NWF Health Network
Policy & Procedure

Series:	Special Populations	
Policy Name:	Human Trafficking	
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Regulation:	CFOP 170-14; F.S. 409-1754; F.S. 409-1678; 65C-43, F.A.C	

Policy

This policy describes the special requirements and actions relating to the commercial sexual exploitation of a child and labor trafficking of children. The policy establishes the roles and responsibilities of staff that are certified to work cases of human trafficking of children.

General Information

The recruitment, harboring, transportation, provision or obtaining of a child for labor or services through the use of force, fraud, or coercion. Under federal law, sex trafficking (such as prostitution, pornography, exotic dancing, etc.) does not require there be force, fraud, or coercion if the victim is under 18.

Training Requirements, NWF Health Network (NWFHN)/Case Management Organizations (CMOs) Responsibilities, Placement Considerations, Assessments, and Services for Commercial Sexual Exploitation or Human Trafficking Victims

A. Training Requirements.

All staff, to include supervisors, who have victims of human trafficking on their caseload, must have completed the specialized Human Trafficking training before accepting a case.

1. All staff must receive a minimum of six (6) hours of specialized training in human trafficking approved by the Department prior to accepting cases with trafficked children or young adults. The specialized training in trafficking shall consist of:
    a. Three (3) hours pertaining to trafficking of children (Human Trafficking 101);
    b. One (1) hour pertaining to the HB 7141, Safe Harbor Act and other Florida legislation on identifying and serving trafficked minors; and
    c. Two (2) hours of additional live training on specialized topics related to sexual exploitation of children, local procedures and policies, trauma, motivational interviewing, case studies, and survival panel.
    d. Prior to administering the Human Trafficking Screening Tool, any professional will also receive the specialized training to complete the tool.
2. Case Management Supervisors and Case Managers must receive a minimum of one (1) hour of ongoing training on sexual exploitation of children per quarter (every three (3) months), each year to maintain the specialized human trafficking training requirements.
    a. Training can be accessed and obtained through:

i. The My FL Learn : https://myflfamilies.csod.com; and/or

ii. Webinars or other training opportunities sent out by the Human Trafficking Unit at DCF

iii. Training hours cannot be combined into one training experience.

3. If a Case Manager Supervisor or Case Manager misses a quarterly training, they will have the following quarter to make it up and must complete two separate qualified trainings by the end of the second quarter to be able to maintain an active specialized human trafficking designation status. If two quarters pass without completing a minimum of two, one-hour courses, their specialized designation is suspended. While suspended they may not have any assigned human trafficking victims on their caseload or receive human trafficking investigations. Their suspension can only be reactivated when they complete Human Trafficking 101.

4. Completion of the training shall be tracked and recorded by subcontracted agencies. Case Management Supervisors are responsible for verifying completion of the training prior to acceptance of cases.

B. NWFHN Responsibilities and Initial Assessment Overview.

1. NWFHN and contracted service providers are required to design and deliver services that meet the unique needs of suspected and verified victims of human trafficking who have involvement with protective services, as well as, community children who are placed in safe houses or safe foster homes.

a. Not all children referred to Case Management from DCF are identified as victims of Human Trafficking, Labor Trafficking, or Commercial Sexual Exploitation of a Child (CSEC). Therefore, it is the responsibility of Case Managers and Case Manager Supervisors to ensure appropriate assessments occur, starting with the Family Functioning Assessment- Ongoing (FFA-O) and continue as cases progress.

b. NWFHN Human Trafficking designee shall ensure that all sexually exploited children residing in safe houses, safe foster homes, served in residential treatment centers or hospitals pursuant to s. 409.1678(3), F.S., have a Case Manager and a case plan which is completed on the Services Plan for Sexually Exploited Children and Young Adults form (CF-FSP 5405), regardless if the child is a dependent child as outlined in s. 409.1678(4)(b), F.S., or a community child.

i. The Services Plan for Sexually Exploited Children and Young Adults shall be developed during a Multidisciplinary Team Staffing.

ii. Multidisciplinary Teams include, but are not limited to, the Case Manager; Case Management Supervisor; NWFHN Well-Being Specialist or Human Trafficking Designee; the child, if appropriate; the child's family or legal guardian; the child's Guardian Ad Litem; Department of Juvenile Justice staff; school district staff; local health and human services providers; victim advocates; and any other person who may can assist the child.

iii. If a child is determined to be a verified victim of Human Trafficking, a result of the Multidisciplinary staffing will be for the NWFHN Human Trafficking Designee and the team to determine most appropriate service provider. Victims of Human Trafficking who have been determined to be safe by the child protective investigator

or have no safety determination (other) can be referred to Family Support Services in lieu of case management.

iv. Case Managers will ensure that caregiver(s) are provided detailed and complete information regarding any child victim of human trafficking (labor trafficking or CSEC) placed with them, so they are equipped with an understanding of the circumstances of the maltreatment, with the intention of providing the caregiver(s) sufficient knowledge to hopefully avoid a reoccurrence of the child's victimization or to prevent disruption in placement.

C. Placement Considerations and Ongoing Assessment.

1. The Case Manager will complete a Child Placement Agreement, at the time of initial placement and each subsequent placement change, when there are allegations, or as soon as it is known that a child exhibits behaviors or has circumstances that include any of the following:
   a. Juvenile sexual abuse behaviors or problematic sexual behavior;
   b. Behavior(s) that are a significant threat to other children; or,
   c. Identification as a victim of sexual abuse or human trafficking/commercial sexual exploitation of a child (CSEC).
   d. *Ongoing planning and decision-making for these cases should utilize a Multidisciplinary Team approach.*
2. Placement policy and procedures shall comply with Chapter 65C-43, F.A.C., and require that:
   a. All family time visitations shall occur off-site, at a location other than the "Safe House" placement.
   b. All persons the child is allowed to visit must be pre-approved by the Case Manager;
3. Once a child who is part of an open child abuse investigation, is confirmed to be a victim of commercial sexual exploitation, and is determined to be in need of case management services, a Case Transfer Staffing will be requested by Protective Investigations. Within 48 hours of the transfer staffing, the Protective Investigator will accompany the Case Manager or Family Support Services Staff for the initial home visit. Case Managers shall:
   a. Assess the child for placement in a "Safe House" environment in a manner that meets all requirements established by s. 39.524(1), 409.1754, and 409.1678, F.S. The Level of Human Trafficking Placement Tool has been identified as a Safe House Assessment tool and may be utilized in determining the placement of the child. In addition, all children that are victims of sex trafficking and placed in substitute care must have a Child Placement Agreement.
   b. Ensure all "Safe House" assessments must be updated, at a minimum, every 180 days on an ongoing basis for as long as the child is a confirmed victim in an active non-judicial or judicial case.
   c. Ensure the court is kept aware of the status of the child. Per s. 39.524(2), F.S., the results of any "Safe House" assessment, Human Trafficking Screening Tool (HTST), Multidisciplinary Team Staffing, and the actions taken as a result of the assessment must be included in the Family Functioning Assessment Ongoing (FFAO) or next Judicial Review Social Study Report (JRSSR) for the child as completed and updated by the Case Manager at each subsequent judicial review for as long as the child is an active participant in an open

case where the child is coded as being a confirmed victim of commercial sexual exploitation within FSFN. At each subsequent Judicial Review, the court must also be advised in writing of the status of the child's placement, with special reference regarding the stability of the placement, any specialized services, and the permanency planning efforts for the child. Case managers and case manager supervisors must request that an Attorney ad Litem be appointed for every verified dependent child victim of human trafficking.

d. Document the reason for not placing a child into a "Safe House" environment within SACWIS in all instances when a child has been adjudicated dependent and the minimum placement requirements for possible consideration for placement into a "Safe House" environment have been met.

e. Ensure special care be given, when considering placement of a child who is suspected to be a victim of human trafficking, when assessing appropriateness of a parent, relative, caregiver or legal guardian, until there is a clear determination that the person being considered for placement of the child is not a trafficker or allied with the trafficker.

f. Changes in unlicensed placements should not occur if there is an open criminal case without conferring with law enforcement to ensure the proposed placement is not part of the Human Trafficking.

g. Case managers and case manager supervisors shall ensure the legal rights of children who are suspected or verified victims of commercial sexual exploitation are protected while still allowing for them to be questioned as part of any ongoing criminal investigation against a possible trafficker.

h. NWFHN Human Trafficking designee shall attend all human trafficking Multidisciplinary Team Staffings. Victims of Human Trafficking who have been determined to be safe by the child protective investigator or have no safety determination (other) can be referred to Family Support Services in lieu of case management.

i. Utilize the Human Trafficking Screening Tool

    i. Case Management Supervisors **shall review the cases of all children** who are currently placed in the dependency system.

    ii. The screenings will include children who have already been identified as being currently involved in the commercial sex trade, for possible involvement in the commercial sex trade by utilizing the indicator list outlined in the Online Human Trafficking Screening Tool (HTST)

    iii. As defined in the list of indicators in the Human Trafficking Screening Tool (HTST), children or young adults with the following indicators must be assessed using the HTST:

        a. Youth's acknowledgement of being trafficked.

        b. Report of human trafficking by parent/guardian, law enforcement, medical or service provider, teacher, child protective services, and/or juvenile probation officer.

        c. History of running away or getting kicked out 4+ times.(Definition of running away or getting kicked out of home: Include times the youth did not voluntarily return within 24 hours, and include incidents not reported by or to law

enforcement.)

d. Child is 12 or older and has a history of allegations of sexual abuse (with or without findings) or a disclosure of sexual abuse by the child.

e. Current incident or history of inappropriate sexual behaviors (not limited to prostitution).

f. Child known to associate with confirmed or suspected CSEC youth.

g. Child is recovered from runaway episode in a hotel or known area of prostitution.

h. Child has no knowledge about the community he/she is located in.

i. Child is not allowed or unable to speak for him/herself and may be extremely fearful.

j. Child has no personal items or possessions (including identity documents if foreign born - labor trafficking.)

k. Child appears to have material items that he or she cannot afford (e.g. cell phones, expensive clothing, tablets, etc.)

l. Child shows signs of being groomed (i.e. hair done, nails done, new clothing, etc. that child cannot afford or justify how paid for.)

m. Suspicious tattoos or other signs of branding (e.g. tattoos of the trafficker's names, dollar signs, diamonds, stars, etc. May also have certain designs/logos on nails, jewelry, etc.)

n. Child associates and/or has relationships with age-inappropriate friends, boyfriends, and/or girlfriends.

o. Child has inappropriate, sexually suggestive activity on social media websites and/or chat apps.

iv. The HTST shall be initiated within 24 hours of identifying one or more of the conditions noted above in subsection (ii)(a)-(o). If the child or young adult's whereabouts are unknown, the HTST shall be initiated within 24 hours of the debriefing of a recovered child or young adult if the debriefing results in indicators of human trafficking as noted in above in subsection(ii)(a)-(o);

v. Any professional administering the HTST must meet the training requirements noted above in this section, (A)(1);

vi. If the child is suspected or confirmed to be a victim of human trafficking, a report should be made to the Abuse Hotline;

vii. Once the HTST has been completed, the Case Manager shall:

a. Provide a copy, either in person, via inter-office mail, or by scanning and emailing to the NWFHN Human Trafficking designee/CSEC Point-of-Contact, and

b. Scan and upload the completed form into the FSFN File Cabinet, and label it as, "Other- HTST".

viii. When appropriate, the HTST can be shared with other agencies working with the child, for the purpose of providing applicable treatment, in order to prevent the need for the tool to be duplicated by multiple service providers.

a. The only time a new HTST should be completed, if one was completed previously, is when new information/allegations are received, and an effort should be made by the assessor to avoid duplicative inquiries, as the prior assessment information can be carried over into the present tool. The HTST does not have to be completed on previous verified victims within a 6-month period. However, the HTST must be completed on previous verified victims if longer than 6 months since being confirmed victims of trafficking.

j. Once an HTST has been completed by a NWFHN subcontracted agency staff, the NWFHN HT designated staff shall complete part one of the Screening, Placement and Services for Sexually Exploited Children and Young Adults Reporting Checklist (CF-FSP 5413) to be utilized for the monthly report to DCF.

k. The NWFHN Human Trafficking designee will collect information on an ongoing basis and track suspected or verified victims of Human Trafficking to provide to the DCF Human Trafficking Coordinator by required due date on CF-FSP 5413. This information will include:

i. Number of assessments completed and the outcome of the assessments;

ii. The specialized services provided through NWFHN;

iii. Placement of verified victims of commercial sexual exploitation, specifically if a safe foster home or safe group home was selected for placement, and if not, why not.

D. Children's Mental Health Wraparound Funding (5-20-6)

1. Children's Mental Health Wraparound Funding is available for the treatment and/or services of a child who has been the victim or suspected victim of CSEC.

2. Eligible children are those who meet all of the following criteria:

a. Are birth to eighteen (18) years old;

b. They are in out-of-home care or are at risk of placement in out-of-home care;

c. They have a mental, emotional, or behavioral disorder diagnosed within the previous twelve (12) months sufficient to meet diagnostic criterion; and

d. Have a functional impairment which interferes with, or limits the child's role or functioning in family, school, or community or would have met the functional impairment criteria during the reference year had they not had services or support provided; and

e. Services must be identified in the mental health treatment plan or the service plan for the child or the case plan for the child.

3. The Department must be able to track and monitor costs associated for all CSEC identified children; therefore, a new Other Cost Accumulator (OCA), CSEC0, titled CBC- Child Victims of Sexual Exploitation-MH, has been created, along with a new FSFN Reporting Category, CSEC-Children's Mental Health Services-Case Plan, so that the services can be documented in FSFN.

4. Use of wraparound funding is not for room and board placement costs of a CSEC identified child, but for non-Medicaid reimbursable support services needed, which have been identified in the child's case plan or mental health treatment plan.
5. Tools to be utilized in the assessment of placement decision for the sexually exploited child include:
    a. Human Trafficking Screening Tool and
    b. Level of Human Trafficking Placement Tool.
6. Determination of eligibility
    a. The Child Protective Investigator or Case Manager shall notify the NWFHN Human Trafficking designee of all children who have been identified as victims of HT/CSEC;
    b. The NWFHN Human Trafficking designee will compile the required report(s) for DCF, which shall also be utilized to help with determination;
    c. The Rev Max unit will determine eligibility based on the disseminated report to DCF and coordinate with LCI/NWFHN Finance for allocation of funding.

E. Case Closure

1. Any non-judicial case and community service referrals receiving services through NWFHN or subcontracted provider in which is no longer participating or making progress in efforts to reduce risk, will require a "close the loop" staffing.
    a. Additional service needs as well as ongoing risk will be discussed and the outcome documented in FSFN.
    b. At a minimum, those individuals included in the "close the loop" staffing must be the referring Child Protective Investigator, the referring Child Protective Investigator Supervisor, and service providers working with the family and the individual responsible for case coordination.
2. All non-judicial cases must receive services for a minimum six (6) months and the service plan must be complete.
3. Any judicial case shall follow court requirements on termination (65C-30.022 F.A.C.)