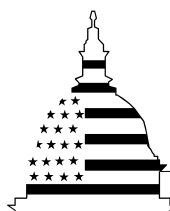


July 2007

HUMAN TRAFFICKING

Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements



G A O

Accountability ★ Integrity ★ Reliability



Highlights of [GAO-07-1034](#), a report to congressional requesters

Why GAO Did This Study

Human trafficking—a worldwide crime involving the exploitation of men, women, and children for others’ financial gain—is a violation of human rights. Victims are often lured or abducted and forced to work in involuntary servitude. Since 2001, the U.S. government has provided about \$447 million to combat global human trafficking. As GAO previously reported, estimates of the number of trafficking victims are questionable. In this report, GAO examines (1) collaboration among organizations involved in international antitrafficking efforts, (2) U.S. government monitoring of antitrafficking projects and difficulties in evaluating these projects, and (3) suggestions for strengthening monitoring and evaluation. GAO analyzed agency documents; convened an expert panel; interviewed officials; and conducted fieldwork in Indonesia, Thailand, and Mexico.

What GAO Recommends

GAO recommends that the Secretaries of State and Labor and the Administrator of USAID consider taking actions to (1) improve information about project impact on human trafficking and (2) address monitoring and evaluation in project design. In their comments, State agreed to implement the recommendations. While agreeing that monitoring and evaluation are important, Labor and USAID did not directly respond to GAO’s recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-07-1034.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Thomas Melito at (202) 512-9601 or melitot@gao.gov.

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What GAO Found

While governments, international organizations, and nongovernmental organizations have recognized the importance of collaborating and have established some coordination mechanisms and practices, they will need to overcome challenges that have impeded collaboration in the past for their efforts to be successful. In two of the three countries GAO visited, it found that host governments—which bear ultimate responsibility for combating trafficking within their borders—have passed national antitrafficking laws and enacted national action plans. However, organizations continue to face numerous challenges when collaborating to combat human trafficking, including varying levels of government commitment and capacity. For example, some governments treat foreign trafficking victims as illegal immigrants and deport rather than protect them. In addition, according to officials in two of the three countries GAO visited, the ministries responsible for coordinating antitrafficking efforts have limited authority and capacity.

U.S. government-funded antitrafficking projects often lack some important elements that allow projects to be monitored, and little is known about project impact due to difficulties in conducting evaluations. Project documents GAO reviewed generally include monitoring elements, such as an overarching goal and related activities, but often lack other monitoring elements, such as targets for measuring performance. To oversee projects, State officials supplement their efforts with assistance from U.S. embassy staff, but have not established written guidance for oversight. Officials said that they are working to improve performance measures and develop monitoring guidance. Conducting impact evaluations of antitrafficking projects is difficult due to several factors, including questionable project-level estimates of the number of trafficking victims. These estimates are needed for baselines by which to evaluate how effectively specific interventions are reducing trafficking. Elements in the design of certain projects, such as objectives that are too broad, further impede evaluation. Because of these difficulties, few impact evaluations have been completed, and little is known about the impact of antitrafficking interventions.

A GAO-convened panel of experts identified and discussed ways to address the factors that make it difficult to monitor and evaluate antitrafficking projects. Panelists’ suggested approaches included improving information on the nature and severity of trafficking and addressing monitoring and evaluation in project design. To improve information on trafficking, panelists suggested methods that have been used to sample other hard-to-reach populations, including domestic violence victims. One suggested method is sampling of “hot spots”—an intensive search for victims in areas known to have high concentrations of victims. To address weaknesses in project design that impede monitoring and evaluation, panelists suggested that officials design projects that clearly link activities to intended outcomes, identify measurable indicators, and establish procedures for setting and modifying targets.

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Abbreviations

ADB	Asian Development Bank
COMMIT	Coordinated Mekong Ministerial Initiative Against Trafficking
DHS	Department of Homeland Security
G/TIP	Department of State's Office to Monitor and Combat Trafficking in Persons
HHS	Department of Health and Human Services
IDB	Inter-American Development Bank
ILO	International Labor Organization
IOM	International Organization for Migration
NGO	nongovernmental organization
OAS	Organization of American States
OMB	Office of Management and Budget
OSCE	Organization for Security and Cooperation in Europe
PRM	Department of State's Bureau of Population, Refugees, and Migration
SPOG	Senior Policy Operating Group
TVPA	Trafficking Victims Protection Act
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development

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United States Government Accountability Office
Washington, D.C. 20548

July 26, 2007

The Honorable Ileana Ros-Lehtinen
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable F. James Sensenbrenner, Jr.
House of Representatives

Human trafficking—a worldwide crime involving the exploitation of men, women, and children for others’ financial gain—is a violation of fundamental human rights. Victims are often lured or abducted from their homes and subsequently forced, through various means, to work in prostitution, sweatshops, agricultural settings, or domestic service, among other types of servitude. In addition to inflicting grave personal damage upon its victims, trafficking undermines government authority, fuels organized criminal groups and gangs, and imposes social and public health costs. As we have previously reported, estimates of the number of trafficking victims are questionable due to data and methodological weaknesses.¹

To combat global human trafficking, the U.S. government directly implements projects overseas and contributes financial support to the United Nations (UN) and other international organizations. The U.S. government has strongly supported antitrafficking efforts and, since 2001, has provided approximately \$447 million in foreign assistance to nongovernmental organizations (NGO), international organizations, and foreign governments to combat and help eliminate human trafficking.² In addition, since the mid-1990s, the United States has played a leading role in putting human trafficking on the international community’s agenda. In 2000, Congress enacted the Trafficking Victims Protection Act³ (TVPA) to combat trafficking in persons; in 2003 and 2005, Congress reauthorized the

¹GAO, *Human Trafficking: Better Data, Strategy, and Reporting Needed to Enhance U.S. Antitrafficking Efforts Abroad*, [GAO-06-825](#) (Washington, D.C.: July 18, 2006).

²In 2003, the President announced the launch of a \$50 million initiative to support organizations active in combating trafficking and child sex tourism, and in rescuing women and children.

³Pub. L. No. 106-386.

act,⁴ which is due for reauthorization in 2007. In December 2005, the United States became a party to the United Nations' *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime*,⁵ which entered into force in 2003 and, as of July 2007, has 117 signatories and 113 party nations.

This review is part of a larger body of work that you requested on U.S. and international efforts to combat human trafficking in the United States and abroad.⁶ To review efforts to combat human trafficking, we examined (1) collaboration among organizations involved in international antitrafficking efforts, (2) U.S. government agencies' monitoring of antitrafficking projects and difficulties in evaluating these projects, and (3) suggestions for strengthening monitoring and evaluation.

To address these objectives, we reviewed relevant planning, funding, and project documents on human trafficking from the Departments of State, Justice, Labor, Homeland Security (DHS), and Health and Human Services (HHS) and the U.S. Agency for International Development (USAID). We also reviewed planning and project documents from relevant UN and other international agencies and offices, including the UN Office on Drugs and Crime (UNODC), International Labor Organization (ILO), International Organization for Migration (IOM), United Nations Children's Fund (UNICEF), and UN High Commissioner for Refugees (UNHCR). In addition, we discussed international antitrafficking efforts with officials from the above agencies and organizations, as well as foreign government officials and NGO representatives, in Washington, D.C., and during our fieldwork in Indonesia, Thailand, and Mexico. We selected these countries on the basis of the amount of U.S. funding provided for international

⁴Congress amended and reauthorized this act—the Trafficking Victims Protection Reauthorization Act of 2003 and the Trafficking Victims Protection Reauthorization Act of 2005. (Pub. L. Nos. 108-193 and 109-164.)

⁵This agreement, also known as the Palermo Protocol, seeks to prevent trafficking, protect victims, and promote antitrafficking cooperation among nations. The protocol supplements the U.N. Convention Against Transnational Organized Crime. It was opened for signature in Palermo, Italy, in December 2000.

⁶We issued our first report, [GAO-06-825](#), in July 2006. See also *Human Trafficking: A Strategic Framework Could Help Enhance the Interagency Collaboration Needed to Effectively Combat Trafficking Crimes*, [GAO-07-915](#) (Washington, D.C.: July 26, 2007), which addresses U.S. federal law enforcement agencies' efforts to investigate and prosecute human trafficking crimes in the United States.

antitrafficking projects and the number of U.S. government agencies and international organizations working in each country. In April 2007, we worked with the National Academy of Sciences to organize a 2-day expert panel on challenges and alternative strategies for monitoring and evaluating international antitrafficking projects. We conducted our review from August 2006 to June 2007 in accordance with generally accepted government auditing standards. Appendix I provides a detailed description of our objectives, scope, and methodology.

Results in Brief

While governments, international organizations, and NGOs have recognized the importance of collaborating and have established some coordination mechanisms and practices, they will need to overcome challenges that have impeded collaboration in the past for their efforts to be successful. The UN General Assembly passed a resolution in December 2006 recognizing that broad international cooperation is essential for combating trafficking, and UNODC launched the Global Initiative to Fight Human Trafficking in March 2007. In two of the three countries we visited, we found that host governments—which bear ultimate responsibility for combating trafficking within their borders—have passed national antitrafficking laws and enacted national action plans. However, organizations continue to face numerous challenges when collaborating to combat human trafficking, including varying levels of government commitment and capacity. For example, some governments treat foreign trafficking victims as illegal immigrants and deport rather than protect them. In addition, according to officials in two of the three countries we visited, the ministries responsible for coordinating antitrafficking efforts have limited authority and operational capacity.

U.S. government-funded antitrafficking projects often lack some important elements that allow projects to be monitored, and little is known about project impact due to difficulties in conducting evaluations. Project documents we reviewed generally include monitoring elements, such as an overarching goal and related activities, but they often lack other monitoring elements such as targets for measuring performance. To oversee antitrafficking projects, State officials told us they need to supplement their efforts with assistance from U.S. embassy staff, but they have not established written guidance for oversight. Officials said that they are working to improve performance measures and develop monitoring guidance. Conducting impact evaluations of antitrafficking projects is difficult due to several factors, including questionable project level estimates of the number of trafficking victims. These estimates are needed

for baselines by which to evaluate how effectively specific interventions are reducing trafficking. In addition, elements in the design of certain antitrafficking projects, such as short time frames and objectives that are too broad, further impede evaluation. Because of these difficulties, few evaluations that determine impact have been completed. As a result, little is known about the impact of antitrafficking interventions.

A GAO-convened panel of experts identified and discussed ways to address the factors that make it difficult to monitor and evaluate antitrafficking projects. Panelists' suggested approaches included improving information on the nature and severity of human trafficking and addressing monitoring and evaluation weaknesses in the design of antitrafficking projects. To improve information on the nature and severity of human trafficking, panelists suggested several sampling methods that have been used to sample other hard-to-reach populations, including the homeless, hidden migrants, missing and exploited children, and domestic violence victims. One suggested method is sampling of "hot spots"—an intensive search for victims in areas known to have high concentrations of victims or in areas to which many victims return. To address weaknesses in project design that impede monitoring and evaluation, panelists suggested that officials design projects that clearly link activities to intended outcomes, identify measurable indicators, and establish procedures for setting and modifying targets. Panelists further advised officials to determine which projects are ready to be evaluated before conducting an evaluation.

To improve the monitoring and evaluation of antitrafficking projects, we are making two recommendations to the Secretaries of State and Labor and the Administrator of USAID because they provided the most U.S. funding for projects to combat global human trafficking. First, to improve information about project impact on the nature and severity of human trafficking, we are recommending that these three officials consider several actions, where appropriate, such as developing better data about the incidence of trafficking at the project level and applying rigorous evaluation methodologies. Second, to address monitoring and evaluation weaknesses in the design of antitrafficking projects, we are recommending that these three officials consider other actions, such as developing frameworks that clearly link activities with project-level goals, indicators, and targets; conducting "evaluability assessments" to determine whether a project is ready to be evaluated; and building evaluation into project design before the project is implemented.

We received written comments on a draft of this report from State, Labor, USAID, and HHS, which are reprinted in appendixes IV, V, VI, and VII, along with our responses to specific points. State said that the report confirms several challenges inherent in foreign assistance efforts, including antihuman trafficking programs. However, State disagreed with our finding that monitoring is limited, stating that monitoring is in place at the department and improving. While we recognize that State and other U.S. agencies have certain elements of monitoring in place, we report that most projects lack other important elements, including a logic model that clearly explains how activities are linked to project goals and targets that will establish benchmarks for measuring performance. Labor said the report provides a good overall assessment of international cooperation regarding antitrafficking efforts and the need to enhance collaboration, and highlights important areas for improving monitoring and evaluation. However, Labor stated that the report does not fully reflect several mechanisms it uses, including audits and process evaluations, to monitor and oversee antitrafficking projects. In response, we revised the text to further clarify Labor's monitoring and evaluation efforts. USAID commented that it is concerned with the challenges of coordination, monitoring, and evaluation, and agreed to continue working to make improvements in these areas. State agreed to implement our recommendations, while Labor and USAID did not directly respond to our recommendations. HHS said that the report substantively covers the range of programs and services available to combat human trafficking.

Background

Human trafficking generally involves the use of force, fraud, or coercion to enslave individuals in situations that are exploitative and often illegal and dangerous. Since 2001, the U.S. government has contributed approximately \$447 million worldwide to foreign governments, NGOs, and international organizations—such as UNODC, ILO, and IOM—to combat human trafficking. U.S. agency and international organization projects generally aim to prevent trafficking, protect victims, and prosecute traffickers. Organizations have different requirements for monitoring and evaluating their antitrafficking projects.

Human Trafficking Cases Often Follow a Similar Pattern

Although the crime of human trafficking can take different forms in different regions and countries around the world, most human trafficking cases follow a similar pattern—that is, traffickers use acquaintances or false advertisements to recruit men, women, and children in or near their

homes, and then transfer them to and exploit them in another city, region, or country.⁷ According to the TVPA, victims of severe forms of trafficking include those who are recruited or transported for labor through the use of force, fraud, or coercion and for the purpose of subjecting them to involuntary servitude.⁸ The use of fraud, force, or coercion typically distinguishes human trafficking victims from individuals who are smuggled. In some cases, individuals may enter freely into agreement with and pay smugglers to help them cross international borders. After arriving at their destination, however, individuals who do not understand the destination country's language or culture may be exploited by individuals who take advantage of their vulnerability.

Traffickers control their victims' living and working conditions by physically confining them, taking away their identity documents, and threatening their families. Traffickers also exploit victims' fears that authorities will prosecute or deport them if they seek help. Victims may be forced to work in legal or illegal and often dangerous areas, including brothels, sweatshops, agricultural businesses, and people's homes. Documented human trafficking cases have involved victims such as children forced to beg for money in cities, work in carpet shops, and participate in pornography and sex acts with adults; women held in slavery-like conditions as domestic servants, strip club dancers, and prostitutes; and men forced to perform work in the agricultural sector and on fishing vessels.

⁷The Palermo Protocol defines trafficking in persons as the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude, or the removal of organs.

⁸Under the TVPA, victims of severe forms of trafficking are defined as those persons subject to (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such acts is under age 18 or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. The TVPA does not specify movement across international boundaries as a condition of trafficking; it does not require the transportation of victims from one locale to another. (Pub. L. No. 106-386.)

U.S. Government and Multilateral Organizations' Projects Focus on Three Areas

To combat the diverse forms of global human trafficking, 5 U.S. departments, USAID, and at least 15 international organizations have provided assistance to governments and civil society organizations in more than 100 countries. Assistance generally aimed to enhance efforts to

1. *prevent* human trafficking through public awareness, outreach, education, and advocacy campaigns;
2. *protect and assist* victims by providing shelters as well as health, psychological, legal, and vocational services; and
3. *investigate and prosecute* human trafficking crimes by providing training and technical assistance for law enforcement officials, such as police, prosecutors, and judges.

These categories of interrelated victim-centered assistance activities—prevention, protection, and prosecution—are commonly referred to as “the three p’s.” Each type of assistance is viewed as critical for reducing the incidence of human trafficking.

Since 2001, U.S. government agencies have provided approximately \$447 million in foreign assistance to international organizations, NGOs, and foreign governments to combat human trafficking (see table 1). Of the U.S. agencies, State, Labor, and USAID have provided the most funding to combat global human trafficking.

Table 1: U.S. Funding Obligated for Activities to Combat Global Human Trafficking, Fiscal Years 2001-2006

Dollars in millions							
	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	Total
State	\$11.47	\$23.01	\$28.13	\$33.36	\$34.41	\$18.36	\$148.74
USAID	6.74	10.72	15.42	27.59	21.34	27.31	109.12
Labor ^a	22.26	32.93	48.31	18.65	35.90	28.05	186.10
Justice ^b	0	0	0	0.20	0	0	0.20
HHS	0	0	0	0	2.20	0	2.20
DHS ^c	n/a	0	0	0.20	0	0	0.20
Total	\$40.47	\$66.66	\$91.86	\$80.00	\$93.85	\$73.72	\$446.56

Source: GAO analysis of data provided by the Department of State's Office to Combat and Monitor Trafficking in Persons and the Department of Labor.

Note: Funding is reported upon obligation by agencies in the year in which it is obligated.

^aIn response to inquiries from GAO, Labor reclassified projects funded in 2001 and 2005 and subsequently revised figures for these years. In addition to the \$28,048,000 allocated for projects to combat trafficking in 2006, Labor provided \$300,000 for a trafficking research project.

^bIn addition to the \$200,000 in Justice funding, State provided additional funding to the department's Office of Overseas Prosecutorial Development, Assistance and Training and International Criminal Investigative Training Assistance Program to conduct training overseas. In fiscal year 2004, State provided a total of \$6.50 million to the two Justice programs; in fiscal year 2005, it provided \$2.08 million. In fiscal year 2006, State and USAID provided \$1.90 million. These amounts are reflected in the State total in this table.

^cDHS officials stated that additional funds used to carry out antitrafficking activities, including law enforcement activities, come from its regular budget and cannot be broken out.

As we have previously mentioned, U.S. agencies support antitrafficking projects implemented worldwide by various international organizations, which also receive funding from other donor governments and organizations. As shown in table 2, for UNODC, ILO, and IOM, total resources allocated to combating trafficking since 2000 totaled about \$255 million. The U.S. government provided about \$122 million to UNODC, ILO, and IOM to combat human trafficking, according to data provided by these organizations and State's Office to Combat and Monitor Trafficking and Persons (G/TIP). In addition, according to UNICEF's annual reports, between 2003 and 2005, UNICEF allocated more than \$453 million to its worldwide child protection program, which includes projects to combat trafficking and the sexual exploitation of children.⁹

Table 2: Selected International Organizations' Funding for Antitrafficking Projects		
Dollars in millions		
	U.S. government funding for antitrafficking projects ^a	Total funding for antitrafficking projects from the United States and other donors
Worldwide organizations		
UNODC ^b	\$5.28 (2002-06)	\$18.16 (2002 to present)
ILO ^c	46.35 (2000 to present)	84.47 (2000 to present)
IOM ^d	70.10 (2000 to present)	152.18 (2000 to present)
Total	\$121.73	\$254.81

⁹UNICEF was not able to break out budget data for trafficking-specific projects or activities. According to State G/TIP data, U.S. government support to UNICEF for antitrafficking projects from fiscal years 2002 to 2006 totaled \$7.14 million.

(Continued From Previous Page)

Dollars in millions

	U.S. government funding for antitrafficking projects ^a	Total funding for antitrafficking projects from the United States and other donors
Regional organizations		
Organization for Security and Cooperation in Europe (OSCE) ^e	\$0.69 (2004-2006)	\$5.50 (2004-2006)
Organization of American States (OAS) ^f	1.21 (2000 to present)	1.40 (2000 to present)
Multilateral development banks		
Inter-American Development Bank (IDB) ^g		\$1.43
Asian Development Bank (ADB) ^h		1.69

Source: GAO analysis of data provided by State, UN agencies, multilateral development banks, and regional organizations.

Note: Organizations included in this table were able to separate funding amounts for trafficking-specific projects. Information on other international organizations involved in combating human trafficking—but for which funding information for trafficking-specific projects was not available—is included in appendix II.

^aAmounts reflect U.S. government extrabudgetary support specifically for antitrafficking projects. Amounts do not reflect the U.S. government's regular contributions to these organizations.

^bAmount of U.S. government funding to UNODC was based on GAO analysis of data provided by State G/TIP. Amount of total UNODC funding for antitrafficking projects was based on GAO analysis of data provided by State and UNODC.

^cAmounts of U.S. government funding and total ILO funding were provided by ILO.

^dAmounts of U.S. government funding and total IOM funding were provided by IOM. Totals were calculated, in part, on the basis of U.S. dollar amounts converted from other currencies using exchange rates as of May 2007.

^eAmounts reflect donor pledge amounts provided by OSCE for a 2-year period (2004-2006), as of May 2007. Funding amounts in Euros—552,617 and 4,387,454—were converted to U.S. dollars using a weighted average annual exchange rate for the period beginning 2004 and ending March 2007. According to GAO analysis of State G/TIP data, total U.S. funding for OSCE antitrafficking projects for the 4-year period from 2002 to 2006 was approximately \$1.5 million.

^fAmounts reflect funding data provided by OAS's Department of Public Security for its antitrafficking projects. In addition, according to State G/TIP data, USAID provided \$367,150 to the OAS Inter-American Commission on Women for antitrafficking projects in fiscal year 2003, and G/TIP provided \$405,548 to implement an OAS coordinator's antitrafficking activities in fiscal year 2004.

^gIDB also funded two countries' security programs, one capacity-building project and one gender mainstreaming project, that each included antitrafficking components.

^hAccording to ADB, this amount was allocated to trafficking-specific activities included in five technical assistance projects. In addition, ADB included human trafficking prevention components in 16 transport projects totaling \$2.3 billion. The amount of trafficking-specific components in these projects was not available.

Some U.S. agencies and international organizations have provided assistance that, although not specifically related to human trafficking, may help to combat trafficking by reducing individuals' vulnerability to becoming victims and by strengthening countries' judicial systems. For example, USAID, the World Bank, the Asian Development Bank, and the Inter-American Development Bank have implemented projects to root out corruption, build host governments' legal systems, and improve the economic conditions of vulnerable populations in developing countries. See appendix II for additional information on international organizations' missions and antitrafficking activities.

U.S. Agency and International Organizations' Monitoring and Evaluation Requirements Vary

Monitoring and evaluation are important tools for managing projects and should be considered when designing projects. Performance measurement involves developing a logic framework to explain how an intervention is to achieve its intended outcomes. Monitoring helps agencies determine whether the project is meeting its goals, update and adjust interventions and activities as needed, and ensure that funds are used responsibly. Monitoring includes, among other things, the development of indicators that are linked as closely as possible to the variables identified in the logic framework. These indicators are to be used throughout implementation to assess whether the project is likely to achieve the desired results. Monitoring also involves the choice of baseline and target values for each indicator and includes plans for periodic performance reports and data quality reviews. Evaluation is needed to assess a project's impact or effectiveness. Project evaluation involves the development of a methodology that will be used to assess the project's impact and describes plans for collecting baseline, interim, and final data on project results.

The TVPA requires the President's Interagency Task Force to Monitor and Combat Trafficking in Persons to measure and evaluate the progress of the U.S. government's efforts to combat trafficking. The Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA 2003) includes a congressional finding that additional research is needed to fully understand the phenomenon of trafficking in persons and to determine the most effective strategies for combating trafficking. The TVPRA 2003 also requires an annual report from the U.S. Attorney General to Congress to provide information on U.S. government activities to combat trafficking in persons. In addition to these reports, Justice began preparing annual assessments of U.S. government activities to combat trafficking in persons in 2003. All six U.S. organizations' guidelines also require implementers to monitor and report on project performance. In addition, Labor also

requires independent midterm and final evaluations for all international antitrafficking projects.

Organizations Have Taken Steps to Collaborate, but Continue to Face Challenges

Global, regional, and country-level organizations recognize the importance of collaborating to effectively combat human trafficking. Although organizations involved in combating trafficking—governments, multilateral organizations, and donors—have implemented some practices to strengthen collaboration, to succeed they will need to overcome challenges that can impede collaboration, including varying levels of government commitment and capacity.

Global, Regional, and Country-Level Organizations Recognize the Importance of Collaborating to Effectively Combat Human Trafficking

At the global level, several UN organizations have acknowledged the importance of collaborating to effectively combat human trafficking. The UN Chief Executives Board¹⁰ recognized the challenges in countering human trafficking and proposed establishing an interagency mechanism to strengthen coordination in 2005. In July 2006, a UN Economic and Social Committee resolution requested that UNODC organize a meeting to coordinate the technical assistance that UN and other intergovernmental organizations provide. In December 2006, the UN General Assembly adopted a resolution recognizing that broad international cooperation between member states and intergovernmental and nongovernmental organizations is essential for effectively countering the threat of human trafficking, and underlined the importance of bilateral, subregional, and regional partnerships, initiatives, and actions. This resolution further encouraged member states to initiate and develop working-level contacts among countries of origin, transit, and destination, especially among police, prosecutors, and social authorities.

Organizations at the regional level have also recognized the importance of collaboration. For example, in a September 2006 report, the Organization for Security and Cooperation in Europe's (OSCE) antitrafficking unit noted that, since trafficking is a transnational crime, collaboration is crucial to enable transnational mechanisms of communication and cooperation among governments, law enforcement, judiciary, and NGOs. In addition, six

¹⁰The Chief Executives Board furthers coordination and cooperation on substantive and management issues facing UN system organizations. The board brings together on a regular basis the executive heads of the organizations of the UN system, under the chairmanship of the UN Secretary General.

countries in the Mekong subregion of Southeast Asia have called for strengthened cooperation to combat human trafficking under a process called the Coordinated Mekong Ministerial Initiative Against Trafficking (COMMIT).

At the country level, donor governments and UN organizations have also recognized the need to establish coordination mechanisms to, among other things, share information and leverage the comparative advantages of each organization. The Paris Declaration of Aid Effectiveness¹¹ establishes the importance of donor coordination, stating that excessive fragmentation of aid at the global, country, or sector level impairs its effectiveness. It further states that a pragmatic approach to the division of labor and burden sharing increases complementarity and can reduce costs. Through the declaration, donors committed to make use of their respective comparative advantage at a sector or country level by delegating authority to lead donors for the execution of projects, activities, and tasks. To draw on the collective strengths of the UN agencies and programs operating in a country, UN country teams and the host government develop a national analysis, called a common country assessment. They subsequently produce a national development assistance framework, which describes the collective UN response and the expected results to achieve national priorities.

For U.S. government agencies, a 2002 presidential directive stated that strong coordination among agencies working on domestic and foreign policy is crucial.¹² The directive called for departments and agencies to coordinate U.S. foreign assistance programs, including those that provide funding to governmental or nongovernmental organizations to combat trafficking in persons. State officials told us that this is done through the Senior Policy Operating Group (SPOG), which, among other activities, facilitates a review by SPOG programming agencies of each other's grant proposals for antitrafficking projects.

¹¹The Paris Declaration, endorsed on March 2, 2005, is an international agreement under the Organization for Economic Cooperation and Development that aims to provide a practical, action-oriented road map to improve the quality of aid and its impact on development. The 56 partnership commitments are organized around 5 key principles: ownership, alignment, harmonization, managing for results, and mutual accountability. The United States is one of the participating countries.

¹²National Security Presidential Directive 22 (signed on Dec. 16, 2002).

Organizations Face Challenges in Collaborating to Combat Trafficking

Some Practices Can Help Enhance and Sustain Collaboration

Given the large number of organizations involved, collaboration is crucial to combating human trafficking. As we have previously reported, organizations can enhance and sustain their collaborative efforts by engaging in the following practices:

- Define and articulate common outcomes.
- Establish mutually reinforcing or joint strategies.
- Identify and address needs by leveraging resources.
- Agree on roles and responsibilities.
- Establish compatible policies and procedures and other means to operate across agency boundaries.
- Develop mechanisms to monitor, evaluate, and report on the results of the collaborative effort.
- Reinforce agency accountability for collaborative efforts through agency plans and reports.
- Reinforce individual accountability for collaborative efforts through performance management systems.

All of these practices may not necessarily apply to all levels of collaboration; individual circumstances should determine which practices and what level of detail are needed. Factors such as leadership and trust are also necessary conditions for establishing, sustaining, and reinforcing a collaborative culture.

Source: GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, GAO-06-15 (Washington, D.C.: Oct. 21, 2005).

Organizations—governments, multilateral organizations, and NGOs—face several challenges in collaborating to combat human trafficking, including the following:

- *Government commitment varies.* State's annual *Trafficking in Persons Report*, which analyzes and ranks foreign governments' compliance with minimum standards to combat trafficking, as outlined in the TVPA, illustrates governments' varied efforts to address the issue. For example, governments might not recognize trafficking as a problem. They may treat foreign trafficking victims as illegal immigrants and deport them back to their home countries, rather than protect them. They also may not recognize trafficking within their own borders as a problem. Moreover, some government officials are themselves involved in human trafficking.
- *Government capacity varies.* Governments with greater resources and more established institutions have a greater capacity to address trafficking than countries that are poorer or less stable. In addition, changes in government leadership and personnel, due to elections, coups, assassinations, or other events, may result in the loss of expertise in combating human trafficking. Furthermore, governments may put trafficking under the purview of ministries with limited authority, such as women's ministries.
- *Organizations that combat trafficking vary in perspective and may be in competition for limited funds.* Combating trafficking involves organizations—at the international and country levels—with expertise in raising awareness, assisting child and adult victims, and investigating trafficking cases, among other areas. Organizations may view trafficking through their own mandates or viewpoints and may perceive each other not only as collaborators but also as competitors for scarce resources. As such, they may not share information, which could lead to duplication and waste of funds.¹³
- *Understanding of trafficking varies across languages and cultures.* Countries approach trafficking in different ways. For example, some countries' national antitrafficking strategies do not include men as

¹³UN Chief Executives Board High Level Committee on Programs, *Follow-up to CEB/HLCP decisions: Curbing Transnational Crime*, CEB/2004/HLCP/VIII/CRP (Sept. 9, 2004).

potential trafficking victims; also, in some countries, parents in villages often sell their children to work as domestic servants in large cities. Furthermore, translation issues can complicate establishing a common understanding of what constitutes trafficking. For example, although the legal term in Spanish for human trafficking is “trata de personas,” English speakers have translated human trafficking into Spanish as “tráfico de personas,” which in fact means human smuggling.

Organizations Have Taken Steps to Strengthen Collaboration, but Challenges Remain at the Global, Regional, and Country Levels

Global and Regional Collaboration Efforts Have Recently Been Initiated

Organizations at the global level have defined a common outcome—to end human trafficking and slavery—and have recently initiated various efforts to strengthen collaboration. In March 2007, UNODC launched the Global Initiative to Fight Human Trafficking to generate political will, an action plan, and financial resources to combat trafficking worldwide. The steering committee of the initiative includes the six leading international organizations involved in combating trafficking in persons: UNODC, ILO, IOM, UNICEF, OSCE, and the Office of the United Nations High Commissioner for Human Rights. UNODC also created the Interagency Cooperation Group Against Trafficking in Persons in September 2006 with the intended outcome of improving coordination between UN agencies and other international organizations, and to facilitate a holistic approach to preventing and combating human trafficking. The group’s functions include exchanging information and promoting the effective and efficient use of resources.

Most existing regional coordination efforts that we reviewed have defined a common outcome and established action plans for carrying out antitrafficking activities. These efforts vary regarding whether they are specifically directed against trafficking or are included in discussions on migration or smuggling. In addition, they vary in number of participating members from as few as 6 countries in the Mekong subregion to as many as

56 countries in Europe, Asia, and North America. For example, the governments involved in a UN project that specifically focused on strengthening cooperation to combat trafficking in the Mekong subregion have agreed to undertake 18 actions to combat human trafficking, as part of an effort called the COMMIT process. Officials stated that this agreement strengthens these countries' incentives to undertake the actions through mutual accountability. In addition, COMMIT developed an action plan that groups existing activities into a single framework delineating roles and responsibilities of UN organizations, implementing partners, and governments in the six Mekong countries. Officials contrasted the COMMIT process, which includes a small group of countries in one region with interconnected trafficking problems, to larger organizations such as the Bali Process, which approaches trafficking issues in conjunction with issues related to smuggling in the Asia-Pacific region and has a larger geographic scope, consisting of 38 governments across several regions. These officials stated that having a larger geographic scope makes it more difficult for the governments of these countries to hold each other accountable for implementing the regional action plan. In addition to these examples, OSCE initiated the Alliance against Trafficking in Persons, which established a partnership with major actors working to combat human trafficking to, among other things, develop joint strategies and provide OSCE participating states and others with harmonized decision-making aids. In Southeastern Europe, the International Center for Migration Policy Development has begun a project to facilitate the creation of a transnational referral mechanism by 10 governments in the region and national NGOs to improve transnational case management and victim protection. Furthermore, in the western hemisphere, the Organization of American States (OAS) held a conference in 2006 that resulted in guidelines for the 34 member states and OAS to combat human trafficking.

Organizations continue to face obstacles as they work on global and regional initiatives to collaborate to combat trafficking. For example, governments disagree on whether there is a difference between "forced" and "voluntary" prostitution. Such disagreements can hinder collaborative efforts in combating sex trafficking. These global and regional initiatives may eventually implement additional practices to enhance collaboration, but it is too early to determine the success of the current initiatives.

Country-Level Organizations
Have Taken Some Steps to
Strengthen Collaboration, but
Continue to Face Difficult
Challenges

Although organizations—including host governments, UN organizations, U.S. government agencies, and other donor governments—in the three countries we visited have implemented practices to strengthen collaboration in combating trafficking, they continue to face challenges. None of the three countries has mechanisms to coordinate the efforts of all organizations involved in combating trafficking. Host governments bear ultimate responsibility for combating trafficking within their borders, and governments of the countries we visited have taken some steps to collaborate. For example, the Indonesian and Thai governments have passed national antitrafficking laws and enacted national action plans that define common outcomes, outline strategies, and assign roles and responsibilities. However, neither government's action plan includes trafficking of men in its definition of human trafficking. Officials in Indonesia stated that they expect to revise the plan to include the trafficking of men, as well as women and children, based on legislation passed in 2007. Although both the Indonesian and Thai governments hold interagency meetings, the ministries responsible for coordinating antitrafficking efforts have limited authority and operational capacity, according to officials we interviewed. Unlike Indonesia and Thailand, Mexico has neither a national antitrafficking law nor an action plan. Mexican officials stated that they convened one interagency meeting on human trafficking and plan to institute additional coordination mechanisms after the government passes a national antitrafficking law.

In Indonesia and Thailand, UN organizations, in conjunction with host governments, have developed country assessments and assistance frameworks to articulate overall development goals—including combating trafficking—joint strategies, and roles and responsibilities. UN organizations working on trafficking in Thailand also meet as part of the Mekong regional project that we previously discussed; although, according to one donor government official, attendance among UN organizations is sporadic. UN officials in Indonesia told us that they share information informally, but do not meet on a regular basis to discuss trafficking.

According to U.S. government officials in Indonesia and Thailand, donor governments have made sporadic and informal efforts to leverage resources and avoid duplication of effort.¹⁴ For example, as a result of informal coordination, Justice and French government officials worked

¹⁴The United States is the only government donor that implements antitrafficking projects in Mexico.

together on a criminal justice training project in Indonesia. In Thailand, according to a U.S. official, although most of the major donors attend the Mekong regional project's meetings, these meetings are generally focused on UN activities, with little opportunity for donors to coordinate. Officials in Indonesia and Thailand acknowledged the need to establish regular bilateral donor coordination efforts on trafficking issues and, at the time of our fieldwork, had begun discussing the establishment of regular coordination meetings.

While U.S. government agencies overseas have developed some collaboration mechanisms to combat trafficking, they continue to face challenges in coordinating their efforts. The U.S. embassies in the three countries we visited, Indonesia, Thailand, and Mexico, include trafficking in persons in their mission performance plans, which establish combating trafficking as a component of the U.S. government's overall strategy in each country. U.S. officials in these countries told us they organize trafficking-specific meetings that include U.S. government agencies and their implementing partners, primarily to share information. The U.S. government officials who were involved in antitrafficking issues were responsible for other issues as well. In Indonesia, for example, the primary U.S. embassy contact for trafficking was also temporarily assigned deputy chief of mission in East Timor. In Mexico, one agency official, whose responsibilities consisted solely of human trafficking issues, had been named to also serve as coordinator and primary contact for all U.S. antitrafficking efforts. After this official's departure in December 2006, her portfolio was added to the existing portfolio of another official from the same U.S. agency. At the time of our visit in February 2007, State, USAID, and DHS officials, who also covered other issues, were holding meetings to coordinate their antitrafficking efforts internally. However, a new U.S. antitrafficking coordinator for Mexico had not been designated. Consequently, some Mexican government officials expressed uncertainty about which U.S. agency official had the role of lead U.S. government coordinator for trafficking in Mexico.

Furthermore, some U.S. government officials noted challenges in coordinating between officials in Washington, D.C., and those overseas. For example, a U.S. official in Thailand was unaware of a U.S.-funded project in the country until that project hosted a conference and requested additional funding from the U.S. embassy. The project had not been included in the list of antitrafficking activities in Thailand that the official received from State's trafficking office, which is based in Washington. According to some agency officials overseas, not knowing what other

agencies and bureaus plan to spend on antitrafficking activities in a particular country makes it difficult for them to determine how much of their budgets to allocate to antitrafficking activities. Although State's new Office of Foreign Assistance has begun to address the issue of better coordinating all U.S. foreign assistance by bringing together core State and USAID teams to discuss U.S. development priorities in each recipient country, some U.S. officials expressed uncertainty regarding which part of the U.S. government would be responsible for outlining a new country-level strategy and budget for combating trafficking.

U.S. Government-Funded Antitrafficking Projects Lack Some Key Monitoring Elements; Little Is Known about Project Impact Due to Difficulties in Conducting Evaluations

Antitrafficking project documents we reviewed generally include monitoring elements, such as an overarching goal and related activities; however, they often lack other monitoring elements, such as targets for measuring performance. Various other factors also make it difficult to evaluate the impact of antitrafficking projects. These factors include questionable estimates of the number of trafficking victims at the project level, which are needed to evaluate the effectiveness of specific antitrafficking interventions. Certain project elements may further impede evaluations, including short time frames and overly broad objectives. Because of these factors, few evaluations that determine impact have been completed. As a result, little is known about the impact of antitrafficking interventions.

U.S. Government-Funded Antitrafficking Projects Lack Some Important Monitoring Elements; State Is Taking Steps to Strengthen Monitoring

Most of the project documents we reviewed generally include one or more monitoring elements, but lack others. We reviewed documents for 23 U.S. government-funded antitrafficking projects in Indonesia, Thailand, and Mexico, which generally include statements of project goals and a description of activities.¹⁵ However, the majority of these documents lack a logic framework that clearly links activities with project-level goals, indicators, and targets. Specifically:

¹⁵To inform our site visits in Mexico, Indonesia, and Thailand, we requested project documents for U.S.-funded antitrafficking projects that were being implemented during the time of our review. These documents are not generalizable to a larger universe. We received documents for 23 projects. The projects are illustrative of the U.S. agencies' currently applied monitoring practices. The 23 projects were funded or implemented by 6 U.S. agencies: State (11), Labor (4), USAID (3), Justice (2), HHS (2), and DHS (1).

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- *Eighteen of the 23 projects do not clearly explain how activities will achieve stated goals.* For example, the project proposal for a State-funded project in Thailand does not provide clear linkages demonstrating how the training of local officials and screenings of a public awareness video will achieve the project's overall goal of reducing trafficking among vulnerable adolescents and women. In contrast, all 4 Labor-funded projects in Indonesia, Mexico, and Thailand clearly link project goals and activities. For example, 1 goal of a project in Mexico is to develop a system to identify networks of exploiters. Activities to achieve this goal include developing computer software and training government officials in its use.
 - *Twenty-one of the 23 projects identify indicators, but of these, only 10 specify targets by which performance is measured.* For example, a State-funded project in Thailand included the "number of victims rescued" and the "number of arrests of traffickers" as performance indicators, but did not set numerical targets for measuring performance. In contrast, a State-funded project implemented by IOM in Indonesia established an expected result that 500 victims of trafficking receive rehabilitation and reintegration assistance. For the 13 projects that did not specify targets, the performance standards to which grantees were held accountable were not clear. Of the 10 projects that did specify targets, 5 explained how targets were set. These 5 projects included all 4 of the Labor projects we reviewed.

Another element of monitoring project performance is to supplement implementing partners' reporting of programmatic and financial progress with independent review through site visits at the field level. For example, Labor officials reported that the International Labor Affairs Bureau's Office of Child Labor, Forced Labor, and Human Trafficking has engaged ILO's external auditor to conduct audits of a sample of ILO's international program for the elimination of child labor projects. This office also has contracted with a certified public accounting firm to conduct independent attestation engagements of its Education Initiative projects. Among the objectives of these audits and attestation engagements is an assessment of the accuracy and reliability of performance data from grantees' progress reports.

State G/TIP has 4 Washington, D.C.-based staff members who are responsible for overseeing projects in approximately 70 countries.¹⁶ G/TIP officials stated that because they cannot visit all of the projects, they rely on U.S. embassy staff to provide additional field-level oversight. However, the office has not established written guidance for conducting such oversight. During our fieldwork, an embassy official expressed frustration at the lack of clear guidance and procedures. Embassy officials also told us that they meet with project staff, but have other responsibilities that limit the time they can devote to overseeing antitrafficking projects. According to State's Bureau of Population, Refugees, and Migration (PRM) officials, the bureau has only 3 staff to monitor and oversee its antitrafficking projects currently being implemented in over 20 countries, and these staff cannot conduct site visits to all projects. PRM staff also stated that they review progress reports submitted by project implementers, but do not have a database or system for compiling the information they receive from the field.

To address some of these concerns, State officials told us that they are taking steps to strengthen monitoring, including developing new indicators and written guidance for monitoring antitrafficking projects. State G/TIP officials told us that they are developing a system of key indicators to better inform management decision making that would be consistently used for each of the three main types of antitrafficking programs—prevention, protection, and prosecution. State PRM and IOM, its key implementing partner, have also been involved in an effort to develop and standardize an indicator framework across IOM missions, although this effort was not completed during the time of our review. Officials stated that this effort will serve as a way to exchange ideas about best practices in different parts of the world and will provide managers with information on implementation needed to make decisions about current or future projects.

Factors Impede Evaluations of Antitrafficking Projects and Little Is Known about Project Impact

Various factors impede impact evaluations of antitrafficking projects. First, data on human trafficking are questionable, including estimates of the number of trafficking victims, making it difficult to determine a preproject baseline. Second, elements of project design, such as overly broad objectives or short project duration, diffuse potential impact. Because of these factors, it has been difficult to evaluate the effectiveness of

¹⁶State G/TIP officials told us that the office has had 4 program officers for only a few months. For more than a year, the office had 2 or fewer officers.

antitrafficking interventions, and few evaluations that determine impact have been completed. As a result, little is known about the impact of antitrafficking interventions.

Lack of Project-Level Baseline Estimates Limits Evaluations

The lack of accurate baseline estimates of the number of trafficking victims is a limitation to conducting evaluations. As we have previously reported, the accuracy of current estimates is questionable.¹⁷ Without estimates of the scope of human trafficking to use as baselines in project locations, it is very difficult to determine where interventions are most needed or where interventions would have the greatest impact. Developing baseline estimates is difficult for the following reasons:

- *Victims are a hidden population.* Victims may be unaware, unwilling, or unable to acknowledge that they are trafficking victims. Therefore, it is difficult to reach them to collect information using standard sampling techniques.
- *Service providers may be unwilling to share victim data due to confidentiality concerns.* For example, the global database maintained by IOM¹⁸ is not publicly available since assisted victims are in a precarious position and revealing their identity could have a detrimental effect on their safety.¹⁹
- *The definition of the term “trafficking in persons” is broad and varies in meaning across different languages.* As we previously discussed, the understanding of trafficking varies across languages and cultures. These variations in definition hinder the comparability of data across countries and organizations.
- *There are no commonly agreed-upon criteria for identification of human trafficking victims.* This lack of criteria hinders the ability to

¹⁷GAO-06-825.

¹⁸IOM has the only global database, which contains systematically collected standardized data on actual victims assisted by IOM. According to IOM, 30 missions input data into the global database in 2007. The information covers information about trafficked victims from more than 100 source and destination countries.

¹⁹In commenting on a draft of this report, IOM noted that it can share with external parties nonpersonal aggregate data from the database upon written request. The IOM Counter-Trafficking Division also produces quarterly statistical reports based on the data from the database.

identify victims, create consistent statistical databases, and design analytical tools for surveys and estimates.²⁰

- *Existing data may not be reliable.* Developing countries, which are typically the countries of origin, have limited capacity for data collection, and their governments' commitment to combating trafficking may be insufficient. Thus, sufficiently reliable data needed for estimating trafficking incidence may not be available.

Elements of Project Design Impede Evaluations

Elements in the design of certain antitrafficking projects, including a tendency to focus on very broad, high-level objectives across a diverse range of activities, diffuse projects' potential impact and create challenges for evaluations.

When projects focus on overly broad objectives and contain too many types of activities, their potential impact is diffused, which makes them difficult to evaluate.²¹ For example, some antitrafficking projects have very high-level goals or objectives, such as "creating an environment for effective action against trafficking," or "strengthening the initiatives of government and others against human trafficking" and contain activities covering 2 or more of the 3 key types of antitrafficking interventions—prevention, protection, and prosecution. Of 153 U.S. international antitrafficking projects funded in fiscal year 2004, 2005, or 2006, 56 percent included 2 or more of these interventions and 29 percent included all 3 interventions. Activities included public awareness campaigns, victim assistance, and training for law enforcement officials.

While projects funded with greater resources could lead to more noticeable longer-term changes, the impact of a shorter-term, smaller-scale intervention may be difficult to attribute and quantify. Antitrafficking projects vary significantly in terms of their time frames and funding levels. For example, the projects we reviewed varied in duration from 1 year to

²⁰G/TIP, in collaboration with PRM, IOM, and other organizations, is currently developing core indicators in an attempt to work toward commonly agreed-upon criteria for victim identification and assistance as well as for data collection and analysis.

²¹In commenting on a draft of this report, ILO suggested that it is useful to clearly define the scope of the impact that can be measured within the time frame and levels of results. For example, the expected impact on trafficking differs depending on whether one is looking at one project only, a collection of projects from one source of funding within a country, all of the projects and activities within a country, or the impact of all projects in all countries from one source of funding.

about 4 years, and projects' funding levels varied from \$15,000 to \$6 million. Officials stated that some organizations, such as State G/TIP, tend to fund smaller, shorter-term projects, while Labor usually funds larger, longer-term projects. Overall, experts told us that organizations also have generally limited funding for impact evaluations and for research on the nature and scope of human trafficking.

Experts stated that another factor impeding evaluations is that little attention has generally been devoted at the start of projects to evaluation design. For example, questions related to determining the control group, the type of design for impact evaluation, the data that would be collected, and the analytical methods that would be most suitable are often not addressed before implementation. Furthermore, experts stated that although projects target several groups of beneficiaries, it is generally unclear how they can be reached and to which group they would be compared. As a result, it is difficult to determine what would constitute successful project implementation.

Little Is Known about Project Impact

Because of the difficulties in evaluating antitrafficking projects, the few evaluations that have been completed are qualitative rather than quantitative, focus on process rather than impact, and rarely trace victims over time.

The few evaluations completed used qualitative methods that are valuable for documenting victims' perceptions and experiences, but, unlike quantitative methods, they cannot be used to generalize results to broader populations.²² For example, IOM's Office of Inspector General has carried out impact evaluations of a select number of antitrafficking projects. Our review of these evaluations shows that they covered interventions in various parts of the world funded by different donors. All of the available evaluations applied qualitative methodologies, consisting of document reviews, site visits, interviews, and focus groups with stakeholders. In addition, in a USAID-funded assessment of child trafficking victims residing at a shelter in Nepal, an evaluator used qualitative methods, such as observations and interviews, to collect information on their daily lives, needs, and preparation for reintegration into the community. The evaluator concluded that skill-based training provided by the shelter does not adequately prepare the girls for their reintegration into their communities;

²²Agencies have required or employed various qualitative methodologies such as interviews, focus group discussions, direct observation techniques, and rapid assessment techniques.

however, this qualitative result could not be generalized to the national level.

Completed evaluations also typically focused on process rather than impact.²³ Process evaluations are an important tool for improving service delivery and assessing program effectiveness by assessing whether activities conform to program design. Impact evaluations assess the net effect of a program by comparing program outcomes with an estimate of what would have happened in the absence of the program. However, impact evaluations are an emerging field in antitrafficking interventions. For example, a process evaluation of a Labor-funded project aimed at reducing the victimization of minors who have been trafficked or are at risk of being trafficked in Thailand focused on the project's planning, implementation, and management. This process evaluation was designed to monitor implementation and assess project outcomes. However, the evaluation did not ultimately assess the project's impact in reducing the victimization of minors.

Finally, our review identified few evaluations that track individual victims who have been reintegrated into their communities over time. For example, ILO is currently pilot-testing an application of a tracer study methodology in the context of trafficking prevention. In addition, according to Labor officials, in some cases the office has conducted follow-up studies that examine a sample of beneficiaries to document changes that have occurred. Furthermore, IOM officials noted that several of its missions provided statistical information to gauge the success of its victim reintegration efforts over time based on specific indicators.²⁴ According to experts, such evaluations are costly and time-consuming. Tracking victims by country can also be difficult because country boundaries are permeable and many trafficking routes cross national borders.

²³According to GAO's *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-05-739SP](#) (Washington, D.C.: May 2005), there are four types of evaluations: process, outcome, impact, and cost-benefit analysis.

²⁴For example, according to IOM officials, IOM's mission in Kiev uses indicators such as employment rates, reinsertion into the educational system, return abroad, and re trafficking as tools for its caseload management by identifying more-effective mechanisms for victim identification and referral.

Expert Panel Identified Ways to Address the Difficulties of Monitoring and Evaluating Antitrafficking Projects

A GAO-convened panel of experts identified and discussed ways to address the factors that make it difficult to monitor and evaluate antitrafficking projects. Panelists suggested approaches to improve the monitoring and evaluation of antitrafficking projects, by improving information on the severity of human trafficking and addressing weaknesses in the design of antitrafficking projects.

Conduct Research on the Nature and Severity of Human Trafficking

Panelists acknowledged that the lack of existing data on the nature and severity of human trafficking limits evaluations of antitrafficking projects, and suggested ways to improve information on the nature and severity of human trafficking. According to the panelists, researchers need to gather evidence to answer the following questions:

- *What is the nature and severity of human trafficking?* Panelists stated that it is necessary to understand the nature of trafficking in terms of its underlying conditions and the types of traffickers and victims. Trafficking is a multidimensional, complex problem that involves a wide range of victims; recruiters, brokers, and intermediaries; and abusive employers and sexual exploiters. Understanding the incentives of the people engaged in trafficking is an important first step.

The severity of human trafficking can be measured by using qualitative and quantitative methodologies. Panel members suggested several sampling methods that have been used to sample other hard-to-reach populations, including the homeless, hidden migrants, missing and exploited children, domestic violence victims, inmates, and drug users. One suggested method is sampling of “hot spots”—an intensive search for victims in areas known to have high concentrations of victims or in areas to which many victims return. Other methods include adaptive cluster, double, indirect, and snowball sampling. (For a more detailed discussion of sampling methods, see app. III.) These methods could be used individually or in combination. Panelists further emphasized that, whenever feasible, it is important to use methodologies that are appropriate for the location sampled. In addition, it is critical to determine whether the results are unique to a certain location or whether they can be generalized to other locations. Panelists recommended that research start at the local level. Such research would identify successful small-scale interventions, increase the knowledge of

victims' needs, and develop meaningful performance measures. Lessons learned at the local level could then be expanded to national and regional levels.

- *What is the projects' estimated effect on the nature and severity of human trafficking?* Panelists emphasized the necessity of designing rigorous methods to evaluate antitrafficking projects, such as randomized control trials.²⁵ For example, as baseline estimates in trafficking hot spots are obtained and interventions are undertaken in that location to reduce trafficking, the use of "place-randomized trials"²⁶ for evaluation would become possible. To determine the interventions' impact, data obtained from interventions in hot spots could then be compared with locations where there had been no interventions. Although randomized trials may be difficult to execute for many trafficking projects, they are important ways to generate evidence about interventions' effectiveness. Randomized trials should be pilot-tested in carefully chosen settings so that the evaluator can identify and correct any problems encountered before expanding the trials to larger populations or areas. Panelists pointed out that such rigorous evaluation has occurred in the fields of public health and criminal justice. For example, a randomized study was done of brothels in Thailand to obtain information on the HIV/AIDS rates of prostitutes.

Address Monitoring and Evaluation Weaknesses in the Design of Antitrafficking Projects

To address weaknesses in project design that impede monitoring and evaluation, such as projects with very broad, high-level objectives, panelists made the following recommendations:

²⁵According to the Office of Management and Budget (OMB), randomized control trials meet the highest standards of impact evaluation and should be used whenever feasible. As defined by OMB's guidance, a randomized controlled trial is "a study that measures an intervention's effect by randomly assigning individuals or other units into an intervention group, which receives the intervention, and into a control group, which does not. At some point following intervention, measurements are taken to establish the difference between the intervention group and the control group." However, randomized controlled trials are not suitable for every program and generally can be employed only under special circumstances. See OMB, "What Constitutes Strong Evidence of a Program's Effectiveness?" (http://www.whitehouse.gov/omb/part/2004_program_eval.pdf).

²⁶A place-randomized trial is a study in which a number of places are randomly assigned to two or more interventions to learn which intervention works best.

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- *Develop a logic framework.* Given the weaknesses of some antitrafficking projects that have overly broad objectives across a diverse range of activities, panelists suggested that officials design projects with a logic framework that has clear objectives and narrow the focus of interventions. They also recommended that officials design projects that clearly link activities to intended outcomes, identify measurable indicators, and establish procedures for setting and modifying targets. Measurable indicators with mutually agreed-upon targets allow project officials to assess how a project is achieving its overall goals and objectives. For example, a Labor-funded project implemented by ILO in Mexico includes a logic framework that links project activities and outputs to outcome objectives, and includes clear indicators and means of verification. The project's overall goal of eliminating the commercial sexual exploitation of children in Mexico links to four immediate objectives that, in turn, link back to project activities and outputs. One objective—that at least 300 child victims of sexual exploitation or at-risk children and their families receive assistance—is linked to 28 activities and 8 outputs, such as increasing families' employment opportunities. These 28 activities include disseminating employment promotion programs, organizing employment training, and monitoring and analyzing the impact of these dissemination and training efforts. Panelists emphasized that donors and implementers should agree on the project's logic framework during the design phase.
 - *Determine whether a project is ready to be evaluated.* Given the significant variance in project duration and funding levels, panelists emphasized that evaluators would not be able to evaluate all existing projects, but should first determine which projects are ready to be evaluated. In conducting such "evaluability assessments," evaluators determine, among other things, whether (1) the project is large enough, has sufficient resources, and has been implemented long enough to make an impact; (2) the project is reaching its target population; (3) project documents specify and clearly link objectives, goals, and activities; and (4) sufficient information exists to determine impact. For example, larger, long-term projects are more likely to have an impact and, thus, may be better candidates for evaluation than smaller, short-term projects. Because larger antitrafficking projects generally include a diverse range of interventions, panelists suggested narrowing the evaluation to focus on discrete interventions or aspects of the project.

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- *Build monitoring and evaluation into project design.* Given that evaluation is not generally considered during design, panelists emphasized that project officials should consider how the project will be evaluated before the project is implemented. Most importantly, organizations need to define the project's intended impact and how that impact will be measured. To do this, organizations would have to determine the project beneficiaries and to which group they would be compared, the data they would have to collect, and how they would analyze those data. Management would not only need to collect data during implementation to monitor if the project works according to plan, but also collect data before and after implementation to determine what works best.

Conclusions

The United States has played an important role in combating global human trafficking and spurring other governments to increase their efforts in doing so. As organizations around the world increasingly collaborate in combating trafficking, their ultimate success will depend on the extent to which they are able to overcome difficult challenges, such as varying levels of government commitment and capacity, that have impeded collaboration in the past. More than 7 years after the passage of the UN protocol, little is known about which interventions have been the most effective in preventing human trafficking, protecting victims, and prosecuting traffickers.

The United States and other governments, international organizations, and NGOs continue their efforts to fight trafficking, but there is little information available to inform their decisions about project implementation and selection. Although antitrafficking projects contain some important elements for monitoring, they often lack other important elements for measuring performance on a real-time basis, such as targets. Such elements are critical in monitoring project performance to determine whether interventions are being implemented as expected, or whether they need to be changed to better combat human trafficking. Evaluation is also important in determining whether antitrafficking projects have been effective. However, few impact evaluations have been completed due to the difficulties involved. As a result, little is known about the impact of antitrafficking interventions.

Given the grave personal suffering of victims and negative impacts on society that human trafficking creates, strengthening collaboration, monitoring performance, and evaluating impact are important to ensure

that organizations fund antitrafficking interventions with the greatest impact, where they are most needed, and through the effective and efficient use of resources.

Recommendations for Executive Action

We recommend that the Secretaries of State and Labor and the Administrator of USAID improve the monitoring and evaluation of their projects to combat global human trafficking by considering the following actions, where appropriate:

1. Improve information about project impact on the nature and severity of human trafficking, including
 - developing better data about the incidence of trafficking at the project level and
 - applying rigorous evaluation methodologies.
2. Address monitoring and evaluation weaknesses in the design of antitrafficking projects, including
 - developing a framework that clearly links activities with project-level goals, indicators, and targets;
 - conducting “evaluability assessments” to determine whether a project is ready to be evaluated; and
 - building monitoring and evaluation into project design before the project is implemented.

We are addressing our recommendations to State, Labor, and USAID because they provided the most U.S. funding for projects to combat global human trafficking.

Agency Comments and Our Evaluation

We requested comments on a draft of this report from the Secretaries of State, Justice, Health and Human Services, Homeland Security, and Labor; the Administrator of USAID; and cognizant officials at UNODC, IOM, ILO, OAS, OSCE, the World Bank, IDB, and ADB or their designees. We received written comments from State, Labor, USAID, and HHS, which are reprinted in appendixes IV, V, VI, and VII along with our responses to specific points.

In its comment letter, State noted that it will implement the recommendations in the report in ways that are relevant and appropriate to the mandates of the State offices working on antitrafficking efforts. State further noted that the recommendations are entirely consistent with the department's current activities and direction. State also generally agreed that the antitrafficking field is well-served by more information about the nature and severity of human trafficking and recognized that effective project design is critical to successful project implementation and program monitoring and can lay the foundation for evaluation. However, State disagreed with our finding that monitoring is limited, stating that monitoring is in place at the department and improving. While we recognize that State and other U.S. agencies have certain elements of monitoring in place, we report that they lack others. For example, we found that for the 23 antitrafficking projects we reviewed, the majority do not have a logic model that clearly explains how activities are linked to project goals. In addition, the majority of these projects do not specify targets that will establish benchmarks for measuring performance. State also emphasized that many of its projects are designed to be of more limited size, scope, and duration than those of other agencies, such as Labor. State further noted that these projects of limited duration are worthy of funding, but are not necessarily appropriate for evaluation. In the report, we state that the impact of a shorter-term, smaller-scale intervention may be difficult to attribute and quantify.

Labor commented that the report provides a good overall assessment of international cooperation and the need to enhance collaboration among key agencies and governments regarding antitrafficking efforts. Labor also commented that the report highlights important areas for improving monitoring and evaluation of U.S.-funded antitrafficking programs. However, Labor stated that the report does not fully reflect efforts particular federal agencies are taking in the monitoring and evaluation of antitrafficking projects. As an example, Labor stated that it uses several mechanisms, including audits and process evaluations, in its monitoring and oversight of international technical assistance projects, including antitrafficking projects, to ensure that U.S. funds lead to planned outputs and results. In response, we made additions or revisions to the text to further clarify Labor's monitoring and evaluation efforts. We believe the overall monitoring of antitrafficking projects is limited because the projects funded by the other five agencies did not have the elements of monitoring we found in Labor's projects.

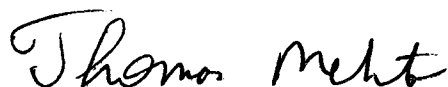
USAID said it appreciates the thoughtfulness of GAO's report. USAID also commented that it is concerned with the challenges of coordination, monitoring, and evaluation, and that while it has made considerable efforts to coordinate within the U.S. government and with other organizations, it will continue to work within the interagency process in Washington and in the field. USAID also agrees that monitoring and evaluation of its antitrafficking efforts are very important and that they rely on the availability of both human and financial resources. USAID further agrees that the issues inherent in the evaluation of antitrafficking activities are particularly challenging because there is no baseline against which to measure progress.

HHS said the report is a sound document that substantively covers the wide range of programs and services available to combat human trafficking.

We also received technical comments from Justice and DHS, as well as from UNODC, IOM, ILO, OAS, OSCE, the World Bank, IDB, and ADB, which we have incorporated in the report as appropriate.

We are sending copies of this report to interested congressional committees; the Secretaries of State, Justice, Health and Human Services, Homeland Security, and Labor; the Administrator of USAID; ILO; IOM; and UNODC. We will also provide copies to others on request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staffs have any questions about this report, please contact me at (202) 512-9601. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VIII.



Thomas Melito
Director, International Affairs and Trade

Objectives, Scope, and Methodology

Our objectives were to examine (1) collaboration among organizations involved in international antitrafficking efforts, (2) U.S. government agencies' monitoring of antitrafficking projects and difficulties in evaluating these projects, and (3) suggestions for strengthening monitoring and evaluation.

To examine collaboration among organizations involved in international antitrafficking efforts, we reviewed relevant planning, funding, and project documents on human trafficking from the Departments of State, Justice, Labor, Homeland Security, and Health and Human Services and the U.S. Agency for International Development (USAID). We reviewed planning and project documents from relevant United Nations (UN) and other international agencies and offices, including the UN Office on Drugs and Crime (UNODC), International Labor Organization (ILO), International Organization for Migration (IOM), United Nations Children's Fund (UNICEF), and UN High Commissioner for Refugees (UNHCR). We also reviewed UN reports and resolutions that address coordination as well as documents from regional organizations, such as the Organization for Security and Cooperation in Europe (OSCE), the Coordinated Mekong Ministerial Initiative Against Trafficking (COMMIT), and the Regional Conference on Migration.

In addition, we reviewed documents from and discussed international antitrafficking efforts with officials from the above agencies and organizations as well as officials from host government, donor government, and nongovernmental organizations (NGO), in Washington, D.C., and during our fieldwork in Indonesia, Thailand, and Mexico. We also reviewed documents describing these countries' national mechanisms to combat trafficking, including legislation and action plans, where applicable. We selected Thailand because it is the country with the largest number of international organizations working to combat human trafficking. We selected Indonesia and Mexico because they receive a large amount of U.S. funding for international antitrafficking projects and have a relatively large number of U.S. government agencies and international organizations working in each country. All 3 countries are origin, transit, and destination countries for human trafficking victims and have projects addressing prevention, protection, and prosecution.

To examine organizations' monitoring and evaluation of antitrafficking programs, we reviewed documentation from 23 projects in the 3 countries we visited and illustrative projects from other countries. We worked with U.S. agency officials in Washington and in the field to identify U.S.-funded

antitrafficking projects in Indonesia, Thailand, and Mexico that were ongoing during the time of our review (August 2006 to June 2007). We requested project documents—including proposals, grant agreements, and progress reports—from these U.S. officials for projects identified in these countries. In response to this request, we received documents for 23 antitrafficking projects that were funded or implemented by 6 U.S. agencies involved in international antitrafficking efforts. We examined the project documents for the following elements: statement of goals or objectives, statement of activities, identification of indicators and targets, explanation of how targets were selected, and inclusion of a logic model or framework. While we recognize that these 23 projects may not be the complete universe of antitrafficking projects in these 3 countries, we consider these 23 projects sufficient for the purposes of our review.¹ Although we cannot assume that the issues we identified exist across all projects, they nevertheless represent areas for improvement in monitoring antitrafficking projects. We also reviewed a set of 4 State Office to Combat and Monitor Trafficking in Persons (G/TIP) antitrafficking projects in India, Israel, Afghanistan, and Costa Rica. These projects were selected to illustrate some current monitoring and evaluation practices for existing projects in different parts of the world and different types of exploitation. They showed the variation in monitoring practices that can only increase with sample size. Thus, the projects provided the background information and context needed to understand State G/TIP's current efforts to standardize monitoring requirements. The reviewed documents for all projects included proposals, applications for assistance, project descriptions, strategy papers, concept papers, causal models, cooperative or grant agreements, and periodic and final reports.

We also reviewed articles and books on monitoring, evaluation, and statistics, such as *Sampling* by Steven K. Thompson, Wiley Series in Probability and Mathematical Statistics (1992); *Adaptive Sampling* by Stephen K. Thompson and George A.F. Seber, Wiley Series in Probability and Mathematical Statistics (1996); *Better Evaluation for Evidence-Based Policy: Place Randomized Trials in Education, Criminology, Welfare, and Health* by Robert Baruch, The Annals of the American Academy of Political and Social Science (2005), vol. 599, 6-18; *Program Evaluation Methods: Measurement and Attribution of Program Results*, Third

¹We could not determine the universe of projects currently being implemented in these three countries because multiple U.S. agencies are involved in international antitrafficking efforts and there is no one central repository to identify all U.S.-funded projects.

Edition, Treasury Board of Canada, Secretariat; and *Monitoring and Evaluation: Some Tools, Methods and Approaches*, the World Bank (2004).

To examine suggestions for strengthening monitoring and evaluation, we worked with the National Academy of Sciences to organize a 2-day expert panel on challenges and alternative strategies for monitoring and evaluating the results of international antitrafficking programs and projects in April 2007. We invited the following groups of panel participants:

- Experts with broad-based, subject-area knowledge of human trafficking.
- Experts with specialized knowledge of monitoring and evaluation of programs aimed at hidden populations similar to trafficking victims, such as the homeless and irregular migrants. This group included experts with specific knowledge of baseline data estimation of such populations.

Panelists had backgrounds in academia, research, consulting, and project implementation in the field. Using a nominal group technique, panelists chose to focus on the intervention “safe return” as a starting point for discussion. Experts provided presentations and participated in a discussion and cross-fertilization of ideas. Using a nominal group technique, panel members also ranked two topics in order of importance to the human trafficking field—estimating the number of trafficking victims and evaluability assessments. None of the panel members were compensated for their work on this project. The following experts participated in the panel:

- Richard Berk, Professor of Criminology and Statistics, Department of Criminology, University of Pennsylvania
- Robert Boruch, University Trustee Chair Professor, Graduate School of Education and Statistics Department, Wharton School, University of Pennsylvania
- Mario Thomas Gaboury, Professor and Chair of Criminal Justice, University of New Haven
- Adele Harrell, Consultant
- Kristiina Kangaspunta, Chief, Anti-Human Trafficking Unit, United Nations Office on Drugs and Crime

-
- Jonathan Martens, Counter-Trafficking Project Specialist, Counter-Trafficking Division, International Organization for Migration
 - Jeffrey S. Passel, Senior Research Associate, Pew Hispanic Center
 - Lisa Rende-Taylor, Technical Advisor to the United Nations Inter-Agency Project on Human Trafficking in the Greater Mekong Subregion
 - Peter Reuter, Professor, School of Public Policy, Department of Criminology, University of Maryland
 - W. Courtland Robinson, Assistant Professor, Center for Refugee and Disaster Response, Johns Hopkins Bloomberg School of Public Health
 - Debra Rog, Associate Director, Westat Corporation
 - Jane Nady Sigmon, Senior Coordinator for International Programs, Office to Monitor and Combat Trafficking in Persons, U.S. Department of State

We conducted our review from August 2006 to June 2007 in accordance with generally accepted government auditing standards.

Selected International Organizations Involved in Combating Human Trafficking

This appendix describes the general mission and antitrafficking activities of 15 international organizations that implement international antitrafficking projects.

Table 3: Selected International Organization Missions and Activities to Combat Human Trafficking

Organization/General mission	Activities to combat human trafficking
Worldwide organizations	
United Nations Office on Drugs and Crime (UNODC): Assist member countries to combat illicit drugs, crime, and terrorism.	As the Secretariat of the Conference of the Parties to the UN Convention against Transnational Organized Crime and its protocols, including the Trafficking in Persons Protocol, UNODC is required to “ensure the necessary coordination with the secretariats of relevant international and regional organizations.” UNODC’s Global Program to Combat Trafficking in Persons comprises data collection, assessment, and technical cooperation.
International Labor Organization (ILO): Promote social justice and internationally recognized human and labor rights. The ILO Declaration on Fundamental Principles and Rights at Work expresses the commitment of governments and employers’ and workers’ organizations in four areas, including the elimination of forced, compulsory, and child labor.	The International Program on the Elimination of Child Labor aims to eliminate child labor by strengthening national capacities and creating a worldwide movement to combat it. The Special Action Program to Combat Forced Labor seeks to • raise global awareness and understanding of forced labor; • assist governments to develop and implement new laws, policies, and action plans; • develop and disseminate guidance and training materials on forced labor and trafficking; and • implement programs that integrate policy, institutional capacity building, and direct support for the prevention of forced labor and identification and rehabilitation of victims.
International Organization for Migration (IOM): Ensure the orderly and humane management of migration, to promote international cooperation on migration issues; to assist in the search for practical solutions to migration problems; and to provide humanitarian assistance to migrants, including refugees and internally displaced people.	IOM’s counter-trafficking projects primarily aim to prevent human trafficking, and to protect victims while offering options of safe and sustainable reintegration and/or return. Activities include: • Information campaigns that educate the public about human trafficking and equip vulnerable populations with the information necessary to protect themselves from the recruitment tactics of traffickers. • Research on human trafficking that explores routes and trends, the causes and consequences of human trafficking as well as the structures, motivations, and <i>modus operandi</i> of organized criminal groups. • Direct assistance to trafficking victims that provides accommodation in safe places, medical and psychosocial support, skills development and vocational training, reintegration assistance, and the options of voluntary and dignified return to the country of origin or resettlement to a third country in extreme cases. • Technical cooperation that builds the capacity of government and civil society institutions to better address the challenges posed by human trafficking through specialized training and technical support in the development of counter-trafficking policies and procedures, legal frameworks, and infrastructural upgrades.

Appendix II
Selected International Organizations
Involved in Combating Human Trafficking

(Continued From Previous Page)

Organization/General mission	Activities to combat human trafficking
United Nations Children's Fund (UNICEF): Advocate for the protection of children's rights, help meet children's basic needs, and aim to expand their opportunities.	UNICEF's Child Protection Program focuses on • government commitment and capacity; • legislation and enforcement; • attitudes, customs and practices; • open discussion; • children's life skills, knowledge, and participation; • family and community capacity; • essential services, including prevention, recovery, and reintegration; and • effective monitoring, reporting, and oversight.
Joint United Nations Program on HIV/AIDS (UNAIDS): Support efforts of 10 UN system organizations to help the world prevent new HIV/AIDS infections, provide care for those already infected, and mitigate the impact of the epidemic.	Using a human rights approach, UNAIDS aims to address the root causes of human trafficking, including poverty, limited access to education and jobs, and social and cultural attitudes and practices that devalue women, girls, and children. UNAIDS promotes law enforcement and other activities to prevent trafficking; protect victims; punish traffickers; and target demand for the services of trafficked workers, women, and girls. UNAIDS also advocates for voluntary counseling and testing, the provision of HIV care and treatment services, and the elimination of stigma and discrimination.
United Nations Development Program (UNDP): Increase knowledge, experience, and resources to developing countries in such areas as poverty, HIV/AIDS, energy and the environment, democratic governance, and crisis prevention and recovery. Focus on encouraging human rights and women's empowerment.	UNDP approaches trafficking as a voluntary and involuntary migration issue. UNDP aims to identify the factors that increase women's and girls' vulnerability to trafficking and to develop responses for the facilitation of safe mobility.
United Nations Educational, Scientific, and Cultural Organization (UNESCO): Promote international cooperation in the fields of education, science, culture, and communication.	UNESCO undertakes policy-oriented research on specific factors leading to the trafficking of women and children in pilot countries in Africa and Asia. The Project to Fight Human Trafficking in Africa aims to promote effective and culturally appropriate policymaking to combat trafficking in Western and Southern Africa. It organizes training workshops for policymakers, NGOs, community leaders, and the media to raise awareness and inspire innovative policymaking. The Trafficking and HIV/AIDS Project attempts to solve the problems of HIV/AIDS, trafficking, and nontraditional drug use in the Greater Mekong subregion, by researching, developing, and implementing programs that work to support sustainable, locally managed projects with ethnic minorities.
United Nations Development Fund for Women (UNIFEM): Provide financial and technical assistance to programs and strategies to foster women's empowerment and gender equality. Cover the gender issues of HIV/AIDS, poverty, economics, and violence.	UNIFEM addresses the trafficking of women within the context of violence against women—as a violation of their human rights and as a development issue.
United Nations High Commissioner for Refugees (UNHCR): Coordinate international action to protect refugees and resolve refugee problems worldwide.	UNHCR provides a safeguard to the rights and well-being of refugees so that they can exercise the right to seek asylum and find safe refuge in another country, with the option to return home voluntarily, integrate locally, or resettle in a third country.

Appendix II
Selected International Organizations
Involved in Combating Human Trafficking

(Continued From Previous Page)

Organization/General mission	Activities to combat human trafficking
Regional organizations	
Organization for Security and Cooperation in Europe (OSCE): Address a wide range of security concerns, including arms control, confidence- and security-building, human rights, national minorities, democratization, policing strategies, counterterrorism, antitrafficking, and economic and environmental activities.	The Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings supports the development and implementation of antitrafficking policies in OSCE participating countries. In addition, the office coordinates the activities of OSCE bodies, promotes cooperation among the participating states, and raises the public and political profile of trafficking in persons. The Office for Democratic Institutions and Human Rights assists countries in preventing trafficking and protecting victims by • supporting the establishment of national referral mechanisms, • improving victim identification and assistance, and • enhancing trafficking victims' awareness of their rights. The Office of the Coordinator of OSCE Economic and Environmental Activities aims to address both the demand and supply side of trafficking in human beings by • promoting self-regulation of the private sector; • raising the awareness of trafficking in countries of destination, in particular in western countries; and • creating economic empowerment opportunities for potential victims of trafficking in countries of origin. The OSCE Secretariat's Action Against Terrorism Unit, Conflict Prevention Center, Strategic Police Matters Unit, Border Unit, the Office of the Senior Gender Adviser, and field offices are also engaged in combating human trafficking.
Organization of American States (OAS): Strengthen cooperation on democratic values, defend common interests, and debate the major issues facing the western hemisphere and the world.	The Anti-Trafficking in Persons Section's goals are to carry out antitrafficking efforts with a regional perspective that allows OAS to address human trafficking in a way that is difficult for any single national government. The section provides the necessary logistical information for training seminars, technical assistance to governments, exchange of information, and proposals. Also, the section develops new information, monitors new literature in the field, and catalogues existing reports and documents. The focus of antitrafficking efforts consists of • broadening awareness and understanding of trafficking in persons, • sharing information with governments and civil society, • identifying policies that will reduce human trafficking, • working with officials on implementing concrete antitrafficking measures, and • identifying new partners and financial resources for fighting trafficking in the hemisphere. Four key areas of action are to • foster national action by governments; • advance effective antitrafficking best practices in prevention, protection, investigation, and prosecution; • gain new allies for the hemisphere; and • implement existing antitrafficking projects and training programs as well as develop new ones.

Appendix II
Selected International Organizations
Involved in Combating Human Trafficking

(Continued From Previous Page)

Organization/General mission	Activities to combat human trafficking
Association of Southeast Asian Nations (ASEAN): Accelerate economic growth, social progress, and cultural development for the participating countries in the southeast region of Asia. Promote regional peace and stability through respect for justice and the rule of law.	In 1997, ASEAN member countries signed the Declaration on Transnational Crime, which commits members to taking measures to combat transnational crimes, including human trafficking. The organization's work program to implement this declaration includes actions to enhance information exchange, increase awareness of trafficking, support the criminalization of trafficking, and develop regional training programs. In 2004, ASEAN member countries signed the Declaration Against Trafficking in Persons, Particularly Women and Children, which commits members to establishing a regional focal network to combat trafficking and adopting measures to prevent the fraudulent use of identity documents, among other things.
Multilateral development banks	
World Bank: Provide financial and technical assistance to developing countries to promote education, health, infrastructure, and communications to reduce global poverty and improve living standards.	The World Bank conducts analytical work on topics, such as gender or migration, that may address the incidence of and factors leading to human trafficking and child labor. The International Finance Corporation supports job creation and skills improvement projects in Asia that assist vulnerable populations, including human trafficking victims. In addition, the corporation applies its performance standard related to child labor to the projects it finances, in an effort to help client companies assess and manage these issues.
Asian Development Bank (ADB): Reduce poverty in Asia and the Pacific. ADB helps improve the quality of people's lives by providing loans and technical assistance for a broad range of development activities.	ADB conducts regional research addressing the incidence and factors leading to the trafficking of women and children in Asia. Where trafficking vulnerabilities are identified, ADB recommends that its borrowers include an antitrafficking component (normally involving community and laborer awareness raising, targeted poverty reduction program for women and children, and capacity building of NGOs and community groups) often in conjunction with an HIV/AIDS prevention component. ADB also facilitates policy dialogues within and among countries in Asia, especially through its active regional cooperation assistance.
Inter-American Development Bank (IDB): Contribute to the acceleration of the process of economic and social development of the regional developing member countries.	IDB seeks opportunities within its Poverty Reduction and Social Equity and Social Development Strategies to address the issue of human trafficking in its borrowing member countries. IDB promotes mainstreaming the subject in the traditionally financed operations in the areas of violence, social exclusion, attention to vulnerable groups, gender, citizen security, justice reform, and corruption. IDB encourages countries to include human trafficking in their country strategies and provides technical assistance grants and citizen security loans with trafficking elements. In addition, IDB has launched communications campaigns to improve awareness and visibility of human trafficking and promote the use of emergency hotlines, which are also used to gather information on origin and destination locations of trafficking victims and trafficking routes.

Sources: International organizations and development banks.

Methods Suggested by Expert Panel to Estimate the Number of Human Trafficking Victims

This appendix describes the sampling methods suggested by a GAO-convened panel of experts to estimate the number of human trafficking victims.

Table 4: Sampling Methods Suggested by Expert Panel to Estimate the Number of Human Trafficking Victims

Method	Description of method	Application to human trafficking
Stratified random sampling to oversample rare units	The population is divided into subgroups, and random samples are selected from each subgroup.	Geographic areas are divided into subareas, which allows for a more-intensive search of cases in trafficking “hot spots.”
Double sampling	After selecting a sample of primary units to obtain preliminary estimates, a sample of secondary units is selected to obtain more accurate counts.	First, a preliminary estimate of human trafficking cases is obtained from reported cases in certain geographic areas. Second, a more precise estimate of actual victims is obtained by focusing on the areas with a higher concentration of reported cases.
Adaptive cluster sampling	After an initial set of units is selected, additional units in its neighborhood are added to the sample.	After an initial trafficking case is identified, additional cases in its “vicinity” are identified. The goal is to find clusters that are usually defined geographically.
Capture-recapture sampling	Two random samples are independently drawn, and the number of common and different units is used to estimate the size of the population.	Two random samples of reported trafficking cases are independently drawn, and the number of common and different cases is used to estimate the total number of reported cases. ^a
Indirect sampling	A “sisterhood approach” to sampling involves sampling a related population that is not as difficult to sample as the population of interest. An estimate is obtained by using the relationship between the “hard-” and “easy-to-reach” populations.	Relatives or friends of trafficking victims are interviewed, and an estimate is obtained on the basis of the relationship between the two groups.
Sentinel site surveillance	A nonrandom sample of sites is selected over time to observe changes in characteristics.	Sites with higher concentrations of trafficking cases can be identified and observed over time to determine whether there is a change in the number of victims found or rescued, or both.
Snowball sampling	An initial observation is taken and augmented by the participants. This is a participant-driven approach.	An identified victim identifies other victims with whom he or she has been in contact. In turn, these victims identify others.
Model-based estimator	A model of human trafficking is developed, followed by empirical work aimed at obtaining parameter estimates.	Based on the underlying relationships of a human trafficking model, a multiplier of identified cases is used to extrapolate to a total or aggregate estimate.
Use of decoys	Decoys are used to estimate an elusive population. For example, the U.S. Census Bureau used decoys in studies of the homeless to estimate how many of the homeless were not found.	An initial estimate of reported victims can be adjusted on the basis of the number of decoys that are not found by the enumerators to account for victims who may have been missed.

Appendix III
Methods Suggested by Expert Panel to
Estimate the Number of Human Trafficking
Victims

(Continued From Previous Page)

Method	Description of method	Application to human trafficking
Random approximation	This procedure is an approximation of and is more practical than true random sampling. For example, systematic random sampling requires random sampling in the first step, while the units in the second step are selected in some systematic fashion.	Every 5 th or 10 th employment establishment, household, or reintegrated trafficking victim is selected to generate an estimate that can be used without losing the ability to generalize.
Sampling with certainty	Particular units are removed from the sampling design to reduce the variation in the estimates. These units are selected "with certainty," while the "noncertainty" units are randomly selected.	Some geographic areas with a known high incidence of trafficking can be included in the estimation with certainty, while sampling procedures can be applied in other parts of a country or region.

Source: GAO analysis of expert panel proceedings.

^aThis procedure was used by ILO to obtain its global estimate of forced labor. For a detailed discussion, see Patrick Belser, Michaelle de Cock, and Ferhad Mehran, *ILO Minimum Estimate of Forced Labour in the World*, ILO (Geneva: April 2005).

Comments from the Department of State

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



United States Department of State

*Assistant Secretary for Resource Management
and Chief Financial Officer*

Washington, D.C. 20520

JUL 13 2007

Ms. Jacquelyn Williams-Bridgers
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Ms. Williams-Bridgers:

We appreciate the opportunity to review your draft report, "HUMAN TRAFFICKING: Monitoring and Evaluation of International Projects are Limited, but Experts Suggest Improvements," GAO Job Code 320444.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Carla Menares Bury, Multilateral Affairs Coordinator, Office to Monitor and Combat Trafficking in Persons, at (202) 312-9649.

Sincerely,

A handwritten signature in black ink, appearing to read "Bradford R. Higgins".

Bradford R. Higgins

cc: GAO – Jeremy Latimer
G/TIP – Mark Lagon
State/OIG – Mark Duda

Department of State Comments on GAO Draft Report

**HUMAN TRAFFICKING: Monitoring and Evaluation of International
Projects are Limited, but Experts Suggest Improvements**
(GAO-07-1034, GAO Code 320444)

Thank you for allowing the Department of State the opportunity to comment on the draft report “HUMAN TRAFFICKING: Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements.”

The report confirms several challenges inherent in foreign assistance efforts, including anti-human trafficking programs. Coordination is always important but challenging, considering the number and range of actors involved. Monitoring project performance is essential, but confronts the reality of limited staff resources. Rigorous project evaluation is invaluable but, often, too expensive to be cost effective for small projects. Based on an internal assessment in early 2006, the Department of State initiated steps to improve anti-human trafficking program management including protocols to strengthen anti-trafficking project design and monitoring.

We note that program monitoring is always necessary, and it is in place and improving. In this sense, the Report’s title suggesting that monitoring is “limited” is not apt.

The Department is pleased to report that three specific initiatives, currently underway, respond directly to the grant-related issues highlighted in the GAO Report:

- New grant awards include indicators and targets
- Guidelines for Embassy participation in monitoring grants that are awarded and managed in Washington will be issued with each grant
- Additional funds will be allocated to evaluation activities this year

The State Department’s international programming is an important component of the U.S. Government’s strategy to combat trafficking abroad. Department-funded programs represent a more limited range in terms of program size and duration than referenced in the GAO’s Report. The typical project is funded for \$250,000 over 12 to 18 months. This limited project scope reflects a strategic decision to use scarce dollars in this new and

See comment 1.

See comment 2.

See comment 2.

emerging field to support numerous discrete, targeted projects around the world. The Department's strategy has helped establish new partners in the fight against trafficking and build the capacity of local non-governmental organizations (NGOs) toward management of larger, longer-term projects.

It is important to recognize these strategic programming decisions as we move forward in improving efforts to evaluate the impact of anti-trafficking programs. Most State Department projects, including those funded by the Office to Monitor and Combat Trafficking in Persons (G/TIP) and the Bureau of Population, Refugees, and Migration (PRM), and sometimes regional bureaus, are quite different from programs funded by the Department of Labor (DOL) and the U.S. Agency for International Development (USAID), which are typically multi-year and multi-million dollar projects. Larger and longer-term projects are more suitable candidates for impact evaluation than shorter, targeted projects.

While we recognize that effective project design lays the foundation for assessment of project effectiveness, we make a distinction between project monitoring and program evaluation. Project monitoring involves the ongoing assessment of grant activities to ensure that the terms and conditions of the grant are being met, objectives accomplished, and federal funds are spent responsibly. Program evaluation involves the assessment of a project's short-term and long-term impact, which entails a systematic and comprehensive analysis of activities and outcomes. Impact evaluation studies are critical to identify the most effective programmatic practices for replication; however, it is always important to consider which programs are best suited for this type of study as many small targeted projects of limited duration are worthy of funding, and always require monitoring, but are not necessarily appropriate for evaluation.

The program and grant officers within the Department have monitored anti-trafficking grant projects within the limits of available resources to ensure that project goals and objectives are implemented; that Federal grant funds were expended consistent with the provisions of pertinent statutes, regulations, agency administrative requirements; and that Federal funds are used responsibly.

The Department strongly supports the value of applying rigorous evaluation methods. It appreciated the opportunity to have G/TIP participate in the experts' meeting hosted by the GAO on this subject. Relevant

Department offices and bureaus consistently strive to improve programmatic performance in order to strengthen the U.S. Government's ability to lead the charge against trafficking at home and abroad. The Department is pleased to provide the following comments on GAO's specific recommendations.

The Department generally agrees with the assertion that the anti-trafficking field is well-served by more information about the nature and severity of human trafficking; however, projects are not always designed with the purpose of having an immediate effect on either. Many projects funded by the State Department are designed to be of more limited size, scope, and duration with shorter or more proximate objectives that lay a foundation for future efforts that promote systemic change. Further, not all projects will contribute to the development of better data on the incidence of human trafficking. Examples include activities such as creating victim-friendly interview rooms at police stations; assisting governments to draft comprehensive anti-trafficking laws; or training a small cadre of law enforcement officers who can train others. These projects often serve as the foundation for projects that contribute more directly to long-term impact.

The Department is committed to investigating methods of assessing the effectiveness of short-term projects and the impact of longer-term projects on the nature and severity of trafficking in target areas. G/TIP, for example, plans to fund evaluation activities in the coming years in order to promote promising practices for future replication. With the limited funding available for research-related activities, G/TIP will give priority to assessing whether programs are suitable for an impact study and conducting impact assessments of selected programs, rather than developing a global estimate of the incidence of trafficking. We are seeking to evaluate our projects using methodologies and rigor appropriate to the size, scope, and duration of our projects.

PRM is also working to improve performance monitoring by supporting the development of a manual on performance indicators (PI) due to be completed by the International Organization for Migration (IOM) by the end of the year. This manual, intended as reference material, is proposed as a compilation of PIs covering the 3 Ps (protection, prevention and prosecution). IOM will incorporate these PIs in its work, and will disseminate this tool, making it available to other partners in the fight against trafficking. The completion of the PI manual will help IOM use the same performance indicators across Missions for comparable

program activities, such as international voluntary returns, or reintegration activities. When compiled, the reported information will be a valuable tool to help evaluate the effectiveness of specific program activities. However, given PRM's limited capacity to compile and compare country and regional data, PRM will approach IOM to discuss options for such analysis.

The Department's funding decisions are increasingly guided by the analysis compiled in the annual Trafficking in Persons Report. This analysis provides a roadmap to target priorities for foreign assistance programming.

The Department supports the idea that effective project design is critical to successful project implementation and program monitoring. It can also lay the foundation for evaluation, depending upon the characteristics of the project. At the same time, we would like to flag that this element often requires human and financial resources.

The Department has already initiated efforts to improve the design of anti-trafficking projects by more clearly describing the required program elements in recent requests for proposals. G/TIP's Fiscal Years (FY) 2006 and 2007 solicitations for proposals required applicants to clearly articulate goals and objectives, identify activities to support each goal and objective, and develop appropriate indicators of success, including targets. The information provided in this required proposal format will be the cornerstone for the design of unique project monitoring plans for FY 07. This information will also feed into consideration of whether the project should be subjected to an evaluation study, i.e., the evaluability assessment. G/TIP's efforts have been recognized as a model for other offices within the Department. For the past two years, PRM-funded IOM anti-trafficking projects also have included an overall framework of activities with goals, specific objectives, and specific performance indicators.

G/TIP has increased the number of Program Officers on staff (from two to five between 2005 and 2007) and given greater attention to the development of performance indicators and the conduct of site monitoring visits. In addition, G/TIP will issue guidance to the relevant U.S. embassy officers when each new FY 07 grant is awarded; the guidance will provide key project information and will recommend procedures for embassy participation in monitoring, given embassy staffing and workloads.

See comment 2.

The Department does not think a relatively short timeframe for a project is a design weakness. We think U.S. Government funds should be used to support a variety of approaches, including some targeted, short-term projects with clearly defined, limited activities especially in local areas lacking major international funding or organizational support. Such projects can be important components of a larger anti-trafficking strategy, including strengthening the capacity of local organizations. Therefore, not all projects will be suitable for an impact evaluation. G/TIP is currently working on a design for conducting evaluability assessments for selected projects that meet minimum criteria for an impact assessment.

See comment 3.

While baseline data is an important component of many projects, the Department disagrees with GAO's assertion that it is required for all interventions. We target countries with low rankings in the annual Trafficking in Persons Report for limited anti-trafficking funding; countries that, typically, have the political will to address the problem, but limited economic resources to do so. Projects selected for funding address specific weaknesses or deficiencies identified in the annual Trafficking in Persons Report with the goal of assisting the host country in addressing this issue and improving their tier ranking. We will seek to obtain baseline data to help assess program effectiveness where appropriate, and when such data is available.

In summary, monitoring and evaluation – which are different – are extremely important. Anti-trafficking program monitoring is essential, and has been improved tangibly in the last two years. Evaluation is very beneficial whenever feasible and when a project is not so limited or of short duration that it adds little value.

GAO reinforces what the Department already knows: monitoring and evaluation of international programs are essential if foreign assistance is to be effective. We will implement the recommendations in the report, most of which are entirely consistent with the Department's current activities and direction, in ways that are relevant and appropriate to the mandates of the State Department offices and bureaus engaged in path-breaking anti-human trafficking efforts.

The following are GAO's comments on the Department of State letter dated July 13, 2007.

GAO Comments

1. State said that the report's title is not apt because program monitoring is in place and improving. We believe that monitoring is limited for the following reasons: for the 23 projects we reviewed, the majority did not have a logic model that clearly explains how activities are linked to project goals; the majority of these projects also did not specify targets that establish benchmarks for measuring performance; of the 10 projects that did specify targets, only 5 explained how targets were set; and, finally, State lacked written guidance for field-level oversight.
2. State noted that many of its projects are designed to be of more limited size, scope, and duration, and that such projects are not necessarily suitable for evaluation. They also added that larger and longer-term projects are more suitable candidates for impact evaluation than shorter projects. Finally, State commented that a relatively short time frame for projects is not a design weakness. In the report, we state that the impact of a shorter-term, smaller-scale intervention may be difficult to attribute and quantify.
3. State noted that baseline data are not required for all interventions. We disagree. In the report, we state that baseline and target values of indicators are needed to assess project performance. For example, baselines for a victim assistance program could include the number of victims served or assisted, or the number of vocational training sessions held. Moreover, project-level estimates are needed for baselines by which to evaluate how effectively interventions are reducing trafficking. For this type of baseline, panelists suggested methods for baseline estimation, such as gathering data in trafficking hot spots, that would allow for more rigorous impact evaluations.

Comments from the Department of Labor

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

U.S. Department of Labor

Deputy Under Secretary for
International Affairs
Washington, D.C. 20210



JUL 13 2007

Mr. Thomas Melito
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Melito:

Thank you for giving the U.S. Department of Labor (DOL) the opportunity to review and comment on the draft report entitled *Human Trafficking: Monitoring and Evaluation of International Projects are Limited, but Experts Suggest Improvements* (GAO-07-1034). The report provides a good overall assessment of international cooperation regarding anti-trafficking efforts and the need to enhance collaboration among key agencies and governments, and highlights important areas for improving monitoring and evaluation of U.S. Government-funded anti-trafficking programs.

While we understand that the report was limited to anti-trafficking projects and fieldwork conducted in Indonesia, Thailand, and Mexico, and was meant to assess U.S. Government efforts as a whole, there are a number of areas that do not fully reflect efforts particular federal agencies are carrying out in the monitoring and evaluation of anti-trafficking projects. For example, the report indicates that (1) federal agencies funding anti-trafficking projects lack key elements in order to appropriately monitor project implementation and effectiveness, and (2) not much is known about project impact due to challenges in conducting evaluations. DOL would like to make clear that it uses several mechanisms, including process evaluations, in its monitoring and oversight of international technical assistance projects, including anti-trafficking projects, to ensure that U.S. Government funds lead to planned outputs and results.

The attachment includes DOL comments divided into two sections. The first section provides general comments regarding DOL's monitoring and evaluation of anti-trafficking projects. The second section provides specific comments noting where clarification is needed or where further information could be provided to better support the report's conclusions.

Again, thank you for the opportunity to comment on this report. If you have any questions, please don't hesitate to call me at (202) 693-4770.

Sincerely,

A handwritten signature in black ink that reads "Charlotte M. Ponticelli".

Charlotte Ponticelli
Deputy Undersecretary for International Affairs

Attachment

**U.S. Department of Labor's
Comments on the draft GAO report:
Human Trafficking: Monitoring and Evaluation of International
Projects are Limited, but Experts Suggest Improvements
(GAO-07-1034)**

July 13, 2007

General Comments

1. Throughout the report, specifically pages 19-26, GAO notes that U.S. Government anti-trafficking projects do not have sufficient monitoring elements to measure performance nor do they conduct evaluations to determine effectiveness or impact. However, federal government agencies are carrying out these activities, or are making efforts to monitor and evaluate anti-trafficking projects. In many cases, GAO seldom mentions specific examples of areas where these activities are occurring. In addition to the supporting documentation DOL already provided to the GAO, the following contains further explanation on its monitoring and evaluation of anti-trafficking projects.

DOL's international technical assistance projects to reduce and prevent exploitive child labor, including anti-trafficking, undergo a common project cycle that includes (1) defining and analyzing the problem; (2) designing the project with a logical framework that includes measurable objectives and indicators of achievement; (3) monitoring the project for performance and results against a performance monitoring plan (PMP); and (4) evaluating the project's effects, outcomes, and lessons learned. In addition, all of DOL's international technical assistance projects, including anti-trafficking projects, have performance indicators to measure the outcome and progress of all projects, and undergo mid-term and final process evaluations to determine if intended services were delivered to targeted beneficiaries.

Moreover, DOL's anti-trafficking projects are designed to monitor the contribution of each project to DOL's Strategic Goal 2 – A Competitive Workforce: *Meet the competitive labor demands of the worldwide economy by enhancing the effectiveness and efficiency of the workforce development and regulatory systems that assist workers and employers in meeting the challenges of global competition.* Within this strategic goal are outcome goals, Outcome Goal 2K – Contribute to the Elimination of Child Labor Internationally. For example, DOL's Bureau of International Labor Affairs' (ILAB) GPRA indicators include: (1) *"the number of children prevented or withdrawn from exploitive child labor provided education and/or training opportunities as a result of DOL-funded child labor elimination projects,"* and (2) *"the number of countries with increased capacity to address child labor as a result of DOL-funded projects."*

- a. Monitoring of DOL's International Anti-Trafficking Projects. To ensure that inputs (i.e., resources that support the project) lead to planned outcomes (results), DOL engages in monitoring and providing oversight to project implementation and progress. The principal monitoring and oversight vehicles to ensure all project activities are covered and results are achieved in a timely manner and in compliance with U.S. regulations are

See comment 1.

- b. the use of project workplans and PMPs, technical and financial progress reports, site visits, project evaluations, and audits and attestation engagements.
- c. Monitoring of ILAB Projects through Audits and Attestation Engagements. ILAB's Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) utilizes audits and attestation engagements as key monitoring tools of their projects.

ILO Audits. OCFT has engaged the ILO's External Auditor, currently the National Audit Organization of the United Kingdom, to conduct audits of a sample of the projects funded under the cooperative agreement with the ILO's International Program for the Elimination of Child Labor (IPEC). The IPEC projects to be audited are selected by OCFT managers using a risk ranking assessment, and the audits are conducted in accordance with terms of reference negotiated by OCFT, the ILO and the External Auditor. The objectives of the audits conducted by the ILO's External Auditor are similar to the objectives of the attestation engagements of the Education Initiative projects, specifically to:

- Form an opinion on whether the financial transactions reflected in the Financial Status Report (SF269) are presented fairly and in all material respects in conformity with generally accepted accounting principles as applied by the United Nations System of Accounting Standards;
- Determine whether the project is complying with all of the terms of the relevant cooperative agreement; and,
- Assess the reliability of the performance data reported on the project's most recent technical progress reports, based on a risk assessment to provide a sufficient assurance, through one or more visits to project field sites.

Under current agreements, the External Auditor will conduct approximately 20 audits of IPEC projects between August 2006 and June 2008.

Attestation Engagements of OCFT Education Initiative Grantees. ILAB/OCFT has entered into a Blanket Purchase Agreement with a certified public accounting firm to conduct independent attestation engagements of OCFT Education Initiative grantees. The purpose of these attestation engagements is to:

- determine whether the grantees are complying with the terms of their OCFT cooperative agreements and with the Department of Labor's regulations for grants (29 CFR Part 95);
- ensure that financial reports are accurate and reliable; and
- assess the accuracy and reliability of the performance data from the grantees' progress reports that support OCFT's performance goals and measures in the Department's performance budget and Annual Report on Performance and Accountability.

In an attestation engagement, an auditor may assess a broad range of financial or non-financial subjects and report on the results. The results of each attestation engagement conducted by OCFT's contract auditors are summarized in an examination report, which requires the auditor to express an opinion on the audit objectives and related assertions by grantee officials. As prescribed by professional audit standards, grantee officials sign a management representation letter addressed to the auditor that provides assertions about the grantee's compliance with the regulations and cooperative agreement provisions and the reliability of their financial and performance data, and the auditor's opinion expresses conclusions about the fairness of management's assertions. The report also includes the details of the auditors' findings, recommendations for improvement, and funds that should be recovered from the grantee, if any.

The Blanket Purchase Agreement requires that the auditors conduct their work in accordance with the standards on attestation engagements published by the American Institute of Certified Public Accountants (AICPA) and included in the U.S. General Accounting Office's *Government Auditing Standards*, 2003 Revision (the *Yellow Book*). OCFT staff responsible for monitoring the audits is required to be familiar with the provisions of the Blanket Purchase Agreement and with Chapters 2, 3 and 6 of the *Yellow Book*.

- d. Evaluation of DOL's International Anti-Trafficking Projects. All DOL-funded international technical assistance projects, including anti-trafficking projects, must undergo independent mid-term and final evaluations. Mid-term evaluations take place as close as possible to the mid-point of the project. Their intended purpose is to evaluate the project to date and to provide recommendations regarding possible changes that may improve project performance during its second half of implementation. Final evaluations take place close to the end of the project and are oriented more towards lessons learned and sustainability issues. In some cases, expanded final evaluations are conducted among projects that often include a limited "repeat baseline" or follow-up study. The aim is to try to look at the details of a sample of beneficiaries to document changes that have occurred and learn from these experiences.

2. The GAO report has a strong emphasis on conducting impact evaluations with randomized trials, and seems to understate the value of carrying out qualitative, process/ implementation evaluations. In the international development community, carrying out impact evaluations is an emerging field. While DOL agrees with the need to carry out more systematic impact evaluations in order to determine the effectiveness of key interventions, we have also learned through dialogue with evaluation experts and oversight of technical assistance projects that carrying out process evaluations is a prerequisite and complements the formulation of successful impact assessments. In general, DOL suggests clarifying statements where evaluations are mentioned generally to differentiate between process and impact evaluations. Otherwise, it seems that evaluations are not being conducted at all.

In addition, DOL recognizes that impact evaluations, particularly randomized controls, are key to measuring the effectiveness of particular interventions but not appropriate in all

projects. It would be extremely helpful if GAO could outline when it is appropriate to do randomized trials. In cases, where randomized trials are not appropriate, suggesting other means of evaluation would be beneficial.

Specific Comments

See comment 4.

1. In the Executive Summary, pages 4 and 19: "U.S.-government funded anti-trafficking projects often lack some important elements that allow projects to be monitored, and little is known about project impact due to difficulties in conducting evaluations."
 - DOL suggests changing "often" to "sometimes" since all DOL international technical assistance project, including anti-trafficking projects, are designed to include project workplans and project monitoring plans.
 - DOL agrees that little is known about the impact of key project interventions. However, the statement seems to suggest that evaluations of any sort are not taking place and that project outcomes and results are not being assessed.
2. Page 4: "Project documents we reviewed generally include monitoring elements, such as an overarching goal and related activities, but they often lack other monitoring elements such as targets for measuring performance."
 - DOL suggests changing "often" to "sometimes" since all our project documents contain targets for measuring performance.
3. Page 8, Table 1: The figures listed in the current table are outdated. The current total figure DOL has for FY2001- 2006 is \$186,095,141 (or \$186,395,141 if you include MACRO TVPRA research); FY 2001 is \$22,264,536, FY 2005 is \$35,900,000, and FY 2006 is \$28,048,000 (not including MACRO TVPRA research). All of the other years match up with these figures.

Specifically the figures in the report for FY 2001 and 2005 included projects that were misclassified. In addition, the FY06 has the \$300,000 for MACRO TVPRA research included.
4. Page 20: "In contrast, a Labor-funded project in Mexico clearly links project goals and activities."
 - DOL suggests including "Labor-funded projects in Indonesia, Mexico, and Thailand" since all DOL-funded technical assistance projects, including anti-trafficking projects, are required to link goals and activities.
5. Page 21: "..., only 10 specify targets by which performance is measured."
 - All DOL projects are required to specify number of beneficiaries targeted prior to project funding and implementation.

6. Pages 21-22: DOL suggests including information on project monitoring efforts. DOL's Operations Manual and Management Procedures and Guidelines were submitted as part of supporting documentation provided to GAO.
7. Page 4 and 23: There are several references to the "questionable estimates of the number of trafficking victims," and the "need for baselines by which to evaluate how effectively interventions are reducing trafficking."
 - DOL suggests providing more clarification to statements regarding baseline estimates and the impact of interventions. It is unclear whether the baseline estimates are referring to global estimates of trafficking victims or estimates of trafficking victims at project-level sites. In determining impact of interventions, the project-level is more appropriate than national, regional, or global estimates.
8. Page 25: "...do not trace victims over time"
 - DOL projects include a monitoring component that requires projects to monitor the work and education status of project participants during the life of the project. Each project must ensure the effective prevention and withdrawal of targeted individuals through education and training and assess the retention of participants in project activities, and the completion of those activities.
9. Page 26: "For example, an evaluation of Labor-funded project..."
 - DOL would like to clarify that while the project was not designed to evaluate impact, it was designed to monitor performance and outcomes. For example, as a result of the DOL-funded anti-trafficking project in Thailand, 202 child trafficking victims or at-risk children were placed in education and/or vocational training, and 295 children victims or at-risk children received legal services. A major objective of the project was to secure citizenship for tribal minority children and their families, who were vulnerable to trafficking, so they could be afforded education and employment rights. The project prepared documentation for citizenship applications for 5,059 children, submitted a total of 11,194 citizenship applications for children and their parents, and secured approval of 5,131 applications by the end of the project.
10. Page 32, DOL would like to clarify that "rigorous evaluation methodologies" may also include process evaluations.

The following are GAO's comments on the Department of Labor letter dated July 13, 2007.

GAO Comments

1. Labor noted that federal agencies are carrying out monitoring and evaluation activities or are making efforts to improve monitoring and evaluation of antitrafficking activities. Labor also provided details of its monitoring policies, procedures, and activities. We recognize that Labor has monitoring procedures and activities in place, and we revised text in several locations to provide further clarification on Labor's activities. We clarified that all four Labor projects in Indonesia, Mexico, and Thailand clearly link goals and activities, specify targets, and explain how targets were set. We added language stating that Labor engaged ILO's external auditor to conduct audits of a sample of ILO's projects to eliminate child labor and contracted with a certified public accounting firm to conduct independent attestation engagements of its Education Initiative projects. We believe the overall monitoring of antitrafficking projects is limited because the projects funded by the other five agencies did not have the elements of monitoring we found in Labor's projects.
2. Labor stated that it requires midterm and final evaluations for its technical assistance projects, and that, in some cases, it engages in longer-term follow-up studies. We revised the text to further clarify and recognize Labor's evaluation requirements and activities. In addition, we added text specifying that Labor funds follow-up studies to document changes that have occurred to a sample of beneficiaries over time.
3. Labor agreed with the need to carry out more systematic impact evaluations, but also emphasized that process evaluations are an important prerequisite of impact evaluations. Labor further commented that randomized trials are not appropriate for all projects, and requested that we specify where agencies should conduct randomized trials and where other methods would be more appropriate. We agree that process evaluations are important and revised the text to further differentiate process evaluations from impact evaluations. We believe each agency should determine whether randomized trials are appropriate for the specific project they are evaluating.
4. We made changes to the draft of this report on the basis of Labor's specific technical comments, where appropriate.

Comments from the United States Agency for International Development



USAID
FROM THE AMERICAN PEOPLE

JUL 16 2007

Mr. Thomas Melito, Director
International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Melito:

I am pleased to provide the U.S. Agency for International Development's (USAID) formal response on the draft GAO report entitled "Human Trafficking: Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements" (July 2007) (07-1034). USAID appreciates the thoughtfulness of this GAO report. The challenges of coordination, monitoring and evaluation are issues with which we are concerned. As the report notes, considerable efforts have been made to coordinate within the U.S. government (USG) and with other organizations; USAID will continue to work within the interagency process in Washington and in the field.

We agree that monitoring and evaluation of our anti-trafficking efforts are very important and that they rely on availability of both human and financial resources. The issues inherent in evaluation of anti-trafficking activities are particularly challenging because there is no baseline against which to measure progress. Even on a local level, obtaining good estimates of the number of individuals who have been trafficked is extremely difficult because of the shifting underground nature of the phenomenon, the gray areas within it, and the reluctance of most victims to identify themselves as trafficking victims. Trafficking-in-persons data accurate enough to use as the baseline in a quantitative impact evaluation would be extremely difficult, if not impossible, to collect.

Evaluation standards must be adapted to fit the context of anti-trafficking activities. For example, the use of control groups or randomized trials might be suitable for awareness raising activities but would not be suitable in projects that

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- 2 -

focus on victim services. Trafficking victims suffer from psycho-social problems, are subject to threats of violent reprisals from traffickers, and face stigma and shame in their families and communities. For these and other reasons, they often are hesitant to identify themselves as victims of trafficking after their rescue or escape. The well-being of victims must be of primary concern in designing control group evaluations as it is in designing anti-trafficking interventions.

USAID is very decentralized, is operational in all countries in which it supports activities, and tends to have multi-year projects and field staff who are trained in project design. Not all USG agencies operate the same way and should be treated separately, building on the strengths and addressing the weaknesses of each.

USAID has capacity and a track record in a number of areas which are relevant to evaluation and monitoring. We developed the logical framework more than two decades ago and have run many training courses in project design. The Agency has supported training in monitoring and evaluation and last year sponsored training for representatives of NGOs addressing human trafficking in India and Bangladesh to strengthen their technical capabilities in evaluation. USAID can offer its training and experience in monitoring and evaluation and project design to other parts of the USG working to combat trafficking in persons.

USAID developed and supported a mapping project on victims of trafficking, vulnerable populations and anti-trafficking efforts for the Mekong and the Philippines and Indonesia in 2004. We could provide the methodology for mapping human trafficking routes, developing certain baseline data and detailing responses to trafficking in persons based on the mapping study done in 2004.

Thank you for the opportunity to respond to the GAO draft report and for the courtesies extended by your staff in the conduct of this review.

Sincerely,



Mosina H. Jordan
Counselor to the Agency

Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Assistant Secretary
for Legislation

Washington, D.C. 20201

JUL 20 2007

Thomas Melito, Director
International Affairs and Trade
U.S. Government Accountability Office
Washington, DC 20548

Dear Mr. Melito:

The Department has reviewed GAO Draft Report entitled: Human Trafficking: Monitoring and Evaluation of International Projects are Limited, but Experts Suggest Improvements" (GAO 07-1034),

Although we do not have any comments, we find this report to be a sound document that substantively covers the wide range of programs and services available to combat human trafficking.

The Department appreciates the opportunity to review this draft before its publication.

Sincerely,
Rebecca Hemmard
for Vincent J. Ventimiglia
Assistant Secretary for Legislation

GAO Contact and Staff Acknowledgments

GAO Contact

Thomas Melito (202) 512-9601 or melitot@gao.gov

Staff Acknowledgments

Cheryl Goodman, Assistant Director; Jeremy Latimer; Christina Werth; Todd M. Anderson; Gergana Danailova-Trainor; Terry Richardson; and Debbie Chung made key contributions to this report. In addition, Elizabeth Curda, Bruce Kutnick, Mary Moutsos, Barbara Stolz, and Susanna Kuebler provided technical or legal assistance.

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