

## **SUPPORTING STATEMENT (Part A)**

### **Survey of State Attorneys General Offices-Human Trafficking, 2018**

The Bureau of Justice Statistics (BJS) is establishing a new data collection program designed to conduct regular surveys of state attorneys general offices entitled *Survey of State Attorneys General Offices* (SSAGO). BJS routinely surveys law enforcement agencies, corrections agencies, state and local prosecutor offices, and indigent defense offices; however, the lack of data on state attorneys general offices is a significant gap. State attorneys general play an important role in the criminal and civil justice systems since they are the chief legal officers of their states and often represent their state in antitrust actions, consumer protections, criminal appeals, and serious statewide prosecutions.<sup>1</sup>

BJS first surveyed state attorneys general in 2014, with a collection called the State and Local White Collar Crime Program (SLWCCP) (OMB Control # 1121-0348, expired Oct. 31, 2017). That collection surveyed state attorneys general offices about the prosecution and civil enforcement of white collar crime, such as consumer fraud, bank fraud, and environmental infractions. BJS plans to release a report from the SLWCCP in the winter of 2019. BJS achieved an 86% response rate with that survey, and is now prepared to survey state attorneys general on new topics.

Following the success of the White-Collar Crime survey, BJS is planning a series of three surveys of state attorneys general offices. The first survey will focus on human trafficking (SSAGO-HT), and is the topic of this clearance request. The second survey will focus on the opioid crisis, and the third will focus on cybercrime. The SSAGO is designed to be a series of short, focused surveys on topics of interest to the nation and to the state attorneys general offices themselves.

The SSAGO-HT will collect data on criminal and civil human trafficking offenses handled by state attorneys general offices, along with information on interagency cooperation and training related to human trafficking. This will be the first BJS collection to examine the handling of criminal and civil human trafficking by state attorneys general offices.

Prior to the development of the SSAGO-HT, BJS reviewed the state attorneys general offices websites for the 50 states, the District of Columbia, and the five U.S. territories to make an initial determination of the importance of the issue to those offices (**Attachment 1**). Forty-four state attorneys general offices mentioned human trafficking initiatives, education, task forces, hotlines, or victims services information. BJS also used a review of state human trafficking laws conducted by the National Conference of State Legislatures for 2015-2017,<sup>2</sup> to determine that thirty-nine states had at least one statute that criminalized human trafficking, increased the length of incarceration or amount of fined penalties for that crime, or both. From this research, it is clear that state attorneys general offices are invested in the prosecution of human traffickers.

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<sup>1</sup>Summary drawn from [http://naag.org/naag/about\\_naag/faq/what\\_does\\_an\\_attorney\\_general\\_do.php](http://naag.org/naag/about_naag/faq/what_does_an_attorney_general_do.php)

<sup>2</sup>State human trafficking laws <http://www.ncsl.org/research/civil-and-criminal-justice/human-trafficking-laws-in-the-states-updated-nov.aspx>, retrieved November 2017

## A. Justification

### 1. Necessity of Information Collection

State attorneys general offices play an important role in criminal and civil prosecution for their states. Attorneys general offices typically handle complex cases, such as antitrust, statewide prosecutions, human trafficking, and cybercrime, many of which do not fall neatly within a specific division within an attorney general's office. For example, a human trafficking case may involve a cybercrime unit (if the Internet is involved) as well as a criminal unit, or multiple sections within a criminal unit. A case against a prescription drug manufacturer could involve multiple states, as well as a fraud unit and a criminal unit. Currently, there is no central data source that captures how attorneys general offices handle and respond to criminal matters. The collection of systematic information regarding the organization, structure, activities, and types of cases handled by state attorneys general offices would increase BJS's understanding of state criminal justice systems and document the important work done by state attorneys general offices that is not captured elsewhere in BJS collections, or by other federal data collections. For example, a recent National Academy of Sciences report noted that "there are some offenses such as fraud against the government (e.g., fraudulent medical benefit claims) in which state attorneys general or inspectors general may be the only potential, viable source—likewise for highly state-differing policies on gambling or alcohol enforcement."<sup>3</sup>

State attorneys general offices could also benefit from these data collections. The collections could allow state attorneys general offices to compare their own caseloads, staffing, and resources for human trafficking to those of their colleagues in other states.

### *Human Trafficking*

The Trafficking Victims Protection Act (TVPA, 2000, 22 USC § 7102, reauthorized through the Trafficking Victims Protection Reauthorization Acts (TVPRA) of 2003, 2005, 2008, and 2013) serves as the model law for trafficking. The act defines "trafficking in persons" as: "(A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery." The TVPA notes that human trafficking crosses several offense categories, potentially including kidnapping, false imprisonment, assault, fraud, extortion, and potentially immigration codes if the victims are transported internationally. The TVPA also recognizes that trafficking is likely to involve multiple states, or include an international component, making U.S. Attorneys and state attorneys general offices the likely prosecution sources.

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<sup>3</sup> Lauritsen, Janet L. and Daniel L. Cork, eds. 2018. *Modernizing Crime Statistics, Report 2-New Systems for Measuring Crime*. National Academies Press: pp 64-65.

On April 11, 2018, the President signed into law the Allow States and Victims to Fight Online Sex Trafficking Act (FOSTA), allowing victims and state attorneys general to file lawsuits against websites that promote or enable sex trafficking.

Neither the TVPA nor FOSTA provide mechanisms for reporting on the amount of human trafficking encountered by law enforcement or prosecuted under state law. In the absence of any such reporting requirement, those interested in the number of people prosecuted for human trafficking offenses must resort to data collection directly from prosecutors. Given the role that state attorneys general offices play in investigation and prosecution of suspected offenders, this data collection will play a significant role in articulating a complete picture of the justice system response to human trafficking.

Under Title 34 USC §10132 (**Attachment 2**), BJS is directed to collect and analyze statistical information concerning the operation of both the criminal and civil justice system at the federal, state, and local levels. Data on human trafficking are needed to address the following types of questions:

- What types of human trafficking cases are prosecuted by state attorneys general offices in the U.S.?
- How are civil and criminal human trafficking cases processed through the justice system?
- Who are the victims of human trafficking?
- What resources are necessary for state attorneys general offices to prosecute human trafficking?
- What other services are provided to human trafficking victims?

Data from the U.S. state attorneys general offices can help to answer some of these questions. Through this proposed collection, BJS will collect data on human trafficking cases prosecuted criminally by state and territory attorneys general; BJS will also ask about the civil cases filed against human traffickers. BJS currently plans to administer its National Survey of Prosecutors (NSP) (OMB Control # 1121-0149, expired Sept. 30, 2017) in 2019 or 2020 and include questions on that survey about human trafficking. Information collected from the NSP could then be combined with the data collected in this survey to provide a more complete understanding of how different states are handling these crimes.

## 2. Needs and Uses

Human trafficking is a topic of ongoing interest at all levels of the criminal justice system. At the state level, the annual meetings of the [National Association of Attorneys General](#) (NAAG) have focused on human trafficking as a priority for state attorneys general. NAAG also hosts the [National Attorneys General Training & Research Institute](#) (NAGTRI), which offers training and newsletters on human trafficking, demonstrating that state attorneys general are concerned with human trafficking.

At the federal level, DOJ published a [National Strategy to Combat Human Trafficking](#) in 2017. The plan addresses the federal government's plan to increase communication across agencies to stop human trafficking, as well as DOJ's plans to encourage cooperation among non-profit

agencies, state agencies, and the federal government to address labor and sex trafficking. In terms of federal support for state and non-profit agencies, the strategy stated that it will work to engage the National Governors Association and the National District Attorneys Association to provide human trafficking training.

BJS recently published a report on the federal prosecution of human trafficking cases, but there is very little knowledge about how state attorneys general offices or local prosecutor offices handle human trafficking. The lack of state-level information on human trafficking crimes is a major gap in the nation's criminal justice data infrastructure. State attorneys general are an important component of a state justice system's response to human trafficking. While there is currently limited empirical information, state attorneys general likely participate on task forces with other state law enforcement agencies, with the federal government, or with local prosecutor offices. Additionally, state attorneys general offices investigate and prosecute complex, major cases that have caused substantial harm and that require coordination with other in-state agencies. The SSAGO-HT will capture task force participation and cooperation with federal and local agencies, which is an important component of the prosecution of human trafficking.

Other users are expected to have an interest in the data from the SSAGO-HT, such as:

- The Bureau of Justice Assistance (BJA) has established the Anti-Human Trafficking Task Force Initiative, which develops training for law enforcement personnel to identify trafficking victims, and support and fund collaborative state law enforcement, victim services providers, and federal agency task forces.
- The Office for Victims of Crime (OVC) supports 146 programs in 34 states, the District of Columbia, and the Northern Mariana Islands under the OVC-Funded Grantee Programs to Help Victims of Trafficking.
- The National Institute of Justice (NIJ) awarded three grants directly related to human trafficking in FY2017. These grants supported research regarding indicators of online sex trafficking, evaluations of collaborative models to combat human trafficking, and examinations of labor trafficking.
- State and local agencies, such as prosecutor offices, victim service providers, and courts, are interested in the structure, operations, and caseloads of human trafficking. They could also use the SSAGO data in combination with their own data to analyze their state's overall response to human trafficking.
- Academic researchers and nonprofits will be able to use the data for their own research.

To address these data needs, the data collection instrument for the SSAGO-HT contains the following sets of questions:

Criminal prosecutions:

- *Number of criminal prosecutions:* BJS will collect information on the number of open criminal human trafficking cases prosecuted in 2018 by each state attorneys general office. BJS will also ask about the number of sex trafficking prosecutions and the number of labor trafficking prosecutions. Lastly, BJS will ask about how many cases involved adults or minors.

- *How cases were closed:* BJS will ask how many criminal trafficking cases were closed by guilty finding, dismissal, not guilty findings, or other findings.

#### Civil cases:

- *Number of civil complaints:* BJS will collect information on the number of open civil human trafficking complaints prosecuted in 2018 by each state attorney general office. BJS will also ask about the number of sex trafficking complaints and the number of labor trafficking complaints. Finally, BJS will ask about how many cases involved adults or minors.
- *How cases were closed:* BJS will ask how many civil trafficking cases were closed by judgment against the defendant, judgment for the defendant, dismissal, or by settlement agreement between the two parties.

#### Criminal and civil cases:

- *Statutes involved in prosecutions:* Some states do not have specific statutes regarding labor trafficking. Attorneys general may charge other statutes in addition to any defined sex trafficking or labor trafficking statutes. BJS will ask the proportion of cases that were charged only with a specific trafficking statute, a trafficking statute with additional state statutes, or only with state statutes other than trafficking. These questions are broken down by sex and labor trafficking and include general descriptions of offenses that may be charged in addition to sex or labor trafficking (e.g., kidnapping, prostitution, and money laundering).
- *Types of venues involved:* Civil and criminal sex and labor trafficking are more likely to occur in certain types of professions or businesses, such as massage parlors, escort services, commercial cleaning services, or landscaping. BJS will collect information on whether these typical locations were sources for civil or criminal sex or labor trafficking cases.
- *Sources of referral:* BJS will collect information on the sources of referral of civil and criminal sex and labor trafficking cases, including health care, law enforcement, and nongovernmental organizations.
- *Characteristics of offenders:* The survey will ask about the types of offenders of criminal and civil human trafficking cases, including individual, businesses (not online), groups of individuals (including organized crime), online website or provider, or subcontractors. The survey will also ask the state attorneys general offices to identify the most common type of offender in the past 12 months.
- *Characteristics of victims:* BJS will ask whether the office handled adult or minor victims of sex and labor trafficking in the past 12 months. The survey will also ask the office to identify the most common type of victim (adult victim of labor trafficking, adult victim of sex trafficking, child victim of labor trafficking, or child victim of sex trafficking). Lastly, BJS asks the types of support services made available to victims of trafficking, including counseling, drug treatment, housing, and legal services.
- *Personnel:* The survey will ask about the number of attorneys on staff, and the number of attorneys who work on human trafficking cases. Additionally, they will be asked to identify whether they have specialists on staff or available as consultants that could assist in human trafficking prosecutions, such as computer forensic analysts, crime analysts, victim service providers, or witness experts.

- *Task forces and training:* The survey will ask about staff training on human trafficking in the past 12 months, or if their office participated in a state, regional, or federal task force regarding any aspect of human trafficking.

### 3. Use of Information Technology

Due to the small number of respondents (56) and being mindful of cost efficiencies, the SSAGO-HT questionnaires will be designed as a fillable PDF file. This allows flexibility for the respondent to complete and return the survey by hand, pass it along to others within the office to complete some sections, and return by mail or fax; or the respondent can complete the fillable PDF, save a copy on their computer and email it back to the Urban Institute for processing. The Urban Institute is the BJS data collection agent with primary responsibility for administering the survey and monitoring the progress of respondents. The cognitive test respondents for the SSAGO-HT reported that they would prefer to complete survey using the fillable PDF rather than a web-based or hardcopy mailed version of the survey.

### 4. Efforts to Identify Duplication

BJS staff reviewed other data collections and the literature to identify duplication. Based on this review, BJS concludes that the SSAGO-HT will provide information that is not available elsewhere.

#### *Related BJS Projects*

BJS has published four reports regarding human trafficking, including one report on the federal government's prosecution of human trafficking cases 2001-2005 and again in 2015, and two reports examining the characteristics of human trafficking suspects and victims through the Human Trafficking Reporting System (HTRS), which was designed to measure the activities of federally funded task forces to address human trafficking. BJS recently published a report on the federal prosecution of human trafficking, although the report only examined cases that included charges under human trafficking statutes; if federal prosecutors chose to use other statutes, such as prostitution or racketeering, BJS did not identify those cases as human trafficking cases.

#### *Non-BJS Studies and Related Projects*

For law enforcement, the FBI's Uniform Crime Reporting (UCR) Program is transitioning from the Summary Reporting System (SRS) to the National Incident-Based Reporting Program (NIBRS). The SRS and NIBRS collect the offense and arrest information on two human trafficking offenses: human trafficking for commercial sex acts and human trafficking for purposes of involuntary servitude. The UCR added these codes in 2013, but agencies have not been consistent in reporting data for them. With the FBI mandating transition to NIBRS by 2021, measures of human trafficking known to federal, state, and local law enforcement agencies could be available. However, NIBRS, by definition, does not collect information on civil offenses.

### 5. Efforts to Minimize Burden

To create data collection forms that collect accurate data, are easy to understand, and impose the least possible burden on respondents, BJS and The Urban Institute sought feedback from experts, comprised of consultants and deputy attorneys general from Colorado, Massachusetts, and

Texas, with experience in human trafficking research, prosecution, and survey design during multiple teleconferences. The first teleconference developed a typology of human trafficking with the consultants, which was later reviewed by deputy state attorneys general during a second teleconference. BJS and the Urban Institute developed a draft survey instrument based on the teleconferences. The consultants then reviewed the draft instrument and provided feedback at a final teleconference. The deputy attorneys general from the three states provided feedback on the questions, and the length of time it took to answer (**Attachment 3**). One territorial attorney general office (Guam) agreed to complete the survey and provided feedback, although the deputy attorney general could not provide feedback in time for inclusion in the pilot report. He did report in September 2018 that Guam had not had any human trafficking cases filed with the territory attorney general for the past 2 years, and as such, the survey only took 10 minutes to complete.

Feedback from the three pilot sites along with the Urban Institute's recommendations for changes based on the cognitive test results resulted in modifications to the survey. BJS and the Urban Institute reached agreement on the final modifications to the questionnaire, resulting in a revised SSAGO-HT instrument (**Attachment 4**). The following changes to the survey instrument were implemented:

- Include calendar year (January 1, 2018-December 31, 2018) rather than “in the past 12 months.”
- Question 3:
  - Change the third response option to “**Victim advocates**”
  - Change the fourth response option to “**Witness experts**”
- Eliminate Question 4
- Divide Question 5 into two separate questions: the first asking about jurisdictional authority for sex trafficking cases, and the other asking about jurisdictional authority for labor trafficking cases.
  - Also, for these two questions, expand the response category (“**Jurisdiction for criminal cases**”) into the following three response categories:
    - “**Original jurisdiction for criminal cases**”
    - “**Concurrent jurisdiction for criminal cases**”
    - “**Jurisdiction (by invitation or permission of local DAs) for criminal cases**”
- For Question 9, reworded the question to ask respondents about the importance of the resources for handling human trafficking cases rather than whether there were any needs for the resources.

- For Questions 11, 12, 13, 15, 16, and 17, change the words “cases filed” to “cases opened”
- For Question 19:
  - Modify the response category “**Promoting or compelling prostitution**” to “**Promoting or compelling prostitution/pimping**”
  - Add the following two response categories:
    - “**Conspiracy**”
    - “**Contributing to the delinquency of a child**”
- Question 21:
  - Change the wording of the question from “**What services are available through your office for victims of labor and sex trafficking?**” to “**What services are available or can be arranged through your office for victims of labor and sex trafficking?**”
  - Add the response category “**Drug treatment centers**”
- Question 22:
  - Modify the response category “**Businesses (not online)**” to “**Businesses (not online, excludes subcontractors)**”
- Questions 24 and 25:
  - Add the response category “**Not applicable (no labor trafficking cases were opened)**”
- For Questions 27 and 29, modify the response categories as follows:
  - Change “**Dismissed**” to “**Case Dismissed**”
  - Change “**Guilty finding**” to “**Guilty finding on any charge**”
  - Change “**Notguilty finding**” to “**Not Guilty finding on all charges**”
- For Questions 28 and 30, modify the response category “**Dismissed**” to “**Case Dismissed**”
- For Questions 31 and 32, dropped the “**Top Three**” most common outcomes of referrals that were not filed as cases.
- Add the following new, open-ended question (which becomes Question 33), and provide a text box for the response:



- 33. “What are the biggest challenges to successfully prosecuting human trafficking cases in your jurisdiction?”

6. Consequences of Less Frequent Collection

The SSAGO-HT is BJS’s first attempt to gather data on the nature and handling of human trafficking offenses and offenders by state systems. Assuming a successful data collection, BJS plans to field the SSAGO-HT on a periodic basis (e.g., every five years), to provide trends in the prosecution of human trafficking over time.

7. Special Circumstances

No special circumstances have been identified for this project.

8. Adherence to 5 CFR 1320.8(d) and Outside Consultations

In the design and development phase of the SSAGO-HT project, BJS and The Urban Institute consulted with substantive experts and prosecutors, including state deputy attorneys general, and academic researchers. These discussions resulted in a consensus on how to define human trafficking, what questions are important to state officials, researchers, and BJS, and the language and terminology that could be understood by respondents.

The following individuals provided valuable information and comments on the content and design of the data collection instrument –

<b>Consultants:</b>	
Dr. Meredith Dank Research Professor John Jay College of Criminal Justice	Ms. Colleen Owens Founder and CEO of The Why: Expert Consultant on Human Trafficking Research
Cindy Lott Columbia Law School Executive Director and Senior Counsel National State Attorneys General Program	
<b>Deputy state attorneys general:</b>	
Janet Drake Senior Assistant Attorney General Special Prosecutions Unit Office of the Colorado Attorney General	Melissa Holman Assistant Attorney General Human Trafficking and Transnational/Organized Crime Unit Office of the Texas Attorney General
Elizabeth Embry Chief of the Criminal Division Office of the Maryland Attorney General	Mallory Myers Assistant Attorney General Human Trafficking and Transnational/Organized Crime Unit Office of the Texas Attorney General
Beth Keely Chief of the Human Trafficking Division Office of the Massachusetts Attorney General	Kirsta Melton Deputy Criminal Chief Human Trafficking and Transnational/Organized Crime Unit

The research under this clearance is consistent with the guidelines in 5 CFR 1320.6. The first 60-day notice for public commentary was published in the Federal Register, Volume 83, Number 151, pages 38,325-38,326 on August 6, 2018 (**Attachment 5**). Six public comments were received from the 60-day notice.

1. The first comment was to clarify the process of submitting comments, but the commenter did not respond or provide any comments.
2. The second comment was a request from the office of the Ohio attorney general to review a copy of the survey. The revised survey was sent, but no comments were received in response.
3. The third comment was from a member of the Indiana Department of Correction's human trafficking advisory committee. The commenter wanted to know if the survey addressed the amount of services available for victims and whether or not these services had waitlists. I provided the commenter the questions on the survey that involved victim services (questions 3, 9, 22, 22a, 23, and 33) and referred her to my colleague in charge of the National Survey of Victims Services Providers. The commenter did not respond.
4. The fourth comment stated support for the survey.
5. The fifth comment stated support for the survey, as long as the survey collected data for the purposes of providing services to victims and not to serve political agendas.
6. The final public comment stated support for the survey, and requested that DOJ and their state work together to "address the serious problems in our current systems regarding child victim witness protection."

No changes were made to the clearance request or instrument based on the feedback received from the 60-day notice.

The 30-day notice for public commentary was published in the Federal Register, Volume 83, Number 203, pages 53110-53111, on October 19, 2018 (**Attachment 6**).

#### 9. Paying Respondents

No payment or gift of any type will be provided to respondents.

#### 10. Assurance of Confidentiality

According to 34U.S.C. 10134, the information gathered in this data collection shall be used only for statistical or research purposes, and shall be gathered in a manner that precludes their use for law enforcement or any purpose relating to a particular individual other than statistical or research purposes. The data collected through the SSAGO-HT represent institutional characteristics of state attorneys general offices and counts of offenses handled by those offices.

Although BJS's confidentiality statute (34U.S.C. 10231) is not being invoked for this collection, the names of the respondents who completed the data collection instrument will be kept confidential. BJS and The Urban Institute will take all precautions to ensure that individuals completing the survey will not be identified.

#### 11. Justification for Sensitive Questions

No personally identifiable information or questions of a sensitive nature will be asked.

**12. Estimate of Respondent Burden**

BJS expects that all 56 respondents will complete the survey. The territory attorneys general are included in the SSAGO-HT. If the territory attorneys general indicate they do not maintain the data necessary to complete the survey, they will be excluded. Territory attorney general offices were excluded from the State and Local White Collar Crime Program because they indicated they did not maintain the data necessary to complete the survey during the pilot phase of the project.

Prior to conducting the cognitive test, the Urban Institute applied for and received Institutional Review Board (IRB) approval for the survey (**Attachment 5**). The three respondents to the initial cognitive test for the SSAGO-HT survey reported a burden of 10 to 35 minutes to complete the survey, for an average burden of 25 minutes. The estimated burden hours are calculated as follows:

<b>Number of respondents for the SSAGO-HT</b>	56 offices
Time to complete the survey instrument by each respondent	25 minutes
Time for respondent to confer with colleagues about survey	5 minutes
Total average burden per respondent	30 minutes
Total burden for all respondents (30 minutes * 56 respondents)/60 minutes	28 hours

**13. Estimate of Respondent’s Cost Burden**

Respondents are expected to incur costs for their time to respond. BJS anticipates that one full-time equivalent per state attorney general survey will complete the instrument, with pay approximately equivalent to the base GS-15/01 level (\$105,123). Based on this assumption, the office cost of employee time would be approximately \$50.54 per hour. The total respondent employee cost burden is estimated at \$1,415.12 for the 28 total burden hours. Fringe benefits costs are estimated to average 46% of the base cost, at \$650.96, resulting in a total salary and benefits cost of \$2,066.08. Indirect costs are estimated to average 37% of the salary and benefits total, or \$764.45, for an overall total respondent cost burden of \$2,830.53.

**14. Costs to Federal Government**

The total expected cost to the federal government for the survey is \$124,401 borne entirely by BJS. This work consists of planning, developing the survey instrument, preparing materials, collecting the data, evaluating the results, and generating reports. A BJS GS-13 statistician will be responsible for overseeing The Urban Institute’s work on this project. The budget for the project is shown below.

<b>Estimated costs for the Survey of State Attorneys General-Human Trafficking</b>			
<b>BJS costs</b>			
	<b>Staff salaries</b>		
	GS-13 Statistician (15%)	\$	14,219
	Senior BJS Management (2%)	\$	2,696

	GS-13 Editor (5%)	\$	4,740
	Other Editorial Staff	\$	500
	Senior BJS Management review of report	\$	1,500
	<i>Subtotal salaries</i>	\$	23,655
	Fringe benefits (28%) of salaries	\$	6,623
	<i>Subtotal: Salary and fringe</i>	\$	30,278
	Other administrative costs (15%)	\$	4,542
	<b>Subtotal: BJS costs</b>	\$	34,820
	<b>Data collector (The Urban Institute)</b>		
	Personnel	\$	25,084
	Fringe benefits	\$	10,613
	Travel	\$	0
	Consultants	\$	18,647
	Supplies	\$	70
	Other	\$	2,440
	Total Indirect	\$	32,727
	Subtotal Data Collection Agent	\$	89,581
	<b>TOTAL ESTIMATED COSTS</b>	\$	<b>124,401</b>

15. Reason for Change in Burden

This is a new collection, so there is no change in burden.

16. Project Schedule

Pending OMB approval, the 2018SSAGO-HT data collection is slated to begin in January 2019 and end April 2019. Once all data are collected, processed and cleaned, final analytical work will begin with plans to issue a BJS report (working title): **State Attorney General Offices' Responses to Human Trafficking, 2018** in 2019.

The project schedule for the SSAGO-HT is outlined below.

<b>Proposed project schedule for data collection</b>			
<b>Date</b>	<b>Stage</b>	<b>Method of Contact</b>	<b>Attachment(s)</b>
Week 1	Initial contact announcing the survey	Mail	8
Week 2	Invitation with fillable .PDF (email) or hard copy (mail) packets	Email to those for whom Ms. Lott has addresses; mail to those for whom Ms. Lott does not have email addresses	4, 9
Week 4	Initial follow-up	Email to nonresponders	10
Week 6	Telephone follow-up	Telephone to nonresponders	11
Weeks 7-9	Targeted follow-up	Email, telephone to nonresponders	12

Week 9	BJS follow-up	Mail, e-mail to nonresponders	13
Weeks 10-16 (Month 4)	Targeted item follow-up	Telephone to incomplete responders	14
Week 12	Last chance packet	Email to nonresponders	15
Week 14 (Month 3.5)	Data collection closes	n/a	n/a
Weeks 4-16	Thank you, after all data validated and incorporated into the file	Email to all responders	16
Weeks 6-20 (end Month 5)	Data processing and analysis	n/a	n/a
Months 6-7	Data documentation and delivery	n/a	n/a
Months 6-9	Reports and data delivered to archives	n/a	n/a

17. Display of OMB number and Expiration Date

The OMB number and expiration date will be shown on the survey form.

18. Exception to the Certificate Statement

Not applicable. This is a new data collection.

Attachments:

1. State Attorneys General Offices Website Review
2. Title 34 USC § 10132
3. SSAGO-HT Cognitive Report with Draft Instrument
4. SSAGO-HT Revised Instrument
5. 60 Day Notice
6. 30 Day Notice
7. IRB Approval
8. Survey Announcement Letter
9. Initial Survey Cover Letter
10. Reminder Email Text
11. Telephone Contacting and Voicemail Script
12. Targeted Telephone Contacting and Voicemail Script
13. BJS Outreach Letter
14. Telephone Retrieval Script
15. Last Chance Email
16. Thank You Email