifically seek to raise awareness among local workers and worker organizations about the brands and products downstream from their work. Oftentimes workers are not aware of the goods and brands that they are contributing to, and this lack of knowledge limits their ability to act collectively and with civil society to pressure the large companies that are ultimately profiting from their exploitation. By connecting the knowledge in the App with workers, this effort could leverage that knowledge to expand workers' ability to seek redress and support from these major companies they would otherwise not know they were affiliated with.*

### **Most Popular Ideas from the WHD Ensuring Proper Wages in The Workplace Campaign**

#### 1. **DOL should claim an equal seat at the table with LEA partners** *(the full description of this idea can be found under [Top Ideas by Vote](#))*

17 Up Votes | 0 Down Votes | 17 Net Votes

Comments: 1

Followers: 2

#### 2. **WHD Should Enhance Training Efforts to Better Combat Trafficking** *(the full description of this idea can be found under [Top Ideas by Vote](#))*

15 Up Votes | 2 Down Votes | 15 Net Votes

Comments: 1

Followers: 2

### **Most Popular and Relevant Ideas for the OSHA's Worker Rights and Protections Campaign**

#### 1. **Opportunities to identify labor trafficking victims** *(the full description of this idea can be found under [Top Ideas by Vote](#))*

15 Up Votes | 0 Down Votes | 15 Net Votes

Comments: 1

Followers: 1

#### 2. **Susan Harwood Grants could integrate labor trafficking awareness**

13 Up Votes | 0 Down Votes | 13 Net Votes

Comments: 1

Followers: 2

*Worker safety training grants aimed to raise worker awareness of health and safety issues could integrate basic awareness training about workplace rights beyond OSH issues, as well as indicators of labor trafficking, and what to do when labor trafficking is suspected. It would be important to avoid creating significant additional burden on grantees, and this would ideally be paired with additional discretionary funding to support the labor trafficking modules. This should be undertaken in multiple languages. A light level of labor trafficking awareness could leverage the reach of these small grants without impacting their health and safety impact. The Department should seek expansion of funding to supplement this program.*

### **3. Increase Investigations and Reporting**

5 Up Votes | 0 Down Votes | 5 Net Votes

Comments: 3

Followers: 1

*DOL should increase inspections by WHD and OSHA teams and train all inspectors on identification of possible signs of labor trafficking. All potential trafficking should be shared with appropriate law enforcement partners for investigation and possible prosecution. DOL should coordinate with DHS to provide Continued Presence for all immigrant workers at these workplaces that are identified as potential labor trafficking, in order to protect the workers during the investigation and possible prosecution.*

### **4. Extra Worker Protections in Light of COVID**

9 Up Votes | 0 Down Votes | 9 Net Votes

Comments: 3

Followers: 2

*Victims of forced labor lack control over the safety of their working conditions, including potential exposure to COVID-19. These workers are less likely to be provided adequate sanitary measures, personal protective equipment (PPE), social distancing and other workplace safety measures or access to testing and medical care. At the same time, DOL/OSHA is extremely underfunded, is yet to issue enforceable workplace safety rules related to COVID-19 (and CDC guidelines remain advisory only) and has done almost nothing to apply existing workplace safety protections to the COVID-19 context. It is therefore critical that the next Administration issue and enforce an Emergency Temporary Standard on how to protect workers from COVID-19, ensure that all frontline workers—including industries where trafficking risks are highest, such as for migrant farmworkers and in meatpacking—have priority access to personal protective equipment*

*(PPE) and COVID-19 testing and integrate protection of worker health and safety rights into all anti-trafficking initiatives. To give just one other salient example, workers who are at risk of trafficking are more likely to work outside and are dying in increasing numbers due to rising temperatures, yet there is no federal heat stress standard. Frontline workers also need to be given whistleblower protections for reporting cases to DOL/OSHA inspectors and others.*

## **5. Protecting Workers During the COVID-19 Pandemic**

3 Up Votes | 0 Down Votes | 3 Net Votes

Comments: 3

Followers: 1

*Especially during the COVID-19 pandemic, OSHA must continue to protect workers by investigating complaints and carrying out worksite inspections to ensure migrant workers are working in safe environments. OSHA should issue an Emergency Temporary Standard providing regulations to protect workers against coronavirus exposure in the workplace and including specific, enforceable requirements. Temporary visa workers should be able to leave employers who are not providing safe working conditions without fear of retaliation or losing their visa status.*

*Reaching workers is critical. At the very minimum, OSHA should have all materials available in Spanish, but the department will better reach workers by ensuring materials are available in Indigenous languages.*

## **6. Revise Nonimmigrant Work Visas**

6 Up Votes | 0 Down Votes | 6 Net Votes

Comments: 1

Followers: 1

*Limited protections provided by nonimmigrant work or guestworker visas increase the vulnerabilities of foreign workers to forced labor. The COVID-19 pandemic has only increased these vulnerabilities by making it more difficult for workers to leave abusive employers. All workers in the United States should be able to work for employers that implement worker-centered protections, including COVID-19 protections, be able to exercise their freedom of association rights without fear of retaliation, and to blow the whistle on abusive employers or and to leave dangerous working conditions without losing visa protections. ATEST recommends DOL implement the following policies to protect guestworkers:*

- *Increase protections for guestworkers so they are able to leave their employers if they do not implement and follow worker-centered COVID-19 guidelines or if employers*

*engage in workplace violations such as wage theft or retaliation for speaking out against violations;*

- *Automatically extend worker visa authorizations should a guestworker be laid off due to COVID-19; and*

- *Work with Congress to reform the system of temporary visas to untie visas from employers, allowing workers to leave abusive and exploitative employers without fear of deportation. This situation has been exacerbated during the COVID-19 pandemic but has been an issue since well before the pandemic.*

## **7. All Workers Must Be Able to Report Hazards without Fear**

0 Up Votes | 0 Down Votes | 0 Net Votes

Comments: 1

Followers: 1

*Workers are the eyes and ears of workplaces. When they can report hazards without fear they not only avert danger for themselves but entire workplaces -- and in a time of COVID, families and communities as well. Too often employers use the threat of deportation to silence employees. OSHA must do everything in its power to protect workers who speak up - with strong whistleblower protections (including responding to the Inspector General's recent recommendations), strengthening the OSHA deconfliction memo and expanding the UVisa program and the use of parole and deferred action to undocumented immigrants who are victims of or witnesses to workplace crime. Without Congressional action OSHA can still fill vacancies in the 11c program, improve investigations through better triage systems, use the bully pulpit to make it clear that retaliation is against the law, and draw attention to the consequences through press releases as citations are issued.*

*That said, Congress should be called upon to strengthen OSHA 11c whistleblower protections, including extending the statute of limitations from 30-days to 180-days; creating a private right of action; applying a "contributing factor" rather than "but for" causation; establishing a rebuttable presumption of retaliation when the adverse action occurs within 90 days of the protected activity; and otherwise modernizing the standard consistent with all of the modern whistleblower laws.*

## **8. Zealously Work to End Migrant Worker Abuse**

3 Up Votes | 0 Down Votes | 3 Net Votes

Comments: 1

Followers: 1

*Over the past five and a half years, at least 4,315 migrant workers in temporary visa programs-- across visa categories and industries-- have been subject to human trafficking. Every year, migrant workers reach out to our offices seeking relief from coercive and trafficking-like work conditions. Earlier this year, CDM filed a lawsuit against a Michigan nursery on behalf of six H-2A agricultural Mexican workers after their employer failed to pay them their wages, leaving them without the means to buy food and contact their families back home. Furthermore, we have also documented and advocated to end human trafficking across labor migration programs through the coalition we chair, Migration that Works, a coalition of labor, migration, civil rights, and anti-trafficking organizations and academics.*

*The Department of Labor (DOL) has a critical and essential role in ensuring that migrant workers do not fall into labor trafficking situations. The COVID-19 global pandemic has exposed and heightened the labor abuse and systemic flaws within the temporary work visa programs. During the COVID-19 crisis, CDM has heard from many workers that leaving general abusive conditions is extremely difficult because of fears of retaliation, lack of alternative employment during the pandemic, and decreased enforcement by monitoring agencies such as the Occupational Safety and Health Administration (OSHA). We suspect similar or even more difficult constraints for workers in trafficking conditions. Thus, we welcome the DOL's efforts to receive feedback and encourage the Department to implement recommendations that strengthen protections and decrease vulnerability to abuse for migrant workers.*

#### *Temporary work visa programs and trafficking*

*Every year, hundreds of thousands of migrant workers in visa programs ranging from the H-2 to the J-1 to the TN visa programs, to name a few, are recruited in their home countries to work in the U.S. Workers are often coerced by illicit recruiters and employers to pay exuberant fees for the opportunity to work in the U.S. Workers often take out loans to cover these fees, only to arrive at their work site in the U.S. and find a different reality from the one that was promised: a reality of hazardous working conditions, deplorable housing, stolen wages, and even forced labor. At the time of arrival, many employers and recruiters confiscate workers' passports and identification cards, keeping workers dependent on employers for many necessities and travel back to their home countries. Because workers are often bound by their visa to a particular employer, they are particularly vulnerable to unchecked harassment and left open to exploitation and trafficking. And with little government oversight or enforcement, workers experience a difficult time accessing justice.*

#### *Recommendations*

*The following are a set of recommendations to ensure that migrant workers in temporary visa programs receive adequate services and anti-trafficking protections from the DOL:*

*Prohibit charging recruitment and other pre-employment fees:*

*Workers who arrive indebted are more likely to remain in conditions of abuse and coercion. Through regulation, the DOL should ban employers and recruiters across all visa categories*

*from charging workers fees for the opportunity to work. Recruitment-related costs should be borne by the employer and fees that have been paid by workers should be reimbursed by the employer. DOL should vigorously enforce these regulations, investigate workers' claims, and punish bad actors who charge workers illicit fees.*

*DOL should also establish an Office of Labor Recruitment Certification and Oversight. The Office should be charged with monitoring employer practices and enforcing regulations across all visa categories and industry sectors. Housed in the Wage and Hour Division (WHD), the Office should consolidate WHD's enforcement role with the functions of the Office of Foreign Labor Certification, such as certifying visas, wage rates, and recruiters. The Office should be charged with creating and maintaining a database of all labor recruiters and should have the power to block program violators from accessing visas. The Office should receive delegated authority to enforce regulatory protections under those visas currently housed in the Department of State (DOS).*

*Anti-Retaliation and Whistleblower Protections:*

*Coming forward is difficult for workers in trafficking conditions, and it is especially challenging for migrant workers whose immigration status and sole employment opportunity also depends on their employer. For example, workers who report having paid illicit fees in the H-2 program worry that coming forward will make them ineligible for future visas, even if those fees make them highly indebted and more prone to trafficking. DOL must issue regulations that include whistleblower protections to ensure that workers who acknowledge having paid fees are not fired from their current job and that the acknowledgement does not prevent them from being hired for future work, either with the same employer or other employers.*

*In order to encourage migrant workers to reach out for help in situations of coerced labor and trafficking and to dissuade bad actors, DOL should also actively inform employers and workers about anti-retaliation provisions and the consequences of any violations. DOL should include a statement in labor certification applications that petitioners and any agents or sub agents will comply with U.S. law during recruitment and be held legally accountable in any jurisdiction if they fail to comply.*

*Lastly, DOL must create an expedited investigation process for workers on temporary work visas on their cases to ensure that all witness testimony and evidence is preserved given the short-term nature of the visas.*

*Interagency Task Force: Labor trafficking is an issue that requires dialogue and action from all parties and agencies involved. The DOL, DOS, Department of Homeland Security (DHS), and National Labor Relations Board, among other agencies, must come together and revive the interagency task force to address human trafficking in a unified manner. We believe this agency must be headed by DOL to ensure workers' interests are at the core of discussion. Through this task force, DOL must leverage interagency channels to vigorously support workers' requests for deferred action (including employment authorization) from DHS when workers seek to enforce labor or civil rights.*

*Transparency of Temporary Workers' Visas: When workers are not informed about their employers, they are unable to make an informed decision about their employment. We encourage DOL to track visa information from all visa employment categories including J-1 and to make information about employers, companies' past violations, terms of employment, visa type, available to workers in a reliable, accessible, public website in their language. Currently, the Seasonal Jobs website only applies to a few sets of visas and is not accessible to workers.*

*Employer Accountability: DOL must zealously enforce labor laws to prevent the worker vulnerability that underlies labor trafficking. Moreover, DOL must safeguard the workplace rights of migrant workers both while workers are in the U.S. and after they have returned to their countries of origin. We also recommend that DOL debar noncompliant and abusive companies and increase OSHA investigations. As an organization with offices in Mexico, we also encourage DOL to mandate that regional and local offices of the WHD be permitted to make international phone calls in furtherance of investigations involving migrant workers that have returned to their countries of origin.*

*U and T Visas:*

*We recommend that all federal Wage and Hour investigators, and those of other agencies who may receive delegated authority, undergo required training on issues specific to temporary work visas, including deferred action requests, U visa certifications, T visas, visa sponsorship remedy, fraud in foreign labor contracting and recruitment abuse.*

*DOL should delegate certification authority to all DOL agencies, including OSHA, for all U visa qualifying crimes.*

*We encourage DOL to ensure appropriate funding to WHD enforcement to protect workers who denounce or seek to denounce abusive or illegal employment or recruitment practices so that they do not fear retaliation from employers or labor contractors.*

*Language, Cultural Competency, and Outreach in DOL:*

*We encourage DOL to publish multilingual educational resources, particularly in the languages most commonly spoken by migrant workers, and to increase the reach and visibility of these educational resources in migrant workers' countries of origin.*

*Conclusion*

*Even before the COVID-19 pandemic, migrant workers have served essential roles for the U.S. and are the fabric of our communities. Understanding workers' experiences and how they are recruited for these jobs is critical to ensure that these temporary work visa programs are not conduits for labor abuse. We encourage DOL to implement the recommendations above to ensure that labor trafficking is not occurring in the temporary work visa programs.*

## **Most Popular Ideas from the ETA and State Efforts to Educate Farmworkers and Ag Employers Campaign**

### **1. Improve Ag Employer Awareness of Exploitative Labor Recruiters** (*the full description of this idea can be found under **Top Ideas by Vote***)

14 Up Votes | 0 Down Votes | 14 Net Votes

Comments: 2

Followers: 3

### **2. Labor Trafficking**

9 up Votes | 0 Down Votes | 9 Net Votes

Comments: 2

Followers: 1

*The Little Hoover Commission recently released a series of three reports aimed at strengthening the State of California's response to labor trafficking. These reports were developed with contributions from numerous expert stakeholders across the state and the nation - victims and their advocates; prosecutors; labor inspectors and other critical local, state, and federal government employees; academic and legal researchers; and members of the public. The Commission learned about and described in its reports a number of challenges to combatting labor trafficking: the lack of prevalence data, the need to coordinate across agencies and jurisdictions, the difficulty identifying labor trafficking, limited help for victims, and the difficulty enforcing state laws against trafficking. Each report contains specific recommendations for state lawmakers to take stronger action to detect this crime, help victims and survivors, and prosecute traffickers. Though geared toward California, these findings and recommendations may help inform efforts elsewhere. The Commission's reports and other material related to these studies are available at [www.lhc.ca.gov](http://www.lhc.ca.gov):*

*Human Trafficking: Coordinating a California Response (June 2020):*

<https://lhc.ca.gov/sites/lhc.ca.gov/files/Reports/250/Report250.pdf>

*Labor Trafficking: Strategies to Uncover this Hidden Crime (September 2020):*

<https://lhc.ca.gov/sites/lhc.ca.gov/files/Reports/251/Report251.pdf>

*Labor Trafficking: Strategies to Help Victims and Bring Traffickers to Justice (October 2020):*

<https://lhc.ca.gov/sites/lhc.ca.gov/files/Reports/252/Report252.pdf>

*About the Little Hoover Commission - The Little Hoover Commission is a bipartisan, independent state oversight agency created in 1962. It includes 13 Commissioners appointed by California's Governor and legislative leaders. The Commission's mission is to investigate state operations and promote efficiency, economy, and improved service.*

## **Most Popular and Relevant Ideas for the CIOI Supports Faith-Based Organizations to Help End Labor Trafficking Campaign**

### **1. Ideas to Help End Labor Trafficking**

10 Up Votes | 0 Down Votes | 10 Net Votes

Comments: 2

Followers: 3

*Thank you for the opportunity to share ideas to help end labor trafficking. My suggestion is to create and/or expand an outreach and education program that helps increase awareness of this issue and educates the community to identify and report working conditions anonymously. Key areas of a robust outreach and education program can include:*

- 1. Train USDOL field personnel in OSHA, WHD, and other departments to identify and report signs on labor trafficking. Have them distribute informational materials during their visits with employers and workers.*
- 2. Develop web human trafficking awareness materials/programs in appropriate languages, including:
  - Online training programs.*
  - Downloadable educational handouts and tip sheets.**
- 3. Create and advertise a tip hotline where community members can report abuses anonymously.*
- 4. Educate employers ID human trafficking from labor contractors and other Groups/organizations.*
- 5. Set-up educational events to train the community about how and where modern slavery exist in this country.*
- 6. Train and work with Community partners to educate the public and identify/report abuses. Partners include faith-based organizations, schools, health care providers, labor centers, non-profits, embassy/consulates, media outlets.*
- 7. Participate in community fairs and educational events to promote this program and answer questions from the public.*

### **2. Take away the means of human traffickers and support workers**

4 Up Votes | 0 Down Votes | 4 Net Votes

Comments: 1

Followers: 1

*Take away the means human traffickers are using, punish those who do the human trafficking, and help the victims of trafficking to get what they need. It is like fighting a fire that is trying to consume your house and loved ones. If we can shut off the abuse of local citizens, it will help in shutting the pipeline of foreign victims.*

*First off change employment law so that so that if you quit or get fired the employee gets unemployment benefits. Employment is not slavery! People should get penalized for working or bettering themselves by leaving. Make unemployment benefits more like a golden parachute or a 401K, so that for whatever reason the employee has a way to leave. Or do away with unemployment all together. Use the Unemployment staff to enforce the employment laws, let them chase criminals. Use the government employees to hunt down the people who use minors and others for criminal gain. Make it unprofitable to be a human trafficker. Stop pandering to the employers. Make the public servants help the public not a few rich employers. Criminals get free legal help, so employees should get free legal help. The employee should not have to pay legal fees for blowing the whistle on criminal activity. There are warning labels on dangers products and food items. The companies have to post the employments laws on their properties, so each employer should have to hand out their rating to each new employee.*

*I worked for a large rental car company. They broke the code of federal regulations, among other things, like not sanitizing cars. I could not get any law enforcement to seriously investigate them. After a while everyone just knows the big powerful companies get away with anything. If I had an unemployment 401K I would have quit.*

*Change the law so that legal citizens can homestead, or use sweat equity to acquire food, shelter, property, etc. People have human needs, why should there be laws that keep people dependent while "we the people" pay others to keep resource for the rich or powerful to have and use? For example, a few people were human trafficked for 5 years. "We the peoples" public servants arrested the criminals and took ownership of that 10-acre plot of land, with two buildings on it, that was taken from a human trafficking operation. Some of the victims would gladly stay and work if they owned the property. Just give them the land, etc. There could also be land, a free fishing license, etc. for anyone who gets fired or quits a job. If you legally worked a number of years give, We the people a chance.*

### **3. Partnership with places of worship**

3 Up Votes | 0 Down Votes | 3 Net Votes

Comments: 1

Followers: 1

*Places of worship can be great partners in reaching out to vulnerable workers. Many vulnerable workers, especially those in immigrant communities rely on their places of*

worship. Churches, temples, mosques, gurdwaras, etc..., can be "the community" that the traffickers will seek to remove from the victim as part of the grooming/conditioning process. By letting the vulnerable parishioners know they have a community that will always be with them no matter where they are, it can mean a lot and a willingness to seek help. A contact information, emergency funds, and care packages can be great resources for vulnerable workers as they will often leave their ethnic communities to find work.

The Wage and Hour Division has a program called EMPLEO that partners with the Catholic Dioceses to help the immigrants from Spanish and Tagalog speaking communities.

#### **4. Public private partnerships to stop Labor Trafficking**

1 Up Votes | 0 Down Votes | 1 Net Votes

Comments: 1

Followers: 1

*First of all, thank you for including us in your dialogue. I am a philanthropist in the Jewish nonprofit world and serve on many of the traditional and nontraditional Boards. My idea comes from both the woman's funding and traditional funding sectors. Faith based organizations are a perfect fit for this type of initiative on many fronts. They are part of large established networks of diverse people and committees, most who volunteer and understand the importance of helping others. They have developed relationships and networks among the various groups or subgroups of these organizations including woman's-based organizations focusing on these types of abuses. Our enormous numbers and worldwide networks enable us to communicate, distribute, interact raise money to fund programs and help others. We have international and local ties with Governments, allowing us to set up meetings, have meaningful dialogue and get things done in ways traditional governmental workers cannot. Most of all we are a group of doers, especially woman's groups. So here are some ideas.*

- 1. Rally these Jewish/non-Jewish groups around this important issue by establishing and educating Federal and State public/private partnerships around this important initiative of Labor Trafficking. In Georgia we have such a partnership for human trafficking, it would be a natural fit to extend it.*
- 2. Provide education, training and information through easily accessible online resources, as well as group training. Also, when it is safe again to meet hold I person faith-based events, focusing on these issues.*
- 3. Use your faith-based leaders to Identify major Jewish/non-Jewish faith-based groups you wish to approach and have them be the bridge faith as a way to be introduced into these organizations and set up meetings. I have a list of Nationwide and international Jewish organizations if you need them that I am part of.*

4. *Once part of these networks, you can disseminate monthly information, and links to millions of people as well as have volunteers working with you to identify cases, provide services to those in need, help develop a reporting and tracking system, and really the possibilities are whatever you may need. We also are very good at raising funds for worthy projects. It seems to me you have a mobile army of volunteers whose main focus is to help those in need, have the drive, heart and connections to move mountains for worthy humanitarian causes, and to make the world a better place. My idea is that you partner with us to do so.*

## Appendix A: Resources Shared During the Twitter Chat and Online Dialogue

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### DirectEmployers Association

- [USNLx.com](https://usnlx.com)

### National Disability Rights Network

- [National Disability Employment Policy, From the New Deal to the Real Deal: Joining the Industries of the Future](#)
- [NDRN Member Agencies](#)
- [Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program & Section 14\(c\)](#)
- [The 'Boys' in the Bunkhouse](#)

### The Human Trafficking Legal Center

- [An Advocate's Guide to Tax Issues Affecting Victims of Human Trafficking](#)
- [Importando La Libertad: Utilizando la Ley de Aranceles de EEUU para combatir el trabajo forzado en las cadenas de suministro](#)
- [Importing Freedom: Using the U.S. Tariff Act to Combat Forced Labor in Supply Chains](#)
- [Survivor Reentry Project](#)
- [Trafficking of Persons with Disabilities in the United States Fact Sheet](#)
- [Using the U.S. Tariff Act to Combat Forced Labor: New Guide Released](#)

### U.S. Department of Justice

- [18 U.S. Code § 1761. Transportation or importation](#)
- [18 USC 1589: Forced labor](#)
- [Communicating Effectively with Limited English Proficient Individuals](#)
- [Faces of Human Trafficking](#)
- [Human Trafficking Hotline](#)
- [U.S. Department of Justice – Human Trafficking](#)

### U.S. Department of Labor

- [Bureau of International Labor Affairs Mobile Applications](#)

- [Centers for Faith and Opportunity Initiatives](#)
- [Employer.gov](#)
- [Employment and Training Administration Monitor Advocate System](#)
- [Occupational Safety and Health Administration Worker Rights and Protections](#)
- [Office of Disability Employment Policy – Accommodations](#)
- [Wage and Hour Division Compliance Assistance Toolkits](#)
- [Wage and Hour Division Resources for Workers](#)
- [Worker.gov](#)

### **Resources Shared during the Online Dialogue**

- [CDM's Contratados](#)
- [Ending Child Labour, Forced Labour and Human Trafficking in Global Supply Chains Report](#) by International Labour Organization
- [Human Trafficking: A Treatment Guide for Mental Health Professionals](#) by the American Psychiatric Association
- [Human Trafficking: Coordinating a California Response](#) (June 2020)
- [Labor Trafficking: Strategies to Uncover this Hidden Crime](#) (September 2020)
- [Labor Trafficking: Strategies to Help Victims and Bring Traffickers to Justice](#) (October 2020)
- [PEARR Tool](#)
  - The PEARR tool, created by CommonSpirit Health, HEAL Trafficking, and Pacific Survivor Center is an evidence-based framework for assessment for trafficking and other forms of interpersonal violence. It is based off the CUES model, or universal education approach, which is trauma-informed, patient-centered, and recognizes that creating an emotionally and physically safe context for disclosure is often more effective than a checklist screening tool.
- [Polaris Project Report](#)
- [Wage Theft is a Bigger Problem Than Other Theft—But Not Enough is Done to Protect Workers](#) by the Economic Policy Institute

- [Counteracting the Bias: The Department of Labor's Unique Opportunity to Combat Human Trafficking](#)