



**United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General**

Office of Inspections

**Inspection of the
Office to Monitor and Combat
Trafficking in Persons**

Report Number ISP-I-12-37, June 2012

Office of Inspector General

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PURPOSE, SCOPE, AND METHODOLOGY OF THE INSPECTION

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2011 by the Council of Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General (OIG) for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

PURPOSE AND SCOPE

The Office of Inspections provides the Secretary of State, the Chairman of the BBG, and Congress with systematic and independent evaluations of the operations of the Department and the BBG. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; whether U.S. interests are being accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; whether instances of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

At the time of this inspection, OIG was engaged in monitoring compliance of the *Audit of the Bureau of East Asian and Pacific Affairs Compliance with Trafficking in Persons Requirements* (AUD/IP-12-02), dated October 2011. The OIG Office of Audits was also engaged in a compliance followup review of the *Performance Evaluation of Department of State Contracts to Assess the Risk of Trafficking in Persons Violations in Four States in the Cooperation Council for the Arab States of the Gulf* (MERO-I-11-06), dated January 2011. OIG, along with other agencies, was asked to testify in November 2011 before the House Committee on Government Reform on issues raised surrounding U.S. Government contracting and the incidence of modern slavery. This inspection has focused solely on the policy office of the Office to Monitor and Combat Trafficking in Persons, and its antitrafficking policy function within the Department, including grants awards and management, and the internal leadership and management of the office itself.

METHODOLOGY

In conducting this inspection, the inspectors reviewed pertinent records; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on-site interviews; and reviewed the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by this review.



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PREFACE

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability, and positive change in the Department of State and the Broadcasting Board of Governors.

This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG and, as appropriate, have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "H. W. Geisel". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Harold W. Geisel
Deputy Inspector General

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Key Judgments

- The Office to Monitor and Combat Trafficking in Persons (J/TIP) has led U.S. Government efforts to significantly raise antitrafficking visibility worldwide and to help countries monitor and combat modern slavery. The J/TIP staff is deeply committed to its mission.
- The tier ranking system of the Trafficking Victims Protection Act (TVPA) of 2000, as amended, is not well understood outside of J/TIP and implementation of the law lacks flexibility, which contributes to differences in interpretation among posts, regional bureaus, and J/TIP. [REDACTED]
- Although J/TIP's working relations within the Department of State (Department) have improved over the past 2 years, thanks to efforts by senior Department leadership, regional bureaus, and J/TIP, fundamental tensions remain. These tensions hinder Department collaboration on antitrafficking goals and contribute to poor resource allocation.
- In executing its interagency coordination mandate, J/TIP has energized and provided needed direction to the interagency Senior Policy Operating Group (SPOG) on trafficking in persons (TIP). It has also led interagency efforts to identify broad antitrafficking objectives and forged interagency collaboration to improve training, awareness, and coordination.
- U.S. grants funding, mostly to assist poor countries making insufficient antitrafficking progress, has been cut significantly at a time when U.S. leadership continues to elevate worldwide trafficking awareness.
- J/TIP has revamped its annual competitive grants review and selection process effectively by linking awards to global antitrafficking assistance priorities and streamlining the process, resulting in an innovative practice worthy of adoption elsewhere.
- J/TIP's current staffing complement allocated to its reports and political affairs (RPA) section is insufficient to accomplish its expanded mission under successive TVPA reauthorizations, especially during the annual report drafting seasons. A combination of management and process changes is necessary to address this issue.
- In the past 2 years, J/TIP's rapid staffing increase, reorganization, and staff turnover have raised leadership and management challenges such as internal communications, work prioritization, resource planning, and training.

All findings and recommendations in this report are based on conditions observed during the on-site review and the standards and policies then in effect. The report does not comment at length on areas where OIG did not identify problems that need to be corrected.

The inspection took place in Washington, DC, between January 9 and February 24, 2012.

(b) (6)


Context

In 2000, Congress mandated the establishment of J/TIP in the TVPA, a comprehensive statute that lays the foundation for wide-ranging U.S. efforts against trafficking.¹ An Executive Order signed in early 2002 and a National Security Presidential Directive in late 2002 provided additional authorities, and the reauthorizations in 2003, 2006, and 2008 modified and strengthened the original act.² J/TIP's major responsibilities include:

- providing staff support for the President's Interagency Task Force (PITF) to Monitor and Combat Trafficking in Persons chaired by the Secretary of State;
- producing within the Department the annual report to Congress on compliance of foreign governments with minimum standards for elimination of human trafficking;
- assessing and ranking countries according to their progress in strengthening their antitrafficking regimes, particularly with respect to prosecution and protection;
- coordinating within the Department and other agencies, assistance to foreign governments in their antitrafficking activities; and
- helping institutionalize whole-of-government and whole-of-agency efforts to combat domestic and international trafficking and helping expand interagency coordination, in particular in the areas of grant-making, research and data, and public affairs.

The Director of the office, who has the title Ambassador at Large, also chairs the interagency SPOG established under the Act.³

J/TIP reached its 10-year anniversary not long before this inspection, which is its second inspection since its creation. Since 2001, successive reauthorizations have added to J/TIP's responsibilities to execute the letter and intent of the law. Moreover, J/TIP's success over the past decade to lead Department efforts to raise international awareness and to oblige countries to strengthen their antitrafficking regimes have increased the quantity and diversity of activities that J/TIP and U.S. embassies together must monitor and assess. Consequently, J/TIP staff has grown from 5 in 2001 to 52 at the time of this inspection.

The Director of the J/TIP office reports to the Under Secretary for Civilian Security, Democracy, and Human Rights. The Secretary of State, who brings her own personal commitment to helping advance antitrafficking objectives globally, looks to J/TIP as the principal vehicle for advancing antitrafficking policy and awareness.

¹ Pub. L. 106-386, Div. A, Oct. 28, 2000, 114 Stat., 1466, codified at Title 22, U.S. Code, secs. 7101-7112.

² Ex. Order No. 13257, President's Interagency Task Force to Monitor and Combat Trafficking in Persons, February 13, 2002, 67 F.R. 7259, as amended; National Security Presidential Directive NSPD-22 (December 16, 2002); Pub. L. 108-193, Dec. 19, 2003, 117 Stat. 2875; Pub. L. 109-164, Jan. 10, 2006, 119 Stat. 3558; Pub. L. 110-457, Dec. 23, 2008, 122 Stat. 5044

³ The SPOG member agencies consist of the Departments of State, Defense, Justice, Labor, Health and Human Services, Education, and Homeland Security; the Office of Management and Budget; the Office of the Director of National Intelligence; and the Agency for International Development. Invited agencies consist of the Departments of Interior, Agriculture, and Transportation, the Federal Bureau of Investigation, and the U.S. Equal Employment Opportunity Commission.

The Department's 10-year effort to advance antitrafficking policy has catapulted the issues to a high profile in U.S. bilateral engagement. J/TIP is responsible for producing the annual public TIP report, as mandated in the TVPA, in close consultation with overseas missions and regional bureaus. The yearly assessment, by law, includes a comparative ranking system for countries based upon the annual report data. Successive J/TIP ambassadors at large and their staffs have followed strictly what the Department has determined the TVPA intended in assessing a country's standing.

The TVPA mandates the use of U.S. sanctions to encourage countries to make yearly progress to strengthen their antitrafficking regimes. Many countries have responded constructively to U.S. Government-determined deficiencies. Yet some countries have resented being publicly low-ranked, arguing that the U.S. Government's annual assessment is flawed and its tier-ranking system subjective. Some have even acted on this pique and threatened counter actions on issues of bilateral national security, trade, and environmental issues of importance to the United States. A few countries simply have refused to consider engaging with the United States on trafficking discussions because they view it as a domestic matter. U.S. embassies charged with advancing a wide range of bilateral objectives, including antitrafficking cooperation, can be caught in the middle.

As a consequence of the TVPA, J/TIP is on one side charged with doing its best to arrive at an objective yearly public assessment and ranking solely of other countries' antitrafficking posture. On the other side are U.S. embassies and their respective regional bureaus, responsible for advancing the full range of bilateral issues, including antitrafficking goals. Since the annual assessment can initially be subject to differing interpretations with respect to antitrafficking progress, bureaus and posts have found it necessary to invest heavily in acquiring trafficking expertise, separate from that of J/TIP, to argue on the merits if they do not agree with J/TIP's conclusions and rankings. Congress continues to stiffen the TIP report's requirements, not only in the periodic reauthorization acts, but also in appropriations acts. Consequently, the potential impact on certain bilateral relationships promises to worsen as automatic tier downgrading mandated by the 2008 TVPA reauthorization forces rankings mechanistically lower.

It is outside the scope of this inspection to recommend legal steps to address this problem. (b) (5)



Internally, J/TIP and the regional bureaus must do their best together to overcome this fundamental tension as they carry out their respective responsibilities.

Executive Direction

J/TIP is led by the Director, a principal deputy director, and a second deputy director. The senior management team includes four senior coordinators responsible for the four areas of J/TIP activity: reports and political affairs, international programs (grants), public engagement, and planning and resource management. The Director has responsibility for both policy direction and overall management of the office; the two deputies supervise two sections each. The principal deputy is responsible for day-to-day management and rates the second deputy.

The current Director is a presidential appointee recognized as an expert in antitrafficking policy. He has prosecuted traffickers for the Department of Justice and served as counsel to the House Committee on the Judiciary with jurisdiction over antitrafficking legislation. He enjoys widespread credibility in foreign capitals, around Washington, and within the J/TIP staff. His principal deputy is a career Civil Service employee with considerable Department experience, including in the Foreign Service.

The OIG team examined three general areas of executive direction: J/TIP's internal management, its engagement with other Department bureaus and overseas posts, and its management of the interagency process as chair of the SPOG.

Internal Management

J/TIP has doubled its staff over the past 6 years and increased it by more than a quarter in the past 2 years. The earlier management structure, which centered on the Director for all J/TIP activities, was inadequate. J/TIP's front office restructured the office in September 2011, by creating a new deputy office director position and four senior coordinator positions below the two deputy office directors. This new structure appears well suited to the expanded office.

The Director has provided broad leadership direction to the office since his arrival in May 2009 but has left most operational management issues to his principal deputy. Despite the reorganization, internal communication from the front office down to individual section officers has been a chronic source of staff frustration. (b) (5)

Both the Director and the principal deputy expressed a desire to improve office communication and are examining mechanisms, such as revamping staff meetings and regular debriefing sessions, to address the problem. The Director has already begun taking steps to ensure that individual officers become familiar with his strategic vision, as set forth in the FY 2013 Bureau Strategic and Resource Plan.

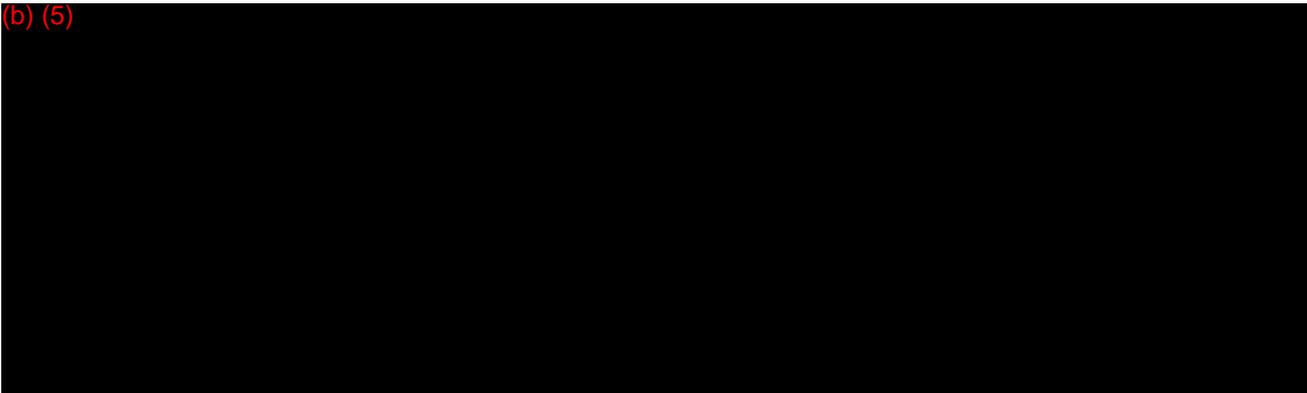
Despite the staff growth and reorganization, the OIG team found that longstanding problems of section workload, particularly in the RPA section, have persisted. The RPA staff has grown modestly since the last inspection, but it still has not kept pace with growth in workload nor heightened tempo, which suggests that the measures taken have not adequately addressed the problem.

Recommendation 1: The Office to Monitor and Combat Trafficking in Persons should develop a staffing plan to reapportion individual reports and political affairs officer responsibilities among the personnel of the office in a manner to prevent individual officer burn out and to prevent untimely staff turnover in the reports and political affairs section. (Action: J/TIP)

Engagement with Other Department Bureaus and Embassies

J/TIP's current collaboration with its regional bureau counterparts and embassies in the field is generally collegial yet reflects in several instances long-standing, underlying strain over how best to advance TVPA-mandated antitrafficking objectives alongside other high-priority foreign relations objectives. Much of this strain is a byproduct of the annual TIP process of producing tier rankings.

(b) (5)



There have been specific procedural actions taken in the past 2 years by Department principals, regional bureaus, and J/TIP that have improved working relations between J/TIP and its other Department counterparts. These actions include operational changes with regard to J/TIP's annual TIP report drafting to improve transparency and to share real-time TIP data with posts. J/TIP has also conducted well-received TIP reporting officer conferences in the field. Bureaus, embassies, and J/TIP agree that these steps have improved collaboration.

J/TIP leadership welcomes improvements in the tone and substance of its relations with bureaus and embassies as long as these do not undermine yearly objective assessment and rankings required under the law. The leadership asserts that J/TIP is the only office capable of producing an independent, objective assessment, and the Department has, as of the date of the inspection, endorsed J/TIP's lead role. Without speaking to the merits of that assertion, this inspection concludes that the Department would benefit from adopting measures described elsewhere in this report that seek to strengthen overall collaboration, to integrate J/TIP more fully into the Department, and to broaden understanding of the Department's antitrafficking objectives among its employees.

Revitalizing the Interagency Process

The Director, in executing his interagency coordination mandate, has energized and provided needed direction to the SPOG. He has led interagency efforts described in the following section of this report to identify broad antitrafficking objectives and forged interagency collaboration to improve training, awareness, and coordination.

Policy and Program Implementation

Interagency and Multilateral Affairs

J/TIP's leadership has steadily helped the SPOG evolve into an improved interagency coordinating body, incorporating 10 cabinet-level agencies and 5 other agencies invited to participate. J/TIP has worked successfully to ensure that agency representation is at an appropriately senior policy level. Over the past 2 years, the SPOG has been an important impetus to help the Department of Homeland Security launch a much-anticipated interagency public session on U.S. Government efforts to provide victim services under the TVPA. J/TIP managed inclusion of the United States in the annual TIP report—a priority mandated by the Secretary of State—in cooperation with SPOG agencies directly responsible for domestic antitrafficking activities. Under J/TIP management, the SPOG has operated a clearing house for international activities and grants to prevent redundancy and to improve interagency awareness.

The SPOG also serves as secretariat for the annual principals' meeting under the PITF. J/TIP has sought to use this meeting, chaired by the Secretary, as a key vehicle to build TIP interagency awareness and commitment. During this inspection, J/TIP staff was assembling the 2011 annual compilation of all agency activities and achievements under 10 broad strategic objectives for public issuance. Participation at the agency principal level in the PITF has reinforced the importance attached by the U.S. Government and encouraged other governments to take concerted action.

Finally, J/TIP has steadily increased its engagement in multilateral fora such as the Organization for Security and Cooperation in Europe, the Organization of American States, and in the various UN agencies to promote strengthening antitrafficking activities and to increase awareness. J/TIP's leadership has overseen this work effectively and with diligence.

Reports and Political Affairs

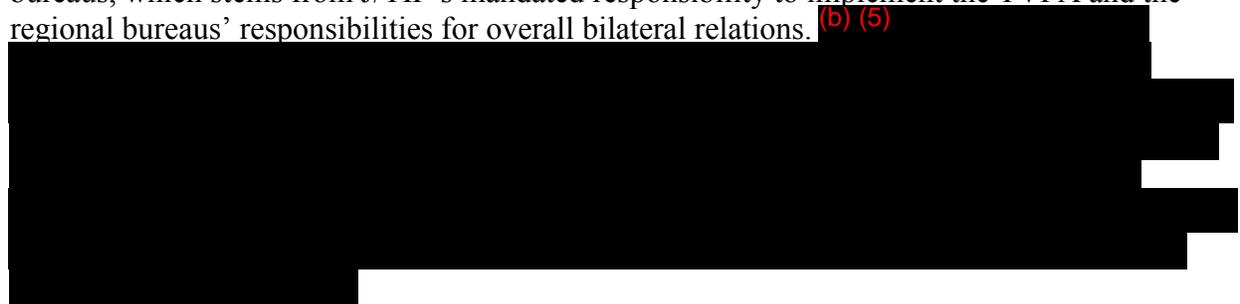
J/TIP's RPA section produces the annual TIP report draft and initially ranks, for Department consideration, all assessed countries into one of four tier categories that measure each country's efforts that year toward combating TIP activities. RPA also engages governments throughout the year through diplomatic outreach and training to help them improve their antitrafficking regimes. After 10 years of publication, the TIP report has gained wide credibility for its thoroughness and is recognized as the definitive work by the antitrafficking community on the status of antitrafficking efforts and a catalyst for change globally.

There is an inherent tension in the Department because the six regional bureaus, which manage broad bilateral relationships, are often at odds with the functional bureaus' and offices' narrow-issue policies. These tensions are reflected in constant negotiations and professional resolutions that are a feature of the U.S. Government and a source of its strength. During the inspection, the regional and other bureaus asserted that the TIP issue was a significantly more contentious policy-formulation process than is the norm. As a result, some regional bureaus assert spending as many resources on TIP issues as on all other global issues combined.

There are three contributing factors to the tension. The first is the TVPA itself, which explicitly mandates significant penalties for countries that do not comply with its provisions. The TVPA also requires annual progress that does not credit past achievements. The year after the previous OIG inspection (2006), the average tier ranking was 2.01. In 2011, the average ranking for the 145 countries that had been ranked all 6 years since was the same, 2.01.⁴

The second factor is that modern slavery and trafficking have been poorly understood and often exist out of sight. Among rank-and-file diplomats, there is still a lack of awareness about modern slavery, TIP, and the requirements of the TVPA. This lack of awareness has resulted in actions by embassies and regional bureaus that have exacerbated their relationships with J/TIP. The bureaus believe J/TIP lacks the country context of embassy and desk officers.

Finally, there is an inherent difference in perspective between J/TIP and the regional bureaus, which stems from J/TIP's mandated responsibility to implement the TVPA and the regional bureaus' responsibilities for overall bilateral relations. (b) (5)



In the past 2 years, the Under Secretary of State for Civilian Security, Democracy, and Human Rights has led an initiative that has significantly improved the TIP reports and tier placement processes.⁵ The first draft of the annual TIP report shared with regional bureaus now uses footnote references to identify the sources of information. SharePoint software is also used to make country-specific information accessible. One result of these efforts is that the number of tier-ranking disputes between the regional bureaus and J/TIP declined from 46 percent of all countries ranked in 2006 to 22 percent of those ranked in 2011.

Within J/TIP's RPA section, the deputy senior coordinator has helped to improve relations with the rest of the Department through better communication and professional engagement. There is widespread acknowledgment that the deputy senior coordinator has made a difference in ameliorating the atmospherics on TIP issues. In addition, bureaus commend several individual RPA personnel for transparency and communication with their regional counterparts.

⁴ The calculation is a simple arithmetic average assigning Tier 1 = 1, Tier 2 = 2, Tier 2 Watch List = 2.5, and Tier 3 = 3. The 145 countries counted were the only ones that remained the same during the 6 years measured, as some dropped off (e.g. Tunisia), some were split (e.g. Serbia and Montenegro), and others were added (e.g. Solomon Islands).

⁵ The Under Secretary for Civilian Security, Democracy, and Human Rights was formerly known as the Under Secretary for Democracy and Global Affairs, also known as "G," but now as "J."

Two areas bear special focus: increasing TIP comprehension and TVPA requirements within the Department and developing procedures that will promote a better working relationship on TIP issues.

The Trafficking-in-Persons Report – Comprehension

The Resource Management section of this report discusses the value of increasing Foreign Service officer participation in J/TIP. Nowhere is that more important than in the RPA section. This report makes a recommendation that two RPA positions be converted to Foreign Service.

Aides to senior Department leaders indicated to the OIG team that they would value being included on a regular basis in important internal J/TIP meetings or broader briefings. During this inspection, J/TIP, on its own volition, extended an open invitation to staff of the Under Secretary for Civilian Security, Democracy, and Human Rights to attend senior staff meetings. J/TIP might also consider, on occasion, scheduling its senior staff meeting in the Harry S Truman building to facilitate selective non-J/TIP participation.

Informal Recommendation 1: The Office to Monitor and Combat Trafficking in Persons should regularly invite senior Department staff officers to informal briefings and seminal meetings and periodically schedule these briefings and meetings in the Harry S Truman building.

U.S. embassies staffs' lack of understanding of TIP complexity contributes to poor collaboration. J/TIP has increased travel and used digital videoconferencing to connect with distant posts. Moreover, J/TIP has held successful TIP reporting conferences in all but one geographical region. One effort with that region was cancelled due to a Department-wide ban on regional conferences for budgetary reasons. A conference in that region would help to spread TIP understanding to key reporting officers.

Informal Recommendation 2: The Office to Monitor and Combat Trafficking in Persons should hold regular trafficking-in-persons reporting conferences, merging them with other more general reporting officer conferences in regional bureaus where the varied responsibilities of the reporting officers so dictate.

Given the growing importance of TIP issues for U.S. diplomacy, other Department officers, including embassy senior managers, who do not have time for lengthy training or conference participation can benefit from TIP training. The Bureau of Consular Affairs developed a distance learning course (PC 406) on the consular role in combating TIP activities and in the October 2010 consular issues cable, encouraged all consular employees to take it. More recently, an OIG report, *Audit of Bureau of East Asian and Pacific Affairs Compliance with Trafficking in Persons Requirements* (Report Number AUD/IP-12-02, October 2011), found that two-thirds of consular personnel surveyed had not been trained. The audit recommended that J/TIP, in consultation with the Foreign Service Institute and the Bureau of Human Resources, expand TIP training to all Department employees. In the following recommendation, the recipients of the training are only those who are responsible for TIP issues both at home and overseas.

Recommendation 2: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Foreign Service Institute, should create a distance learning course on trafficking-in-persons issues and the Department of State's obligations under the Trafficking Victims Protection Act, as amended, targeted for embassy reporting officers, regional bureaus' trafficking-in-persons coordinators, and their superiors. (Action: J/TIP, in coordination with FSI)

Washington briefings for chiefs of missions and their deputies do not always include TIP issues, even though all countries are now covered in the annual TIP report. Considering the increasing resources devoted by the Department to this issue and the potential for bilateral friction that it represents, all chiefs of mission and deputy chiefs of mission need to understand TIP—the TVPA, the yearly report, the impact of tier rankings for their countries and the value of bilateral engagement.

Recommendation 3: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of Human Resources, African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should include specific trafficking-in-persons briefings for all ambassadors and deputy chiefs of mission before they depart for their posts. (Action: J/TIP, in coordination with DGHR, AF, EUR, EAP, NEA, SCA, and WHA)

The Trafficking-in-Persons Report – Process

The fact that the TIP report is closely tied to the language of the TVPA and because the tier ranking could have bilateral repercussions, there is a premium on knowing exactly how to apply the TVPA. In 2007, J/TIP promulgated helpful implementation guidelines for the TVPA in a telegram (2007 State 150188). Even though the TVPA was substantially amended in the 2008 reauthorization, this guidance has not been updated or reissued, in part, because it took almost a year to clear it. Having more up-to-date periodic guidance will improve comprehension and reduce misunderstandings by TIP reporting officers and chiefs of mission in the field.

Recommendation 4: The Office to Monitor and Combat Trafficking in Persons should update the implementation guidelines for the minimum standards to reflect the latest language of the Trafficking Victims Protection Act and plan to reissue the updated guidelines annually. (Action: J/TIP)

J/TIP sends a worldwide telegram each December to embassies to request TIP data for use in the TIP report. Concurrently, J/TIP contacts organizations outside of the U.S. Government requesting the same information. Between mid-February and the end of March, J/TIP drafts TIP country summaries and proposed tier rankings drawing on these embassy and non-U.S. Government submissions. Embassies eventually see the non-U.S. Government submissions, but often not until they have already submitted their data inputs to J/TIP. If embassies are able to view the other data before they submit their cable, they can use it to inform their own reports and clarify potential differences early in the process.

Recommendation 5: The Office to Monitor and Combat Trafficking in Persons should implement a plan to gather non-U.S. Government trafficking-in-persons data on countries and share it with the appropriate U.S. embassy well before the due date of the embassy's submission of the Trafficking-In-Persons report data call. (Action: J/TIP)

The TIP report is drafted in February and March each year and then cleared by the Office of the Legal Adviser and J/TIP's Director in early to mid-April. It is only at this point that country narratives are shared with regional bureaus and embassies and a process of resolving disagreements begins. Regional bureaus and embassies are sometimes surprised at information in the report that does not reflect their understanding of events in their countries. With a statutory deadline of June 1 to publish the TIP report, the rush to resolve misunderstandings and disagreements increases tensions. The OIG team believes that, if J/TIP were to share the draft reports earlier, it would allow more time for embassies to resolve potential areas of misunderstanding or inaccuracy. J/TIP informed the OIG team that it intends in the 2012 cycle to begin marking their first (fully cleared) version of the report as a "draft." The OIG team endorses this initiative.

Recommendation 6: The Office to Monitor and Combat Trafficking in Persons should revise current practices for drafting the Trafficking-In-Persons report in order to share a draft of the country narrative as early as practical with the concerned U.S. embassy and regional bureau. (Action: J/TIP)

The Department produces many mandated reports, but the TIP report is exceptional in that the initial draft is written in Washington, not in the field. (b) (5)

[REDACTED]

[REDACTED] TIP report drafting responsibility was the subject of past decision memoranda early on after the formation of the TIP office and even in much more recent informal discussions. Ultimately, the Department has chosen to leave drafting responsibility with J/TIP.

The OIG team appreciates the careful examination that the Department has undertaken regarding drafting responsibilities. However, the OIG team suggests that the Department consider a modest embassy drafting pilot program. A pilot program, under J/TIP direction, could evaluate an embassy's competence in drafting consistent with TVPA strictures, offer alternatives to J/TIP to have selected embassies drafting, alleviate J/TIP workload, and strengthen a collaborative spirit with regional bureaus.

The comprehensive and definitive TIP report has understandably grown in size and length, now covering 184 countries, addressing antitrafficking issues, and praising individual and nongovernmental organization contributions. While the overall report is impressive, publishing the 336 pages of country narratives is wasteful. Executive Order 13589 encouraged agencies to limit the publication and printing of hard copy documents and to presume that information should be provided in an electronic form. The 2011 TIP report was published in two versions,

one with all the country narratives (412 pages) and another with just the introductory materials (72 pages). The short version is sufficient for hard copies.

Recommendation 7: The Office to Monitor and Combat Trafficking in Persons should cease publishing in hard copy the country narratives of the Trafficking-in-Persons report. (Action: J/TIP)

The Trafficking-in-Persons Report – Other Issues

Action Plans

The TIP report contains a list of recommendations for each country. Because the TVPA requires appreciable progress each year to maintain a ranking, and because countries on the Tier 2 Watch List for more than 2 consecutive years must create a written plan to avoid being downgraded to Tier 3, the recommendations can be a blueprint to tier improvement. While J/TIP has produced action plans to share with foreign governments based on its TIP report recommendations, this task could be performed by embassy staff, in close consultation with J/TIP, to facilitate greater ownership of the process in their countries and to focus embassy attention on TIP issues midway through the TIP report cycle.

Recommendation 8: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should task U.S. embassies to develop action plans for their countries drawing from Trafficking-in-Persons report narrative recommendations. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Interim Reports

The 2003 reauthorization of the TVPA created a special watch list and tasked the Secretary of State with reporting by February 1 of each year, an assessment of the interim progress of the watch list countries since the previous TIP report. In the past, J/TIP has drafted the interim reports, which normally are comprised of a few paragraphs. Having the embassies draft the interim reports, in close consultation with J/TIP, would strengthen their involvement in TIP issues, and help embassies move smoothly from the TIP report to the action plan to the next TIP report cycle.

Recommendation 9: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should task U.S. embassies to draft the interim reports for the countries on the Tier 2 Watch List, subject to Office to Monitor and Combat Trafficking in Persons concurrence with the draft. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Forced Labor

In 2011, the Secretary of State approved an interpretation of the term “trafficking in persons” that includes forced labor—an interpretation that J/TIP had traditionally used when drafting the TIP report. The policy also allows the Bureau of Democracy, Human Rights, and Labor to continue to focus on addressing forced labor without necessarily addressing other TIP issues.

The dichotomy is reflected in the Department’s annual Human Rights report, in the forced labor subsection of Section 7, which deals with forced labor for each country. In places where the Human Rights report addresses forced labor issues, the report provides a link to the TIP report. In one country, for example, the 2010 Human Rights report states that, “...there were no credible reports of forced labor.” The corresponding TIP report notes an extensive problem with forced labor in the same country. These inconsistent accounts can confuse readers and undermine the integrity of the Department’s published reports.

Recommendation 10: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Democracy, Human Rights, and Labor, should review and strengthen the current coordination mechanism to ensure that issues that intersect forced labor and human trafficking in the Department of State’s annual reports are consistent. (Action: J/TIP, in coordination with DRL)

Awards

It is Department policy, in 3 Foreign Affairs Manual (FAM) 4812, to encourage participation in improving U.S. Government operations. To that end, the Department’s awards program recognizes employees for performance, efforts, and performing special acts or services. The Department has established annual awards for excellence in many programs such as international economic performance, success in trade development, and commitment to peace and alleviation of human suffering.⁶ There is no award, however, for outstanding achievements in combating trafficking in persons. The United States has made a strong commitment to eradicate trafficking in persons. Department officers take initiative, accept risks, and perform skillfully to advance U.S. antitrafficking interests, particularly abroad. The Department’s awards program offers an opportunity to recognize those officers who have significantly advanced the U.S. Government’s antitrafficking objectives.

Recommendation 11: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should establish an annual award recognizing a Department employee for outstanding achievement in combating trafficking in persons. (Action: J/TIP, in coordination with DGHR)

⁶ See 3 FAM 4831- 4837.

International Programs

J/TIP links its antitrafficking foreign assistance to the annual TIP report: priority countries are drawn from those ranked as Tier 3, Tier 2 watch list, and Tier 2 countries whose governments have the will to improve their response to trafficking but lack resources to do so. In 2011, J/TIP designated 34 countries and three subregions for priority funding, based on the 2010 report's rankings, current antitrafficking programming, and consultations with other offices in the Department. This section of the inspection report addresses the programmatic aspect of the section's grants. The Grants Management section of the inspection report reviews J/TIP's technical grants procedures.

The international programs section includes a senior coordinator, a deputy senior coordinator, six program officers, and two contractors. While section members are committed to the J/TIP mission, excessive work hours, cramped (b) (5)

Recently the section has become short-handed due to two vacancies, but the replacement staff members are expected to begin work shortly. During the inspection, the long time senior coordinator, an internationally recognized expert, transitioned as planned to new duties to become a senior advisor to the J/TIP Director. She has not yet been replaced, leaving day-to-day supervision to the competent deputy coordinator, who has recently been appointed acting senior coordinator.

The section's workload is heavy. Some program officers now manage more than 40 grants each located in many different countries. The staff consensus is that 25 to 30 grants per officer are a more reasonable workload. The unit monitored 168 active grants in 68 countries and two special areas (Caribbean and Pacific Islands), totaling nearly \$64.2 million as of October 2011. In addition, program officers evaluate hundreds of statements of interest (SOI) for new grants each year.

J/TIP's foreign assistance comes entirely from International Narcotics Control and Law Enforcement (INCLE) funds. Economic Support Fund resources, which accounted for the bulk of J/TIP's foreign assistance budget at the time of the 2006 inspection, stopped after FY 2010, in part because J/TIP determined that the Economic Support Fund interagency transfer process often delayed disbursements. The 24 percent drop in appropriated program funds, from \$21.3 million in FY 2010 to \$16.3 million in FY 2011, has reduced J/TIP's ability to help poor countries with the will to improve but without adequate resources to make antitrafficking progress. Ironically, this could result in lower tier ratings for some and increase the risk of being sanctioned. In FY 2012, J/TIP asked for \$20.8 million in grants, but this level has not yet been approved.

Presented below is an illustrative, but not exhaustive, list of J/TIP grants in FY 2011.

- Zambia: provide training to investigate and prosecute traffickers and support government shelters for victims;
- Philippines: improve local justice system to respond to sex trafficking;
- Solomon Islands: develop data collection system on TIP cases for reporting, referrals, and prosecutions, and engage in an anti-TIP public awareness campaign;

- Turkey: assist government to establish standard operating procedures for the identification and referral of trafficking victims;
- Bangladesh: support government efforts to reduce labor trafficking;
- Mexico: provide technical assistance on victim protection and increased regional and national antitrafficking networks;
- Global: increase capacity of the UN Office of Drugs and Crime to implement the Palermo Protocol (the UN Antitrafficking Convention);
- Research: conduct research to understand the health needs of labor trafficking victims.

Grants Review Process

The 2006 inspection recommended that J/TIP “should submit grant proposals and reports to a rigorous peer review when awarding grants to groups with which embassies and geographic bureaus are not familiar or comfortable.” J/TIP has made strides in this area. It allocates its antitrafficking foreign assistance as a result of an annual open and competitive two-stage peer review process. J/TIP begins by soliciting two-page SOIs from U.S.-based and foreign nonprofit organizations, nongovernmental organizations (NGO), public international organizations, and universities. For-profit organizations are also eligible, but may not generate a profit from grants-funded activities. NGOs have complimented this process for its efficiency and for permitting them and J/TIP to suggest more project ideas for consideration.

The review process involves coordination between J/TIP and the regional bureaus; the Bureau of International Narcotics and Law Enforcement Affairs; the Bureau of Democracy, Human Rights, and Labor; the Bureau of Population, Refugees and Migration; overseas missions and Washington offices of the U.S. Agency for International Development; and U.S. embassies. Interagency partners may include the Departments of Homeland Security, Justice, Labor, and Health and Human Services.

In the first stage of the process, SOIs are screened to see whether they meet technical requirements in the solicitation. Those passing technical review are evaluated by knowledgeable officials with area expertise. Highly rated applicants are then invited to submit full proposals that expand on their submissions. During the final stage of the process, proposals are competitively reviewed by the embassy in the concerned country as well as by an interagency antitrafficking experts panel. The J/TIP Director reviews the results and passes his recommendations to the Director of U.S. Foreign Assistance who gives final approval. Congressional notification must take place before grants are awarded. Grants awards cannot exceed \$750,000, and projects can run up to 36 months. U.S.-based NGOs and public international organizations each implement approximately one-third of the grants, foreign NGOs implement approximately 20 percent, and universities approximately 5 percent.

Each year J/TIP uses lessons learned to make changes to streamline and improve its grants award process, which is favorably regarded by potential grantees. For instance, the international programs unit hosts a “Bidders Conference” for potential applicants in Washington to kick off the solicitation period, explain the review process, and answer questions. The results are posted on the J/TIP Web site. In 2011, there was a further refinement: a Web chat with questions from embassies and NGOs around the world.

Competition for grants is fierce. In FY 2011, J/TIP received 429 SOIs for proposed projects in 83 countries totaling \$234.4 million. At the conclusion of the interagency review, 69 grants were awarded to 43 organizations in 37 countries totaling \$24 million. This amount included \$4.5 million in funds especially appropriated for antitrafficking projects in post-earthquake Haiti and approximately \$3 million in FY 2010 funds allocated primarily for projects in India and Afghanistan.

Innovative Practice: Grants Review Process

Innovative Practice: Grants Review Process

Issue: Each year it is a challenge for J/TIP to review hundreds of antitrafficking grants proposals expeditiously so that awards may be made before the end of the fiscal year.

Response: The grants process has been broken down into two stages. In response to an annual solicitation, grants applicants submit a two-page statement of interest. Antitrafficking experts in the Department, other agencies and embassies review them to select those most responsive to U.S. Government antitrafficking priorities. Those selected are invited to submit full proposals, which are again reviewed by experts and embassies. Final selections are made from a much smaller group of applicants. The two-stage process allows faster awards than before.

Result: J/TIP conducts the grants selection process in a predictable, fair, transparent, and systematic manner. All relevant U.S. Government offices, agencies, and embassies participate. J/TIP solicits full proposals only from applicants whose statements of interest meet technical standards and are responsive to U.S. antitrafficking priorities, thus eliminating full blown grant proposal submissions by unsuccessful applicants. Grants awards are now made before the end of the fiscal year. Those seeking grants praise this innovative two-stage process.

Other Department offices and U.S. agencies, including the Bureau of International Narcotics and Law Enforcement Affairs, the Bureau of Democracy, Human Rights, and Labor, the Bureau of Population, Refugees and Migration, the U.S. Agency for International Development, and the Department of Labor, also provide foreign antitrafficking assistance. Information on proposed antitrafficking grants is circulated via listserv by the SPOG secretariat. There is a 7 business day comment period during which agencies may provide views on whether a proposed grant would duplicate existing or planned grants and on opportunities for partnership and collaboration with their agency's programs. The system appears to work well, enhancing transparency and coordination.

Managing Workloads

The peak workload in the international programs section coincides closely with the period of heaviest activity in the RPA section. This overlap effectively prevents personnel in one unit from helping the other. The grants review timeline is currently designed to allow grants awards by the end of the fiscal year in September. Bearing this timing in mind, J/TIP solicits grant proposals in late October, early in the fiscal year. SOIs from applicants are due a month later, after which they are rank-ordered by embassies. The technical review of the SOIs takes

place in February and selected potential grantees are invited to submit full grant proposals by mid-April. The J/TIP Director makes final decisions in May. J/TIP awards grants from July to September so that projects may start at the beginning of the next fiscal year in October. Thus the unit experiences three periods of intensive work: in January when SOIs are reviewed; in April when full proposals are reviewed; and in July-September when proposals to be funded are finalized and prepared for awarding. RPA works most intensively during the spring drafting of the annual TIP report in order to meet the congressionally mandated issuance date at the end of June. The OIG team recognizes that this schedule offers little opportunity with current resources and personnel to reduce per officer workload, particularly during this peak period.

A universal staff complaint is the unrelenting workload on program officers. At present, J/TIP accepts SOIs for grants in all countries, including Tier 1 countries, despite signaling to applicants that J/TIP is most likely to select proposals in the named priority countries. Explicitly limiting SOIs to priority countries in the solicitation would reduce the number of SOIs examined by J/TIP, embassies, and other Department offices and agencies, and could alleviate the proposal review workload.

Recommendation 12: The Office to Monitor and Combat Trafficking in Persons should explicitly limit the statements of interest received in response to the solicitation of grants proposals to those destined for priority countries identified in the annual Trafficking-in-Persons report. (Action: J/TIP)

Grants Priorities

In addition to being directed toward priority countries identified in the annual TIP report, J/TIP grants are guided by the 2000 TVPA, which covers prosecution of traffickers, protection of victims, prevention of trafficking, and development of partnerships. J/TIP funds programs in all four areas:

- 90 percent of current projects include a protection component and 61 percent provide direct services to victims;
- 52 percent build capacity of local law enforcement and prosecutors to apprehend and prosecute traffickers;
- 91 percent of prevention programs include victim protection activities; and
- 74 percent focus on both labor and sex trafficking to ensure a comprehensive response to all forms of trafficking.

Examples of J/TIP-funded projects include: providing technical support and training to law enforcement, including prosecutors and judges, in investigating and prosecuting trafficking cases; building cooperation between NGOs and government agencies; improving practices and policies for law enforcement, immigration, and other agencies to identify and assist trafficking victims; developing or improving services to trafficking victims so that they are treated with respect rather than as illegal aliens or criminals subject to detention or deportation; providing expertise to draft or improve antitrafficking legislation and its implementation; and supporting prevention activities to reduce the demand for sex trafficking or slavery-produced goods.

Grants Effectiveness

Even as the number of antitrafficking programs grows, there is little empirical research to guide practice and inform policy. Few programs have been rigorously evaluated. In a time of budget constraints, research and evaluation of programs will help increase program effectiveness and target scarce resources efficiently. J/TIP has taken steps to evaluate programs that demonstrate aid effectiveness and deliver tangible results from its antitrafficking efforts. Program evaluation and performance measurement are key components of its strategy. J/TIP's three-pronged approach to monitor and assess program effectiveness requires funded programs to use a logical framework with suggested performance indicators; increases on-site monitoring of program implementation and financial management; and funds impact assessments.

To promote sound project design, J/TIP requires applicants to submit a logical framework that demonstrates the relationship between proposal goals and objectives and includes performance measurement indicators for outputs and outcomes of each objective. J/TIP developed a fact sheet to explain how to develop the framework and standardized on-site reviews of funded projects to assess fiscal and administrative management and programmatic progress and effectiveness. Even though J/TIP reviewed 44 projects in FY 2010 to ensure quality programming, the international programs staff is too few in number to visit all projects regularly.

Research and Evaluation

The 2006 inspection recommended that J/TIP should assign more staff hours to determining what research the U.S. Government needs, mining research for best practices, disseminating those best practices with other agencies and posts, and integrating those best practices into antitrafficking programs. In response, J/TIP increased its work in the research and evaluation field. In FY 2008, it funded evaluations of antitrafficking programs in five geographic areas. Programs were visited on-site and evaluated on the basis of soundness of the project design, potential replication of activities, measurement of effectiveness, and whether data is available to determine impact. The assessments gave grantees technical assistance to improve program implementation and data collection. J/TIP undertook similar process evaluations in FYs 2010 and 2011. Several J/TIP-funded programs are highlighted as "promising practices" in a forthcoming report from the SPOG Grant Making Committee

During the last decade, there has been a sharp increase in journal articles, reports, and books on trafficking. Most are descriptive and are usually not based on empirical research or peer reviewed. Consequently, J/TIP increased its support of evidence-based research, including the Global Database on Human Trafficking, to identify trends and inform policy and practice. Data from 16,500 victims in more than 100 countries collected over a 10-year period showed more trafficking of males, an older victim population, and how traffickers are changing their methods. There is a lack of research evaluating countries that have institutionalized a successful antitrafficking framework from investigating and successfully prosecuting traffickers to protecting victims. J/TIP is funding case studies in Europe, Asia, and Latin America to identify best practices in developing a successful national program that will be the basis of a handbook.

Public Engagement

The public engagement section supports the SPOG, including the annual PITF chaired by the Secretary; manages congressional relations; supports partnerships with civil society and the private sector to encourage the adoption of codes of conduct and commodity and supply-chain monitoring; and provides clerical support to the J/TIP deputy. It also discharges traditional public diplomacy functions, including speechwriting for the Director, preparing daily press clips, and maintaining the Internet and two intranet sites. Its staff includes 11 personnel led by a senior coordinator.

The public engagement section follows a strategy in coordination with the Bureau of Public Affairs. This strategy includes integrating, in coordination with the RPA section, TIP issues into senior Department policymakers' talking points, briefing books, and speeches for domestic and overseas events. In discussions with senior Department officials during the survey portion of this inspection, the OIG team confirmed that Department officials are raising key TIP points in meetings with foreign officials as well as in public remarks domestically and overseas. J/TIP reports that it has had limited success in getting public affairs sections in U.S. embassies to agree to joint media outreach efforts such as digital videoconference briefings of local journalists by J/TIP staff.

The Director and other senior J/TIP staff share a heavy schedule of speaking engagements. The senior coordinator participates in a regularly scheduled convening committee chaired by the Director, which vets speaker requests by selecting opportunities based upon J/TIP's outreach strategy designed by the public engagement section, the J/TIP Bureau Strategic and Resource Plan goals, and the availability of speakers.

Along with preparations for the PITF annual meeting chaired by the Secretary, the TIP report annual roll out in June is one of two major public engagement undertakings during the year. J/TIP works closely with the Bureau of Public Affairs in orchestrating events surrounding the roll out, including follow-on media events. The Secretary introduced the 2011 TIP report to an audience of over 400 foreign diplomats, federal agency TIP experts, NGO representatives, members of Congress and their staff, and the media. Special guests included an international contingent of the 10 antitrafficking heroes nominated by U.S. embassies. J/TIP coordinates the roll out with U.S. missions overseas to maximize local media coverage in host countries. It also arranges digital videoconferences and other media devices to engage foreign audiences.

Throughout the year, the public engagement section, working with the Director and other senior J/TIP staff, stages Web chats, social media, blogs, and digital videoconferences to promote TIP awareness. In addition to electronic media, J/TIP places articles and editorial page opinions in traditional print media and broadcast media. For example, the public engagement section staff has developed media contacts to get the message out to mass audiences in the United States and abroad, which often takes months to implement. The staff has developed good relationships with broadcast media such as the producers of the Cable News Network's Freedom Project and with outlets including MSNBC, Al Jazeera English, and a range of local media sources.

One highly successful initiative has been the Slavery Footprint, an online and mobile survey and application created by a nonprofit organization in collaboration with J/TIP. Launched in 2010, it has proven to be among J/TIP's most effective public awareness building tools both domestically and overseas. It has also attracted private sector financial support. It enables consumers to quantify the estimated forced labor involved in supporting their lifestyles based on their consumer product choices.⁷ Survey takers interactively can alter their purchase choices and reduce the impact of modern slavery. The creators of the survey and application originally estimated reaching the 150,000 user milestone by September 2012. By the time of this inspection, Slavery Footprint had recorded over 2 million user views from over 100 countries.

The public engagement section conducts trainings and foreign visitor briefings in cooperation with the International Visitor Leadership Program (IVLP) of the Bureau of Educational and Cultural Affairs. TIP-focused IVLPs have become a regular program occurrence—including regional IVLPs on TIP – that entail traveling to other U.S. cities to see best practices face-to-face. Indeed, under the IVLP, U.S. officials at the federal, state, and local levels continue to provide briefings to emerging foreign leaders and government officials with responsibilities related to TIP. The OIG team commends this collaboration between J/TIP and the Bureau of Educational and Cultural Affairs to advance this foreign policy and civil society goal.

Section members also conduct other Department, domestic, or overseas training either alone or in coordination with the Foreign Service Institute, international organizations, NGOs, and federal agencies such as the Department of Homeland Security.

Donors and Public-Private Partnerships

Private sector enterprises or foundations are increasingly interested in making funds available for antitrafficking activities as a result of J/TIP's efforts to raise awareness. Others look to J/TIP to assist them in funding activities that further the antitrafficking mission. J/TIP and other offices in the Department are well positioned to serve as brokers or conveners to build partnerships among those with willing resources and NGOs active in combating modern slavery. There are many types of public-private partnerships and the Department has ample guidance.⁸ Alternatively, J/TIP can both solicit and program private funds for foreign assistance purposes using existing Department authorities.⁹

Recommendation 13: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Resource Management, the Office of Global Partnership Initiatives, the Office of the Legal Adviser, and the Bureau of International Narcotics and Law Enforcement Affairs should implement a plan to partner with private sector potential donors or partners, consistent with existing Department authorities. (Action: J/TIP, in coordination with RM, S/GPI, L, and INL)

⁷ <http://www.slaveryfootprint.org>

⁸ Policy Framework and Legal Guidelines for Partnerships, U.S. Department of State, February 2011.

⁹ State Basic Authorities Act of 1956, as amended, Section 25; 22 USC 2697, Acceptance of gifts on behalf of the United States; Foreign Assistance Act of 1961, as amended, (Pub. Law 87-195), Section 635(d); 2 FAM 960 through 2 FAM 962; and 4 FAM 380.

The public engagement section works with corporations to promote the understanding of corporate codes of conduct such as the Luxor Protocol for implementation of the Athens Ethical Principles, and the responsibility of corporations to monitor their supply chains. The section foresees this activity as a growing part of its workload, including coordination with the corporate social responsibility team of the Bureau of Economic and Business Affairs, as U.S. and multinational corporations, associations, and legislators show increased interest.

Among its notable efforts and successes, the public engagement section helped the Department of Homeland Security, through a SPOG working group, launch two online interactive training modules, one for the general public and the other for all federal acquisitions professionals aimed at the zero tolerance policy in government contracting. The section also worked with the Bureau of Educational and Cultural Affairs to incorporate trafficking-prevention components among the measures taken to revamp the Summer Work Travel program. The section has also worked with the protocol office to better track allegations of abuse and establish requirements for the treatment of domestic workers of foreign diplomats in the United States to help prevent TIP abuses.

Public Awareness and Prevention

The 3Ps paradigm of prevention, protection, and prosecution is a fundamental framework in efforts against modern slavery. The 2011 TIP report and the J/TIP Web site note that, historically, prevention efforts focused on public awareness campaigns. The FY 2013 Bureau Strategic and Resource Plan (goal number 3) seeks to advance the prevention goal by developing and implementing specific public outreach strategies. Likewise, goal number 4, to promote interagency cooperation, lists the intention of J/TIP staff support for the PITF to include “measuring and evaluating progress of the USG and other countries in...prevention through public awareness.”¹⁰ Yet J/TIP believes measuring prevention success from public outreach activities is difficult and resource intensive, especially to establish a causal link between an awareness program or intervention and a set of prevention outcomes. The Bureau Strategic and Resource Plan reflects that belief by using activities or outputs as measures rather than results or outcomes. J/TIP staff could not answer, on the basis of metrics, the question, “How do you know how effective you have been from awareness campaigns?” The Director, in public remarks, has acknowledged that prevention is seen as the weakest of the 3Ps with respect to evaluation.

J/TIP has robust measures of quantifiable outcomes from prosecution and protection. Quantified measures of U.S. prevention are harder to find, but can be developed. For example, the National Human Trafficking Resource Center 24-hour hotline tracks the number of telephone calls by individuals who identify the *Know Your Rights* pamphlet, which is distributed to certain individuals who apply for a U.S. visa, as the source of their hotline awareness. That pamphlet was created in coordination with the Bureau of Consular Affairs, other federal agencies, and NGOs as a result of passage of the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008.¹¹ The public engagement section already uses a media impressions

¹⁰ Office to Monitor and Combat Trafficking in Persons, FY 2013 Bureau Strategic and Resource Plan, p. 17.

¹¹ Pub. L. 110-457, Section 202.

formula as a broad measure of the audience exposed to mentions of J/TIP or the TIP report. “Media impressions” is a standardized Department public diplomacy measure that reflects exposure and awareness, but by itself is not a reliable measure of trafficking being prevented. This type of measure, however, can be combined with other statistics to estimate an impact on prevention.

Recommendation 14: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should develop additional performance metrics that capture the prevention or other related gains from various antitrafficking awareness activities and other related programs or legislation. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Senior Policy Operating Group Support

As the TVPA intended, J/TIP’s Director has chaired for a decade the principal interagency mechanism on U.S. antitrafficking cooperation and coordination, the SPOG. Supported by the SPOG, the PITF has met yearly at the principals’ level heightening awareness and showcasing the wide range of U.S. Government antitrafficking activities. A three-person unit of the public engagement section provides support to J/TIP’s interagency role as coordinator of the SPOG, which meets quarterly. This capacity and the Director’s leadership have been key elements in expanding the SPOG’s agenda and effectiveness. The unit operates as the secretariat for the SPOG. As J/TIP’s subject matter expert on TIP in the United States, the unit drafts the U.S. narrative to the TIP report and fields questions about the U.S. experience and statistics from other countries as forwarded by U.S. embassies. The unit also handles non-SPOG interagency initiatives and communication. Members of the SPOG support unit and other members of the public engagement section cochair the various SPOG working level committees, including the SPOG public affairs committee and the research and data committee, and provide other support to those committees.

Congressional Liaison

By passing the TVPA, Congress made clear its interest in TIP policy and J/TIP’s progress in implementing the TVPA’s mandate. Consequently, J/TIP is properly sensitive to congressional interest and concerns. The public engagement section currently engages two employees who give part-time support to the congressional liaison function, in addition to their other portfolios. As necessary, other J/TIP staff, such as the Director’s speech writer or relevant subject matter experts in other sections, may be called upon to prepare congressional testimony or responses to congressional interrogatories. The incoming team leader, who has worked most recently as a congressional staff person, will strengthen the office’s capacity to manage congressional relations.

Resource Management

Financial and Human Resources

J/TIP FY 2012 Staffing

U.S. Domestic Staff	Foreign Service	Civil Service	Contractors	Part-Time	Detailees	Students/ Interns	Total
	2	37	7	2	1	3*	52 ¹²

*J/TIP normally has 3 interns per quarter.

Note: J/TIP does not have overseas staff.

J/TIP FY 2012 Funding

Description	Amount
Diplomatic and Consular Programs	\$3,000,000
International Narcotics Control and Law Enforcement (INCLE)	\$16,233,000
American salaries (not controlled by J/TIP)	\$4,000,000

Staffing

From FY 2009 to FY 2010, J/TIP staff increased 27 percent (from 38 to 52) and nearly 50 percent (from 27 to 52) since late 2005 as its mandate under law and workload has grown. The senior coordinator for resource management and planning (RMP) has worked with J/TIP leadership to determine how best to allocate new personnel. Recommendation 1 in the Executive Direction section notes one area of staffing focus that needs attention.

Unlike comparable bureaus or independent offices, J/TIP’s staff is composed almost entirely of Civil Service employees or contractors hired directly into the J/TIP office. Two positions are currently designated Foreign Service. A few J/TIP staff members have served in U.S. embassies but most lack the actual embassy experience overseas or in diverse bureau assignments within the Department that is typical of career Foreign Service personnel. Their lack of experience limits J/TIP’s knowledge of the way embassy staffs engage host country governments and civil societies. Discussion with J/TIP leadership suggests that J/TIP sees value in and welcomes additional Foreign Service participation in the office. J/TIP notes that it has sought without success to address this Foreign Service Civil Service employee imbalance, as noted in the 2005 inspection report and in its yearly Bureau Strategic and Resource Plan exercise.

Recommendation 15: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should request, and the Bureau of Human

¹²This number represents “on board” staffing as opposed to authorized positions. The 52 total includes a waiver from the Bureau of Human Resources for 1 Civil Service position and 1 Foreign Service position.

Resources should fill, the next two new full-time equivalent positions, if granted, with Foreign Service officers. (Action: J/TIP, in coordination with DGHR)

Recommendation 16: The Office to Monitor and Combat Trafficking in Persons should request reprogramming of the next vacant position in the reports and political affairs section and the next vacant position in the public engagement section from Civil Service to Foreign Service, and the Bureau of Human Resources should approve the request. (Action: J/TIP, in coordination with DGHR)

Recommendation 17: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should request, and the Bureau of Human Resources should approve, reprogramming position S8403506 in the reports and political affairs section from Civil Service to Foreign Service. (Action: J/TIP, in coordination with DGHR)

The OIG team also counseled J/TIP managers on the need for an active, innovative plan to identify and recruit suitable Foreign Service officers that includes efforts to facilitate career enhancing onward assignments as part of that plan.

Strategic Planning

The senior coordinator for RMP coordinates and oversees J/TIP's foreign assistance budget process and annual strategic and performance planning functions. She liaises with other Department functional and regional bureaus (for example, the Office of the Director for U.S. Foreign Assistance and the Bureau of International Narcotics and Law Enforcement Affairs), and other foreign affairs agencies on budget related reporting (for example, the Operational Plan and Performance Plans reports) and other activities related to the federal budget process (for example, the Congressional Budget Justification and Office of Management and Budget justifications). The senior coordinator works with J/TIP's front office and other J/TIP sections to prepare the Bureau Strategic and Resource Plan and participates in office policy formulation. J/TIP currently is drafting an evaluation policy initiative in response to the Department's new policy and guidance.

Resource Management and Planning Team

In addition to strategic planning, the senior coordinator for RMP oversees a variety of functions, including administrative, grants management operations, and front office support. Currently a staff of nine (five Civil Service employees and four contractors) supports the coordinator for these functions.

Administrative Operations

From 2001 to 2007, J/TIP received executive office support from the Bureau of International Narcotics and Law Enforcement Affairs, Office of Resource Management (INL/RM). In 2006, J/TIP assumed some of these functions and added a grants officer and budget analyst to its staff. In 2007, J/TIP took over from INL/RM management of its diplomatic and consular programs operating funds, and performs the budget execution of INCLE funds allocated to J/TIP through INL/RM's management. INL/RM continues to provide some

administrative support, including INCLE funds control, oversight of general services operations, and information technology support. In FY 2010, J/TIP piloted with the Bureau of Human Resources, Office of Shared Services (HR/SS) for human resources support, transferring from INL/RM's contracted support with a Department human resources service provider. As part of the arrangement, J/TIP established a human resources specialist position to liaise with HR/SS.

Human Resources

A GS-12 human resources specialist provides support to J/TIP and liaises with HR/SS. She performs the full gamut of human resources functions except for position classification, employee actions, and initial orientation for newly hired employees, which HR/SS provides under a service agreement. J/TIP also consults with them if further clarification of policies in the Foreign Affairs Manual is required. J/TIP is satisfied with the support it receives from HR/SS. The human resources specialist performs other administrative duties and oversight in the section and serves as a de facto team leader for RMP. J/TIP plans to restructure this position and create a team leader position, similar to an administrative officer, which will reflect the structure of the other J/TIP sections. The OIG team agrees with this plan.

Training

J/TIP has no overall staff training plan. Staff complains that required training has been hard to schedule. The OIG team found staff training opportunities were not consistently applied throughout the office. Thus, some employees are encouraged to use training to enhance knowledge and skills required for their positions, while others are not, in part because of workload. A training plan for J/TIP is necessary to facilitate career development, training, and mobility for employees at all levels. J/TIP also does not comply with the Department's mandatory leadership and management training requirement. At the time of the inspection, eight of the office's GS-13, GS-14, and GS-15 employees had not attended required Foreign Service Institute leadership and management courses.

Recommendation 18: The Office to Combat and Monitor Trafficking in Persons should conduct a training needs assessment of its staff, develop a training plan, and implement it. (Action: J/TIP)

Recommendation 19: The Office to Combat and Monitor Trafficking in Persons should require overdue employees to attend the mandatory Foreign Service Institute leadership and management courses. (Action: J/TIP)

Performance management is discussed in the Management Controls section of the report.

Equal Employment Opportunity

Although J/TIP does not have a designated Equal Employment Opportunity counselor, the office uses Office of Civil Rights procedures for employees to identify and request a counselor, if needed. J/TIP reminds employees about the Department's Equal Employment Opportunity policies by periodically sending out reminders and other means, such as brown bag luncheons the human resources specialist organizes. J/TIP plans to add Department Equal

Employment Opportunity policies and guidance to its new orientation manual as a way to further inform employees. J/TIP staff generally gave the office consistently high marks for Equal Employment Opportunity awareness. The Office of Civil Rights confirmed that J/TIP did not have any Equal Employment Opportunity complaints filed over the last 5 years.

Grants Management

J/TIP currently oversees 168 grants in 68 countries and two special areas. Grants are funded from INCLE funds appropriated through INL/RM. A full-time grants officer hired in January 2011 and one contractor compose the management section. All program officers have received training for and been certified as grants officer representatives.

J/TIP has complied with Recommendation 5 of the 2006 inspection, which said that it “should establish and follow written procedures for maintaining grants files to include filing order, required documentation, such as financial and audit reports and six month and final evaluations, as well as monitoring reports, such as trip reports.” J/TIP has improved its files maintenance since the last inspection and written procedures for maintaining files have been issued. J/TIP centralized its hard-copy grants files in a single cabinet to the benefit of program officers, who no longer maintain working files. An examination of a sample of the hard-copy files show that they are well-organized and contain essential grant information, including agreements, trip reports, mandated programmatic and financial reports, and correspondence. Much of this information is increasingly collected electronically in the new State Assistance Management System (SAMS).

State Assistance Management System

In FY 2010, J/TIP was the first Department office to pilot SAMS for its grants with full deployment in FY 2011. Although SAMS has had a dramatic impact by making grants management more efficient, the system remains under development and reportedly is not user friendly. J/TIP’s experience with SAMS has been generally positive, but the system still lacks necessary capabilities. All SOI applications are now received through SAMS, and periodic performance reports from grantees are received into the system. Grantees submit quarterly financial reports through the payment management system; however, SAMS so far cannot easily incorporate correspondence, including emails between program officers, grantees, embassy officers and others into its electronic grants files. At present, these materials are held in the hard-copy files. J/TIP is working diligently with SAMS technical staff to make the system more comprehensive and effective as a monitoring and management tool.

Closeouts

The closeout procedure is the crucial final step in the grants life cycle and affects the Department’s financial management. After grants have ended, they must be closed out in a regular and timely fashion so that unused funds can be reobligated by the Department for other purposes or returned to the U.S. Treasury. Unliquidated funds risk waste, fraud, and abuse.

Grants Policy Directive 41 and the Code of Federal Regulations establish procedures for closeouts. Under the Directive, closeout of a grant should be completed within 30 days of receipt

of final financial, performance, and other reports from the grantee or 120 days after the end of the project period end date, unless waived by the grants officer. Chapter 22 Section 145.71 “Closeout Procedures” in the Code of Federal Regulations require that a grant recipient submit all financial, performance, and other reports required by the award contract within 90 days of the grant completion and that, unless waived by the grants officer, a recipient must liquidate all obligations under the award within 90 days of the funding period or the date of completion.

The OIG team found that a large number of grants have not been closed out in compliance with Grants Policy Directive 41 and the Code of Federal Regulations. J/TIP admitted that processing grants closeouts was not a high priority in the past and it did not have its own grants officer until early in 2011 to perform this process in a timely manner.

Since the end of FY 2011, J/TIP has given considerable emphasis to processing a substantial backlog of delinquent closeouts and recovering unliquidated obligations. The office recently hired a short-term contract employee to work exclusively on closeouts. As of the end of December 2011, 33 grants had been closed out while 70 remain open and overdue, deobligating \$211,834. Of this amount, \$135,550 was made available to J/TIP to reuse, but budget authority on \$76,283 had expired without benefit to the Department. At the time of the inspection, J/TIP had not completed entry of some of its old grants into SAMS but is making good progress; meanwhile, J/TIP continues to maintain hard-copy grants files.

Recommendation 20: The Office to Monitor and Combat Trafficking in Persons should eliminate the backlog of delinquent grants closeouts. (Action: J/TIP)

Recommendation 21: The Office to Monitor and Combat Trafficking in Persons should institute procedures to complete closeout of grants within 30 days of receipt of final financial, performance, and other reports from the recipient or 120 days after the end of the project period end date, unless waived by the grants officer, and in compliance with Code of Federal Regulations closeout procedures with regard to future grants closeouts. (Action: J/TIP)

Keeping Embassies Informed

J/TIP has worked to keep embassies better informed on grants since the 2006 inspection. Embassies participate in the grants award process at the SOI stage and later when full grants proposals are evaluated. J/TIP notifies embassies by cable after awarding grants. Since its staff is too small to make regular site visits to all grantees, the international programs unit depends on embassies to help it monitor grants performance. The OIG team learned of instances where vigilant embassy officers alerted J/TIP to potential grantee problems. Such timely notice allows J/TIP to make a site visit early enough to investigate and prepare a corrective action plan to save the grant. Not all interventions are successful. A \$575,000 grant was recently terminated in Haiti following a determination that the grantee failed to comply with the terms and conditions of the grant award.

Embassies do not now receive regular periodic grantee performance reports sent to J/TIP as a condition of the grant agreement. J/TIP explained that SAMS does not facilitate sharing such reports with embassies and J/TIP program officers have workload difficulties that prevent them from ensuring that embassies receive regular reports. J/TIP agrees that sharing reports on a

regular basis with embassies would be beneficial, strengthening embassies' abilities to spot possible problems and facilitate monitoring performance on the spot.

Recommendation 22: The Office to Monitor and Combat Trafficking in Persons should amend the language in the standard grant agreement to commit grantees to make their semiannual performance reports to the Office to Monitor and Combat Trafficking in Persons available simultaneously to the concerned embassy. (Action: J/TIP)

Space

J/TIP's office is located in a building about a 15-minute walk from the Harry S Truman building. Not being located in the main building contributes to a sense of isolation and separation among the staff. It also inhibits Truman building counterparts from attending J/TIP meetings, most of which take place in the J/TIP office. This situation affects J/TIP staff morale and has reinforced the perception in both J/TIP and the Department that J/TIP is not an integral part of the Department. J/TIP has pursued resolution of the space issue with the Under Secretary for Civilian Security, Democracy, and Human Rights, the Bureau of Administration, and INL/RM. Also affecting morale is the fact that working conditions are crowded with most offices having double and, in some cases, triple occupancy. Other staff members are located in small cubicles or are using desks in hallways. While not formalized, the current plan is for J/TIP, in the undefined future, to occupy space to be vacated by the Bureau of International Narcotics and Law Enforcement Affairs in its current location. That plan would not address the issue of integration of J/TIP into the Department.

Recommendation 23: The Bureau of Administration, in coordination with the Office to Monitor and Combat Trafficking in Persons, should conduct an office space utilization study and identify space in the Harry S Truman Building or adjacent annexes for relocation of the Office to Monitor and Combat Trafficking in Persons. (Action: A, in coordination with J/TIP)

Information Management

J/TIP receives information technology support from INL/RM and the Bureau of Information Resource Management; it does not have its own information technology applications. J/TIP is satisfied with the support it receives from INL/RM. Since INL/RM is located in the same building and on the same floor as J/TIP, requests for services are promptly resolved. INL/RM has made regular funds' transfers to provide information technology support to J/TIP. J/TIP finalized a memorandum of agreement with INL/RM during the inspection that documents INL/RM's services to J/TIP including information technology services and also defines reimbursement by J/TIP for services rendered.

Management Controls

The OIG team found no evidence that the Director of J/TIP has ever submitted a statement of assurance to the Secretary as required by 2 FAM 022.7. This requirement was apparently overlooked as J/TIP reported to the Under Secretary for Global Affairs in 2001 when the office was created. J/TIP received executive office support from INL/RM during the time when the Bureau of International Narcotics and Law Enforcement Affairs moved from the Office of the Under Secretary for Global Affairs to the Office of the Under Secretary for Political Affairs. The senior coordinator for RMP is J/TIP's designated management controls officer, but the designation is not specified in her position description. It is, however, noted in her performance appraisal in reference to office security and emergency response programs. While J/TIP appears to be cognizant of internal controls, the absence of a management controls program leaves the office vulnerable to fraud, waste, and mismanagement, especially with the significant staff turnover.

Recommendation 24: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Resource Management, should implement a management controls program for the office and provide an assurance statement addressed to the Secretary of State concerning the effectiveness of internal controls. (Action: J/TIP, in coordination with RM)

Informal Recommendation 3: The Office to Monitor and Combat Trafficking in Persons should include the management controls designation in the appropriate employee's position description and performance plan.

Performance Appraisals

A review of J/TIP's FY 2010 performance appraisals found that J/TIP had not prepared appraisals and mid-year reviews on several employees in the office despite reminders sent to supervisors. This supervisory failure does not comply with 3 Foreign Affairs Handbook-1 H-2823.1 performance appraisal requirements for Civil Service employees. Through the performance appraisal process, supervisors clarify employee work requirements, recognize performance, identify training needs, and grant awards. The annual evaluation process is also required to certify accurate position descriptions, provide the basis for granting within-grade step increases, and determine an employee's standing on retention registers in case of reductions in force. Department regulations require that the responsibility for preparing performance appraisals and mid-year reviews be specified in the supervisor's work requirements.

Recommendation 25: The Office to Monitor and Combat Trafficking should implement Department requirements for performance evaluations and mid-year performance reviews and implement a plan to hold accountable supervisors who fail to carry them out. (Action: J/TIP)

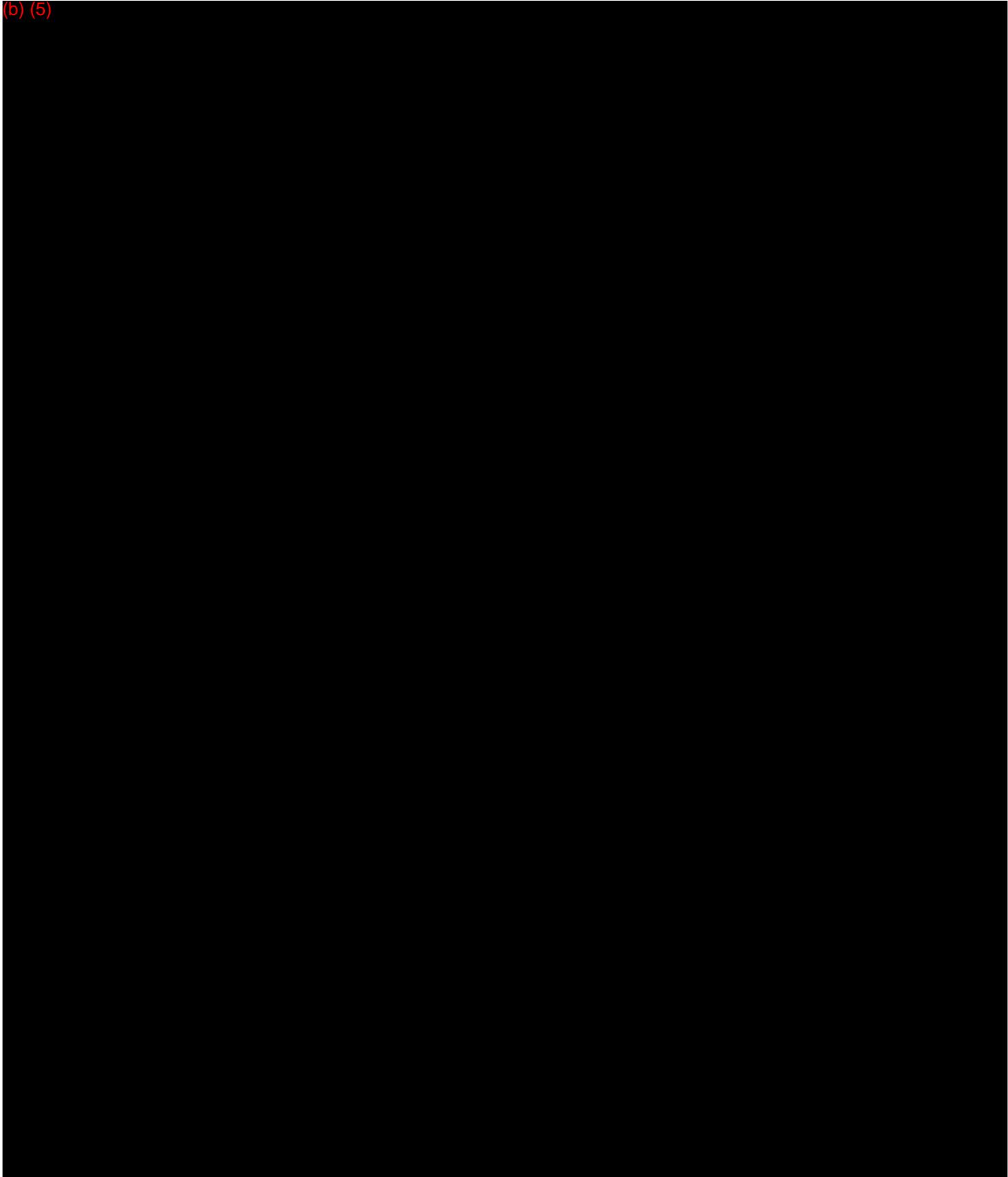
The OIG team's review of J/TIP performance appraisals also found that in at least one instance the wrong form was used. An employee with supervisory duties was rated on a form for a nonsupervisory employee.

Informal Recommendation 4: The Office to Monitor and Combat Trafficking in Persons should review all employee performance plans and assign the appropriate form based on employee classification.

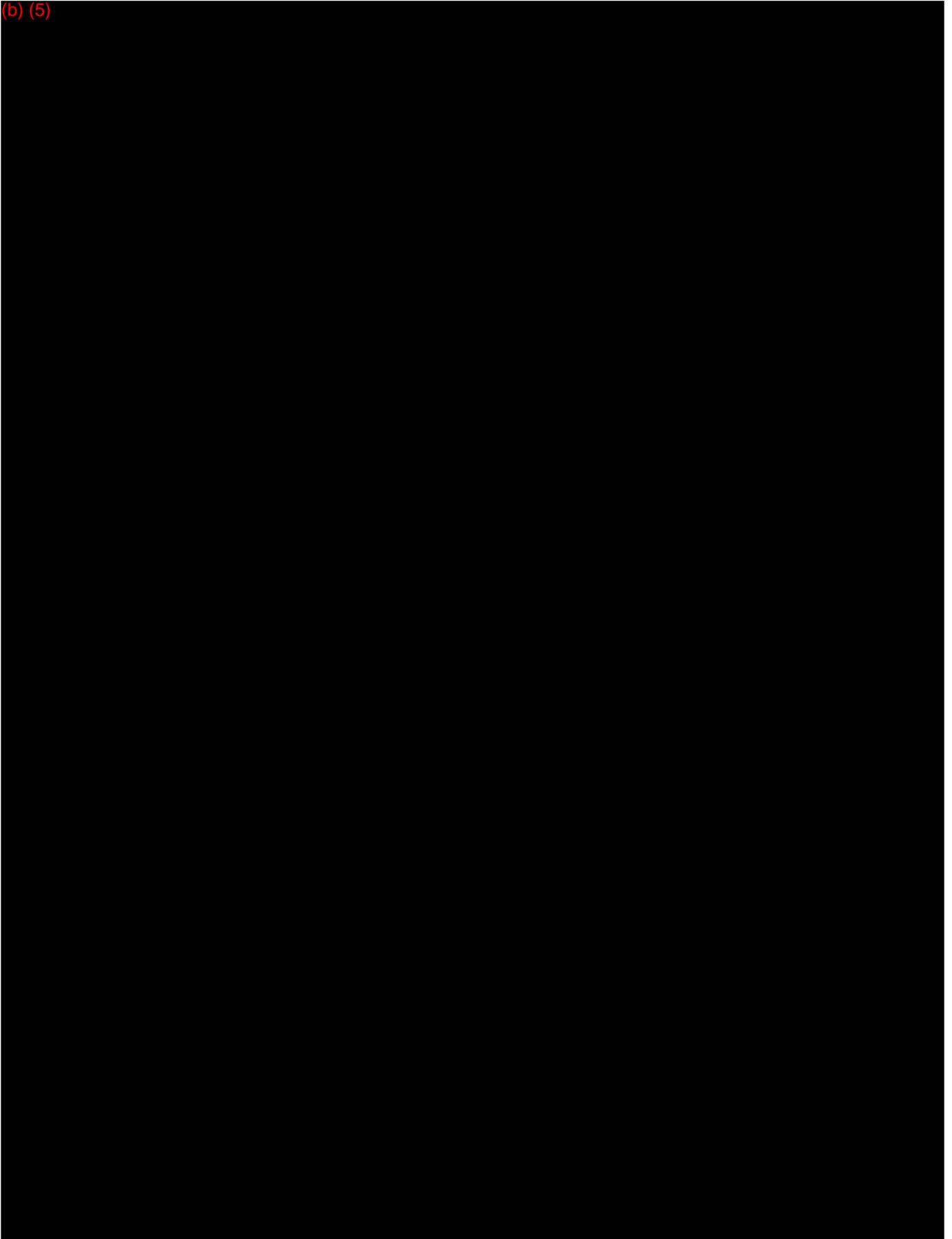
Purchase Cards

The budget analyst is the purchase card holder in J/TIP, and the senior coordinator for RMP is the approving officer. Having the budget analyst responsible for both ordering and payment is not a proper separation of duties as required by OMB Circular A-123 and 2 FAM 032. However, J/TIP's administrative staff is small and there are few direct-hire employees who can be assigned as cardholders. J/TIP has immediate plans to use the Ariba procurement program for the purchase card process, which will make it easier for another RMP staff member to perform the ordering. The program will also generate a buying log, which the section currently does not use but is recommended in the purchase card program manual. This action should remedy both shortcomings.

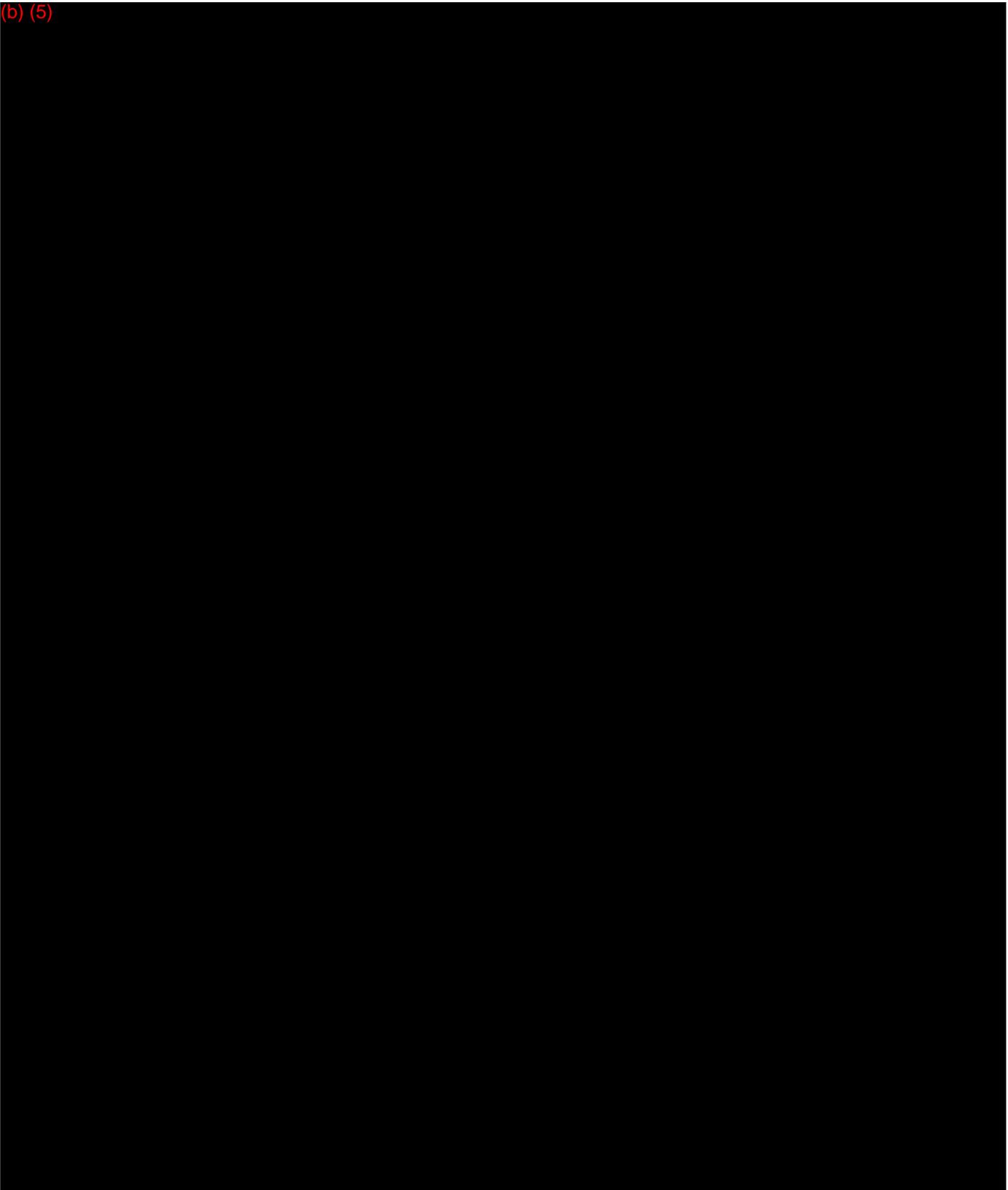
(b) (5)



(b) (5)



(b) (5)



List of Formal Recommendations

Recommendation 1: The Office to Monitor and Combat Trafficking in Persons should develop a staffing plan to reapportion individual reports and political affairs officer responsibilities among the personnel of the office in a manner to prevent individual officer burn out and to prevent untimely staff turnover in the reports and political affairs section. (Action: J/TIP)

Recommendation 2: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Foreign Service Institute, should create a distance learning course on trafficking-in-persons issues and the Department of State's obligations under the Trafficking Victims Protection Act, as amended, targeted for embassy reporting officers, regional bureaus' trafficking-in-persons coordinators, and their superiors. (Action: J/TIP, in coordination with FSI)

Recommendation 3: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of Human Resources, African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should include specific trafficking-in-persons briefings for all ambassadors and deputy chiefs of mission before they depart for their posts. (Action: J/TIP, in coordination with DGHR, AF, EUR, EAP, NEA,SCA, and WHA)

Recommendation 4: The Office to Monitor and Combat Trafficking in Persons should update the implementation guidelines for the minimum standards to reflect the latest language of the Trafficking Victims Protection Act and plan to reissue the updated guidelines annually. (Action: J/TIP)

Recommendation 5: The Office to Monitor and Combat Trafficking in Persons should implement a plan to gather non-U.S. Government trafficking-in-persons data on countries and share it with the appropriate U.S. embassy well before the due date of the embassy's submission of the Trafficking-In-Persons report data call. (Action: J/TIP)

Recommendation 6: The Office to Monitor and Combat Trafficking in Persons should revise current practices for drafting the Trafficking-In-Persons report in order to share a draft of the country narrative as early as practical with the concerned U.S. embassy and regional bureau. (Action: J/TIP)

Recommendation 7: The Office to Monitor and Combat Trafficking in Persons should cease publishing in hard copy the country narratives of the Trafficking-in-Persons report. (Action: J/TIP)

Recommendation 8: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should task U.S. embassies to develop action plans for their countries drawing from

Trafficking-in-Persons report narrative recommendations. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Recommendation 9: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should task U.S. embassies to draft the interim reports for the countries on the Tier 2 Watch List, subject to Office to Monitor and Combat Trafficking in Persons concurrence with the draft. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Recommendation 10: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Democracy, Human Rights, and Labor, should review and strengthen the current coordination mechanism to ensure that issues that intersect forced labor and human trafficking in the Department of State's annual reports are consistent. (Action: J/TIP, in coordination with DRL)

Recommendation 11: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should establish an annual award recognizing a Department employee for outstanding achievement in combating trafficking in persons. (Action: J/TIP, in coordination with DGHR)

Recommendation 12: The Office to Monitor and Combat Trafficking in Persons should explicitly limit the statements of interest received in response to the solicitation of grants proposals to those destined for priority countries identified in the annual Trafficking-in-Persons report. (Action: J/TIP)

Recommendation 13: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Resource Management, the Office of Global Partnership Initiatives, the Office of the Legal Adviser, and the Bureau of International Narcotics and Law Enforcement Affairs should implement a plan to partner with private sector potential donors or partners, consistent with existing Department authorities. (Action: J/TIP, in coordination with RM, S/GPI, L, and INL)

Recommendation 14: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureaus of African Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should develop additional performance metrics that capture the prevention or other related gains from various antitrafficking awareness activities and other related programs or legislation. (Action: J/TIP, in coordination with AF, EUR, EAP, NEA, SCA, and WHA)

Recommendation 15: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should request, and the Bureau of Human Resources should fill, the next two new full-time equivalent positions, if granted, with Foreign Service officers. (Action: J/TIP, in coordination with DGHR)

Recommendation 16: The Office to Monitor and Combat Trafficking in Persons should request reprogramming of the next vacant position in the reports and political affairs section and the next vacant position in the public engagement section from Civil Service to Foreign Service,

and the Bureau of Human Resources should approve the request. (Action: J/TIP, in coordination with DGHR)

Recommendation 17: The Office to Monitor and Combat Trafficking in Persons, in coordination with the Bureau of Human Resources, should request, and the Bureau of Human Resources should approve, reprogramming position S8403506 in the reports and political affairs section from Civil Service to Foreign Service. (Action: J/TIP, in coordination with DGHR)

Recommendation 18: The Office to Combat and Monitor Trafficking in Persons should conduct a training needs assessment of its staff, develop a training plan, and implement it. (Action: J/TIP)

Recommendation 19: The Office to Combat and Monitor Trafficking in Persons should require overdue employees to attend the mandatory Foreign Service Institute leadership and management courses. (Action: J/TIP)

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Recommendation 25: The Office to Monitor and Combat Trafficking should implement Department requirements for performance evaluations and mid-year performance reviews and implement a plan to hold accountable supervisors who fail to carry them out. (Action: J/TIP)

Recommendation 26: (b) (5)

[REDACTED]

Recommendation 27: (b) (5) [Redacted]

Recommendation 28: (b) (5) [Redacted]

Recommendation 29: (b) (5) [Redacted]

List of Informal Recommendations

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent regional bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess the mission's progress in implementing the informal recommendations.

Informal Recommendation 1: The Office to Monitor and Combat Trafficking in Persons should regularly invite senior Department staff officers to informal briefings and seminal meetings and periodically schedule these briefings and meetings in the Harry S Truman building.

Informal Recommendation 2: The Office to Monitor and Combat Trafficking in Persons should hold regular trafficking-in-persons reporting conferences, merging them with other more general reporting officer conferences in regional bureaus where the varied responsibilities of the reporting officers so dictate.

Informal Recommendation 3: The Office to Monitor and Combat Trafficking in Persons should include the management controls designation in the appropriate employee's position description and performance plan.

Informal Recommendation 4: The Office to Monitor and Combat Trafficking in Persons should review all employee performance plans and assign the appropriate form based on employee classification.

Informal Recommendation 5: (b) (5) [REDACTED]

Informal Recommendation 6: (b) (5) [REDACTED]

Informal Recommendation 7: (b) (5) [REDACTED]

Informal Recommendation 8: (b) (5) [REDACTED]

Principal Officials

	Name	Arrival Date
Director and Ambassador at Large	Luis E. CdeBaca	5/18/2009
Principal Deputy	Ann Terese Kennelly	9/14/2008
Deputy	Alison Friedman	9/15/2011
Senior Coordinators:		
Reports and Political Affairs	Mark Taylor	11/16/2003
International Programs	Marisa Ferri (Acting)	2/13/2012
Public Engagement	Laura Rundlet	12/5/2010
Resource Management and Planning	Paula Goode	5/29/2005

Acronyms

Department	Department of State
DS	Bureau of Diplomatic Security
FAM	Foreign Affairs Manual
HR/SS	Bureau of Human Resources, Office of Shared Services
INCLE	International Narcotics Control and Law Enforcement
INL/RM	Bureau of International Narcotics and Law Enforcement Affairs, Office of Resource Management
IVLP	International Visitor Leadership Program
J/TIP	Office to Monitor and Combat Trafficking in Persons
OIG	Office of Inspector General
PITF	President's Interagency Task Force
RMP	Resource Management and Planning
RPA	Reports and Political Affairs
SAMS	State Assistance Management System
SOI	Statement of Interest
SPOG	Senior Policy Operating Group
TIP	Trafficking in persons
TVPA	Trafficking Victims Protection Act

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OR MISMANAGEMENT**
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