



August 15, 2019

Katherine Chon  
Office on Trafficking in Persons  
National Advisory Committee Designated Federal Officer  
330 C Street SW, Washington, DC 20201

The National Advisory Committee on the Sex Trafficking of Children & Youth in the United States

RE: Public Comments Addressing the Sex Trafficking of Children & Youth

Dear Ms. McHugh:

The National Foster Care Youth and Alumni Policy Council, the National Council that represents a collective viewpoint of youth and alumni who have personal experience in the foster care system, is pleased to provide comments on addressing the sex trafficking of children and youth with child welfare experience.

The Council advises by:

- Using their experiences in child welfare to identify and inform priorities and offer ideas to improve child welfare policy
- Educating policymakers and other stakeholders about their varied experiences in child welfare
- Analyzing effectiveness of programs and policies based on the experiences of youth in child welfare

Past studies examining the prevalence of sexual abuse among youth in foster care have long shown that youth in care are more vulnerable than their peers in the general population, and the Council's poll had similar findings:

- Over half of the poll respondents indicated being confronted with inappropriate sexual advances prior to entering foster care or while outside of the system

- Almost 40 percent of respondents had been confronted while in foster care
- 20 percent of respondents reported being approached by their foster parent in a sexually inappropriate manner.

If you would like to discuss further, please contact Crys O'Grady, [crys@fostercarealumni.org](mailto:crys@fostercarealumni.org) or (703) 299-6767.

Thank you for the opportunity to submit.

Sincerely,

Crys O'Grady

### **Comments from the National Foster Care Youth and Alumni Policy Council addressing the sex trafficking of children & youth.**

We are pleased that the National Advisory Committee on the Sex Trafficking of Children & Youth in the United States is soliciting feedback on the sex trafficking of children and youth--especially those that have experience in the child welfare system.

As an overarching message, we applaud ACF efforts to engage youth and alumni in shaping the comprehensive response to the sex trafficking of children and youth where federal, state, tribal, and local efforts and hope that ACF will continue to engage young people in elevating current needs, challenges, and successes experienced by youth and alumni in order to lead to better outcomes for children, youth and families served by the child welfare system.

### **Evidence-informed or -based training curricula on identifying exploitation and working with exploited youth (for child welfare providers, child and youth service providers, and foster parents)**

**Recommendation:** With so many youth in care vulnerable to sexual abuse, it is necessary that adults working in the child welfare system ensure that appropriate services are available for youth, and that youth in care know what their resources are and feel empowered to utilize the services available to them.

Foster youth are particularly vulnerable to becoming victims of predators and the sex trade industry due to factors such as a lack of supportive services while in care and

post-care, and psychological vulnerabilities that make them easier to recruit. We must ensure foster youth know that simply being in care can leave them more vulnerable, especially if they run away or age out of the system without finding permanence. Education should be broached in state sponsored youth conventions as well as in Independent Living Programs. Workshops or classes could include topics such as what constitutes sexual harassment, violence or assault, learning about commercial sexual exploitation (sex trafficking) and knowing what to do if one is a bystander or witness to sexual abuse.

**Recommendation: Train foster parents to help them care for vulnerable youth.**

Many youth enter the foster care system having already witnessed or experienced violence in the home and/or inappropriate sexual advances or contact. Education for foster parents should include strategies for helping youth who have been exposed to sexual abuse before entering the system. Topics may include: § Identifying possible physical or behavioral signs that a youth has experienced abuse § Identifying triggers in youth that may be caused by traumatic experiences § Adjusting rules or expectations in the house, such as touching, hugging or making eye-contact, if youth are uncomfortable. Poll results also suggest that foster parent education must be carefully crafted so as not to become a source of “tips” for foster parents who may have bad intentions, resulting in increased vulnerability for youth in care. Foster parent licensure should require training on parenting survivors of CSA and domestic sex trafficking, and training hours must be enforced.

Youth voice: “The change has to start with the foster parents. The conversations about sex have to happen... how to protect yourself during, how to protect yourself against predators when no one is around, the importance of reporting... The genuine open line of communication is what its all about.”

Child welfare policies and procedures for identifying and responding to trafficking

**Recommendation: Provide a youth-friendly resource for reporting abuse.**

Foster youth already experience stigmatization simply by being in the foster care system. Often, they do not report sexual abuse for reasons such as: fear that their foster parents will not like them or want them in their home, fear of getting other foster youth in trouble, learned distrust of the foster system, doubt that adults will believe their story or take action. It is crucial that foster youth have access to a youth friendly, anonymous resource that can help them to take action in the wake of sexual abuse. In addition, youth should be given the opportunity to

report inappropriate sexual activity by being asked regularly if any sexual misconduct has occurred in their foster home or group facility. The council would like to connect with existing support organizations to help them develop and implement training that would allow counselors to better respond to youth in care.

Screening tools used in child welfare agencies (please indicate whether the tool has been validated)

**Recommendation:**

Interagency data sharing agreements that pertain to child sex trafficking cases

**Recommendation: Criminalize the act of allowing known sexual offenders into our foster homes or housing facilities. Enact data-sharing agreements are in place with the Department of Justice and other law enforcement agencies to ensure we are protected.**

Youth in care need to feel that their homes are safe and secure. Foster parents, in turn, need to be held accountable for keeping youth safe to the best of their ability. Knowingly allowing a sex offender into a foster home, group home, or living area of a foster youth should be considered a criminal act punishable by federal law enforcement.

Specialized foster care models

**Recommendation: Require more in-home visits, some of which should be surprise visits.**

Foster care is meant to provide a safe place for youth when their families do not have the means or capability of doing so. Nevertheless, over 20 percent of our poll respondents reported being approached with inappropriate sexual activity by a foster parent. Another 22 percent met the same behavior coming from another youth in the system, such as an older youth in a group home or the adult child of a foster parent. These occurrences are unacceptable, and states may be able to better intervene by enforcing regular home visits from caseworkers. Our focus group pointed out that often adults, besides the foster parents, might reside in the home, although they are not on record as adult residents. Unplanned visits to foster homes may be necessary to discover these situations and help ensure that foster parents are providing a safe and stable home environment for youth.

State and federal non-IV-E funding sources for prevention, training, and/or services

**Recommendation: Provide us with mentors and peer support groups — people we can trust.**

Formal mentoring programs have shown evidence of helping foster youth seek pro-social support and it is important that youth in foster care have access to mentors who have received training on responding to youth who have experienced sexual abuse. Forming a positive relationship with a mentor may also provide a sense of permanency that serves as a protective factor in keeping youth from feeling vulnerable or putting themselves at risk by assenting to dangerous sexual acts as a means of seeking affection and security while in care. Existing programs, such as post-secondary institutes, 4H programs, and other nonprofits, should be incentivized to provide mentoring programs and to incorporate

In closing, the National Foster Care Youth and Alumni Policy Council asks that the National Advisory Committee on the Sex Trafficking of Children & Youth in the United States consider the expertise of young people with lived experience in the child welfare system outlined in this document and continue to seek the expertise of young people to inform their work. Because of the unique experiences of youth in care, they are especially vulnerable to becoming victims of sex trafficking. Including youth voice in policy-making will increase the agency's ability to protect young people from becoming victimized.

Thank you for your time and consideration.

***About the Council:** The National Foster Care Youth and Alumni Council convenes to provide federal stakeholders with relevant and timely information as policies and procedures are created that will affect children and families throughout the country. The Council represents a collective viewpoint of youth and alumni who have personal experience in the child welfare system. The Council is a partnership between Foster Care Alumni of America and FosterClub, with generous support from Casey Family Programs. Visit us online at [www.nationalpolicycouncil.org](http://www.nationalpolicycouncil.org).*