



DEPARTMENT OF
HUMAN SERVICES

Minnesota's Best Practice Response to Trafficking and Exploitation of Children and Youth

**A guide for county and tribal
child welfare agencies**

February 2020



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I. Introduction, purpose and scope of the best practice guide on trafficking and exploitation of children and youth

Introduction

There are two forms of human trafficking in the U.S., sex and labor trafficking. Both types of human trafficking impact children, youth and families in Minnesota. Since May 29, 2017, federal and state law requires child protection to investigate all reports of known or suspected sex trafficking.

This practice guide is for the child welfare system response to trafficking and exploitation of all children ages 17 and younger, and also includes discussion of response for youth ages 18 through 24 transitioning into adulthood. The best practice guide may use one or both terms, depending on whether an individual is a minor or an older youth. This guidance is inclusive of children of all genders, nationalities, races, cultural backgrounds, political status, tribal affiliation, ability or disability, created for implementation in both rural and urban areas.

This practice guide is designed to complement and coincide with Minnesota's Safe Harbor response to exploited and trafficked youth. Safe Harbor is the framework for the statewide response to sexually exploited and trafficked youth, including those at risk of exploitation or trafficking. The Minnesota Department of Health, in partnership with the Minnesota Department of Human Services (department), developed the Safe Harbor system. Safe Harbor has developed specialized services for sexually exploited children and youth, including shelter and housing, regional navigators and specialized services. This system is referred to as the No Wrong Door model, in which sexually exploited, sex trafficked or at-risk youth can access help through any door regardless of how contact is made.

There are key distinctions between state and federal laws defining sex trafficking, labor trafficking and sexual exploitation. The following **definitions of trafficking and exploitation** are used throughout the practice guide, and explained in more detail in Section III: Intake and Screening.

Commercial sex act¹ means the exchange of something of value for sexual contact or penetration.

Sexual exploitation of youth includes all commercial sex acts and non-commercial sexual abuse [Minn Stat. 260C.007, subd. 31]

Sex trafficking is defined in Minnesota as the act of a third party, not the purchaser or the victim, facilitating or profiting from a commercial sex act performed by another person [Minn. Stat. 609.321-609.322]. Under federal law, sex trafficking is defined differently as a severe form of trafficking in persons. Federal law does not require that a third party be the trafficker.

¹ This term will be utilized throughout the practice guide instead of the term "prostitution" due to the connotation of the word and stigma many survivors experience when "prostitution" or "prostitute" are used. The meaning of commercial sex act conforms to the meaning of prostitution under Minn. Stat. 609.321.

Severe form of trafficking in persons is defined under federal law as: (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subsection to involuntary servitude, peonage, debt bondage, or slavery. [22 U.S.C. 7102(9)]

Labor trafficking is defined in Minnesota as facilitating or profiting from services performed as a result of debt bondage, force or threats of force, abuse of the legal process, or blackmail. [Minn. Stat. 609.281, subd. 5] Under federal law, labor trafficking is defined differently as a severe form of trafficking in persons.

This practice guide and corresponding tools in the appendix were developed by department staff in collaboration with the Child Trafficking and Exploitation Work Group, a multi-disciplinary team of more than 170 stakeholders from local, state, federal, tribal, and non-governmental agencies. Department staff appreciate the dedication and contributions made by survivors, youth, and professionals statewide from 2015 to 2020 to develop practices, policies, and resources that make up this new response.

Purpose and scope of best practice guide

Recent federal legislation regarding sex trafficking of children and youth includes [Public Law 113-183](#), Preventing Sex Trafficking and Strengthening Families Act, and [Public Law 114-22](#), Justice for Victims of Trafficking Act. The new regulations were issued in accordance with federal requirements from the U.S. Department of Health and Human Services, Administration for Children, Youth and Families, with reference to the primary federal anti-trafficking law, the Trafficking Victims Protection Act.

Previously, child victims involved in commercial sexual exploitation were served by juvenile justice. Through the Minnesota Safe Harbor law, the offense of prostitution was removed from the juvenile justice code. Since the law went into effect in 2014, children and youth have been viewed as victims of sexual exploitation, rather than offenders or delinquents. Children and youth who experience any type of sexual exploitation should be treated as victims and survivors, not perpetrators, for illegal acts they committed related to exploitation. Individuals of all ages are now considered sex trafficking victims when there is commercial sexual activity in which a third party (not the victim or the buyer) facilitates or benefits from the activity.

This best practice guide was developed to support local child welfare agency staff as they engage with children and youth who experienced human trafficking (sex or labor) or sexual exploitation. Children and youth who experienced trafficking or exploitation commonly feel a lack of trust towards adults, including systems professionals. They may not ever identify themselves as a victim of trafficking or exploitation. They may be afraid to talk about what happened due to lack of trust of the system or threats of retaliation by the trafficker. For these reasons, building rapport can take a long time; successful engagement may require patience. Even if a child or youth never shares information about trafficking or exploitation, access to appropriate services is essential. Every child within the child welfare system is at risk for sex or labor trafficking and sexual exploitation; prevention should be emphasized and integrated in all aspects of child welfare system services and response. See Section XI.

The goals of this new response to human trafficking and sexual exploitation are as follows, to:

- Be more responsive to the specific needs of trafficked or exploited children or youth, their families, caregivers, and support system throughout the child welfare system response. This includes efforts to prevent trafficking and exploitation by reducing individual, family and community risk.
- Achieve effective collaboration with the Safe Harbor No Wrong Door response, and with all levels of law enforcement response (local, county, state, federal and tribal) in dual investigations of trafficking or sexual exploitation. This includes achieving a more victim-centered and trauma-informed process of interviewing victims to limit the number of times children and youth are interviewed about trafficking or exploitation victimization, and coordinating service delivery.
- Create a nimble, flexible, and discretionary set of tools, guidance, and requirements that allows space for counties and tribes to creatively meet individual safety needs while achieving a level of standardization to reduce discrepancies and disparities in the response statewide.
- Inform and train all child welfare system staff and key multi-disciplinary professionals to accurately identify, report, assess, and coordinate comprehensive services and response to trafficked or exploited youth, their families, caregivers and support system.
- Develop and support implementation of a specialized response for trafficked and exploited youth based on best practices and mitigates the potential for unintended consequences of youth and family participation in the child welfare system.

The best practice guide is comprehensive and integrates current child welfare practice, survivor input, multi-disciplinary coordination and legal requirements. The guide begins with a section on person-centered responses and intersectionality (III), which includes response for American Indian youth and families (A) and foreign national youth (B). The remainder is organized chronologically by the stages of the child welfare process: intake and screening; investigation or child welfare response; case management; placement; and permanency. The last sections discuss prevention and resiliency, professional well-being and resources for response.

This guide will reference broader guidance from department policies. See XIII: References. All guidance is based on requirements in [Minn. Stat. 626.556, the Maltreatment of Minors Act](#).

II. Intersectionality and disproportionality

While any child or youth from any demographic could experience trafficking or exploitation, research indicates an over-representation of children of color. American Indian, African American, Latinx, and children of two or more races, are disproportionately victims of sex trafficking or sexual exploitation. Research also shows that LGBTQIA+ children (as high as one in three alleged victims), foreign nationals, and children with disabilities are at high risk for human trafficking and exploitation.

Historic and current systemic racism and discriminatory practices further marginalize and isolate youth, which can lead to increased risk for trafficking or exploitation. Fear of law enforcement and child protection involvement may make it difficult for children and families to access help or appropriate services. It is

crucial that child welfare system staff approach families and children from different backgrounds with cultural humility. Rather than making assumptions about cultural practices, language use, placement needs, or service referrals, child welfare caseworkers and supervisors should ask questions about these topics to better understand the cultural and accessibility needs of a child and family.

There are distinct legal needs and resources child welfare staff must be aware of for American Indian and foreign national youth experiencing trafficking or exploitation, explained below. The [Safe Harbor Protocol Guidelines](#) (chapter 4: Cultural Considerations) and the [Cultural Orientation Center](#) provide background to improve cultural responsiveness. See Section XI. Resources to learn more about available services and information.

A. American Indian youth and families

In Minnesota and throughout the U.S., there is a long history of historical trauma, including colonization and removal of American Indian children through the child welfare system. Sexual violence and sex trafficking have been prevalent in the American Indian community for generations, which may impact parents and children. Given this complex trauma background, when working with American Indian youth who experienced trafficking or exploitation, caseworkers should spend significant time on building trust and rapport, as well as listening to youth and determining a family's strengths, before conducting interviews, gathering information, or drafting case plans. Caseworkers should strengthen their understanding of, and relationships with, the American Indian community.

For American Indian youth who experience trafficking or exploitation, one of the greatest needs after exiting a trafficking situation is rebuilding their sense of belonging, identity, and role within the community. Caseworkers can support this by incorporating community-connectedness as a strategy through mentoring, traditional healing practices, and community-based supports, in youth's and family's safety plan or case plan. If youth or family want support from the American Indian community, it is best practice to connect them with traditional healing supports, even if they are not enrolled tribal members.

Tribal affiliation is a political status, not a racial category. American Indians may be enrolled members or eligible for enrollment in one of the 11 federally recognized tribes in Minnesota, or any of the 573 federally recognized tribes throughout the U.S. They may also be part of an American Indian community that is not federally recognized as a tribe. American Indian families live throughout Minnesota. The majority live in urban areas and may receive services through urban organizations, while others live on reservations and receive services from a tribe.

Requirements under ICWA and MIFPA

Congress passed the Indian Child Welfare Act (ICWA) in 1978, with the expressed intent to "protect the best interests of Indian children and to promote the stability and security of Indian tribes and families."

[25 U.S.C. § 1902] Minnesota adopted the Minnesota Indian Family Preservation Act (MIFPA), which adds additional requirements when working with Indian children and families. The Minnesota Tribal/State Agreement (TSA) is between the department and the 11 federally recognized tribes that helps guide local county agencies with ICWA/MIFPA implementation. See the [ICWA/MIFPA Resources link](#).

If an agency has reason to believe a child is an Indian child, all protections of ICWA/MIFPA apply until all tribe(s) have responded that a child is not eligible for membership, [C.F.R §23.107(b)(2)] or a determination was made by a court that ICWA does not apply. See Section IIIB: Child protection intake regarding ICWA inquiry.

During screening, investigation and on-going case management, agencies shall follow all ICWA, MIFPA, and Bureau of Indian Affairs (BIA) requirements. This section explains active efforts. Inquiry and notice are discussed in Section III: Intake and Screening. This section does not encompass the entirety of MIFPA and ICWA requirements.

Agency staff must make active efforts throughout the course of their involvement with American Indian children and families. Active efforts include, but are not limited to, acknowledging traditional helping and healing systems of an Indian child's tribe and using these systems as the core to help and heal an Indian child and family. [Minn. Stat § 260.762 subd. 1; see also Minn. Stat. § 260.762, subd. 3]

An important component of active efforts is involvement of an Indian child's family. Local child welfare agencies shall:

1. Work with Indian child's tribe and family to develop an alternative plan to out-of-home placement
2. Before making a decision that may affect an Indian child's safety and well-being, or when contemplating out-of-home placement of an Indian child, seek guidance from Indian child's tribe regarding family structure (including placement preferences), how a family can seek help, what family and tribal resources are available, and barriers a family faces that could threaten its preservation, and
3. Request participation of Indian child's tribe at the earliest possible time, and request tribe's active participation throughout a case. [Minn. Stat § 260.762, subd. 2]

Relevant state and federal laws, regulations and guidelines

- Minnesota Indian Family Preservation Act [Minn. Stat. 260.751 – 260.835]
- Indian Child Welfare Act [25 U.S. Code 1901 – 1923]
- The 2016 Bureau of Indian Affairs regulations for Indian Child Welfare Act proceedings [25 Code of Federal Regulations (CFR), part 23]
- The 2016 BIA Guidelines for State Courts and Agencies in Indian Child Custody Proceedings

For technical assistance regarding ICWA/MIFPA email: DHS.ICWA.MIFPA@state.mn.us.

B. Foreign national youth

Foreign national youth who experienced sex or labor trafficking are eligible to apply for benefits and services to the same extent as a refugee under federal law. A federal reporting process enables these minors to receive Interim Assistance and Eligibility letters, allowing them to apply for these benefits.

A **foreign national youth** is any person under age 18 who is not a U.S. citizen or lawful permanent resident.

Help is available for any foreign national youth who may have experienced a “severe form of trafficking in persons,” as defined in federal law, in any location and at any time until age 18. Within 24 hours of identifying a potential trafficking concern for a foreign national youth, local child welfare agencies have an obligation under the federal Trafficking Victims Protection Act (TVPA) to notify the Administration for Children and Families, Office of Trafficking in Persons (OTIP), and request assistance for a youth. [22 U.S.C. 7105(b)] Agencies must keep a record of notifications and responses from OTIP. This is a **new requirement** that applies to all current and future family investigations of both sex and labor trafficking involving a foreign national youth.

The purpose of this report is solely to provide a minor foreign national with access to benefits and services. A youth’s personal identifiable information will not be shared by OTIP with other federal agencies, unless a youth requests an interview with law enforcement. If OTIP determines that a youth is a victim of trafficking under the TVPA, they are entitled to benefits and services to the same extent as a refugee, and will be referred for comprehensive case management services.

Steps for notifying the Office on Trafficking in Persons

OTIP reporting process: Request for assistance (RFA)

1. Complete the RFA through the [Shepherd case management system](#). If needing to discuss a case with OTIP child protection specialists, call during business hours (9:00 a.m. to 5:00 p.m. ET) at 202-205-4582, or ChildTrafficking@acf.hhs.gov.
2. While a case is pending, email OTIP child protection specialists with changes or updates on a youth’s case.

See the [OTIP website](#) for information. A [free webinar](#) is available on demand to learn more.

There is a specific process to report minor foreign national trafficking victims, which serves as a request for federal assistance in securing benefits and support.

Referrals for services

After a youth has been referred to OTIP, a federally funded case manager through the [Trafficking Victims Assistance Program \(T-VAP\)](#) may be assigned by OTIP to administer emergency financial assistance and help secure access to public benefits and immigration services.

Foreign national victims of sex or labor trafficking should be referred for immigration services, specifically legal representation, either through the local child welfare agency or the assigned T-VAP case manager. If requested by youth, family, or their immigration attorney, child protection staff may have authority to provide documentation that could assist a youth or their family in pursuing immigration status on the basis of a youth being a victim of human trafficking (sex or labor). That documentation relates to applications for U and T visas. As a victim of human trafficking, youth may be eligible to apply for a U visa (for victims of crimes, including trafficking for sex or labor), or a T visa (for victims of sex or labor

trafficking). Under federal law, child protection staff are authorized to provide certifications for U visa applicants and endorsements for T visa applicants, under certain circumstances.

In addition to connecting youth with immigration representation, other potential resources include utilizing local law enforcement and federal partners like the Federal Bureau of Investigation and Homeland Security Investigation. Both federal agencies have victim assistance personnel skilled in working with this victim population and can assist with locating resources. These agencies can apply for continued presence on behalf of trafficking victims. Continued Presence (CP), a temporary immigration status provided to victims of human trafficking, can provide stability and protection to victims of trafficking while a law enforcement investigation and prosecution are ongoing. When working with minor foreign national victims of sex or labor trafficking, a collaborative effort is useful to address the need for benefits and immigration status.

When working with a minor foreign national victim, child welfare staff should consult with their supervisor and county or tribal attorney. The department's human trafficking child protection coordinators provide technical assistance, consultation and training. See Section XI: Resources.

III. Intake and screening

Children do not often self-identify as victims of trafficking or exploitation. There may be underlying concerns of trafficking or sexual exploitation in a report to child protection intake, even when a child has not disclosed.

A. Mandated reporting

Sex trafficking and sexual exploitation

Known or suspected sex trafficking of a youth is a mandated report, regardless of whether the third party sex trafficker is a caregiver. When a reporter has reason to suspect that a third party may have been involved, a report must be made to child protection intake.

Sexual exploitation is not a mandated report unless an alleged offender is a caregiver, which includes parents, siblings and household members in a caregiving role. Sometimes it can be difficult to know whether a third party facilitated or profited from a youth's victimization through a commercial sex act. Even if a reporter suspects there could be a third party, but is unsure, it is strongly recommended they make a mandated report. All sexual exploitation of children should be reported to law enforcement.

See the [Resource Guide for Mandated Reporters of Child Protection Concerns](#) for guidance on mandated reporting. The department has [online training](#) on mandated reporting, which includes guidance on when and how to report sex trafficking and sexual exploitation. If a mandatory or voluntary reporter is unsure of whether to make a report, they can call the local child welfare agency.

Labor trafficking

Labor trafficking is not a specific form of child maltreatment outlined in state law or policy, thus is not a mandated report in Minnesota. Labor trafficking typically involves use of force or threat of force, blackmail, debt, or substandard working conditions such as very long hours or unpaid wages. Labor trafficking often may overlap with other forms of child maltreatment, including neglect (educational, medical, failure to protect, or provide for basic needs); physical abuse; threatened injury; or sexual abuse. Although labor trafficking is not a form of child maltreatment under Minnesota law, all child labor trafficking is a crime and reported to law enforcement.

B. Child protection intake and screening

Some mandated or voluntary reporters may have specific concerns regarding trafficking or exploitation, while others may have more general concerns about a child. Intake staff need to listen for indicators of sex trafficking, sexual exploitation or labor trafficking, even when these concerns are not the primary reason for a call. By recognizing indicators, intake workers can ask detailed questions to gather enough information about potential trafficking or exploitation for an agency to make a screening decision. The screening flowchart and tool in Appendix A and B can assist agency staff in recognizing indicators and screening for trafficking and exploitation.

At the point of intake, agency staff should inquire about whether there is reason to believe a child may have lineage to an Indian tribe. Inquiry should occur immediately when a child comes to the attention of an agency. Inquiry is required to be made of reporters, child, parents, custodians, and other appropriate persons. [Minn. Stat. §260.761, subd. 1] See Section II: Intersectionality and Disproportionality (A: Working with American Indian Youth and Families) for information.

All reports of sex trafficking, sexual exploitation and labor trafficking must be cross-reported to the appropriate law enforcement agency within 24 hours of receiving information. Refer to the [Child Maltreatment Guidelines on Screening, Intake, and Response Path Selection](#) for guidance on screening child maltreatment reports. To satisfy the cross-reporting obligation, local child welfare agencies should report to law enforcement where an incident occurred (if known), or as established in agency protocol.

For reports of trafficking or exploitation occurring in multiple jurisdictions, with multiple alleged offenders or alleged victims, local social service agencies may find multi-jurisdictional or statewide law enforcement human trafficking task forces to be helpful. Information on law enforcement task forces is in the resources section. See Section IV: Investigation, Coordination with Law Enforcement subsection for guidance on collaborating with law enforcement.

Screening for sex trafficking and sexual exploitation

All reports of known or suspected sex trafficking, including those involving non-caregiver alleged offenders, should be screened in for a Family Investigation. Sex trafficking is defined in Minnesota as a commercial sex act that a third party facilitates or profits from. A commercial sex act is sexual contact in exchange for something of value. A third party must be someone other than alleged child victim or purchaser of a sex act. Sex trafficking by a third party includes someone making the arrangements or supplying things like cell

phone, condoms, or a location with the intent that a commercial sex act take place. It includes situations where someone other than alleged victim gets money or anything of value in exchange for a sex act.

Sexual exploitation has a broader definition than sex trafficking, which includes sexual performance, pornography, criminal sexual conduct with minors, and commercial sex without third party involvement. Reports of sexual exploitation involving a caregiver alleged offender should be screened in for a Family Investigation. Reports of sexual exploitation involving non-caregiver alleged offenders should be screened out for a Family Investigation and referred for a voluntary child welfare response. All screened out reports are to be cross-reported with law enforcement. Refer to the [Child Maltreatment Guidelines on Screening, Intake, and Response Path Selection](#) for guidance on screening child maltreatment reports. Agency staff should consult with their county attorney's office for questions regarding screening decisions.

The [Child Protection Sex Trafficking and Sexual Exploitation Intake Tool](#) in Appendix A can help guide child welfare agency supervisors, intake and screening staff, and screening teams in determining whether a report meets criteria for sex trafficking or sexual exploitation. The tool has an intake flowchart, glossary of terms, and a list of common indicators of sex trafficking and sexual exploitation. This tool should not be a substitute for the discretion of agency staff or guidance from the county attorney's office. When using the tool, its completion should be documented in child's maltreatment report (description of need section) in the Social Service Information Screen (SSIS).

When completing the SSIS child maltreatment report allegation detail in a sex trafficking allegation, the alleged offender relationship may be indicated as "non-caregiver sex trafficker" when an alleged offender is not a parent, sibling or household member in a caregiving role. However, when completing this screen with the allegation detail of "sexual exploitation or prostitution," the alleged offender relationship of "non-caregiver sex trafficker" is not applicable because the allegation detail is not "sex trafficked." With limited information about an alleged offender, or they are unknown, agency staff should use the unknown alleged offender description field in SSIS to complete a child maltreatment report.

In addition to the tool, intake and screening staff should be familiar with the [Safe Harbor services map](#), which provides contact information and service areas for the Safe Harbor regional navigators statewide. Regional navigators consult with social service agency staff to help identify and make service referrals for youth who are at risk of, or experienced, sexual exploitation or sex trafficking. All those making reports related to sex trafficking or sexual exploitation should be provided with contact information for the appropriate regional navigator. This information should be provided at the time of a report, or when a reporter is notified of a screening decision.

Screening for labor trafficking

When new reports of child maltreatment are screened, screeners may find indicators of labor trafficking. These indicators are in Appendix B: [Identifying and responding to child victims of labor trafficking](#).

The primary indicator screeners and screening teams should look for is a child being forced, threatened, or compelled to work for another person. Work can include both formal employment and informal or illegal activities. Alleged offenders may be a parent, guardian, sibling, or other related or unrelated caregiver; they may also be a peer, acquaintance or employer.

After identifying an indicator of labor trafficking, screeners or assigned workers should attempt to ask additional questions to conduct a labor trafficking screening. The suggested screening questions are in Appendix B: [Identifying and responding to child victims of labor trafficking](#). Instructions are in the tool. Screeners, screening teams or assigned workers may complete the tool.

Completion of the tool should be documented in the intake summary or a case note in SSIS; positive responses should be clearly identified in notes. If the tool reveals labor trafficking, these concerns should be referred for a child welfare response, if no other allegation of maltreatment. See section V: Child Welfare Response.

IV. Investigations

Reports of known or suspected sex trafficking of children require a Family Investigation, regardless of the relationship of an alleged offender to the victim, including non-family and non-household members. For an overview of practices summarized in this section, see [Sex trafficking as a form of child maltreatment: A brief guide for child protection supervisors and investigators](#). Reports of sexual exploitation with caregivers, household members, persons in a position of authority, or those with a significant relationship to a child, as the alleged offender also require a Family Investigation. Reports of labor trafficking do not require a Family Investigation, although labor trafficking may relate to other maltreatment being investigated. See section VI: Case management for guidance on service needs when labor trafficking is identified during a Family Investigation into allegations of maltreatment.

A. Coordination with law enforcement

All child protection responses to sex trafficking must be coordinated with law enforcement. [Minn. Stat., section 626.556, subd. 3f] Coordination may be required with multiple law enforcement agencies across multiple jurisdictions. Safety of workers, child victim(s) and family members is critical and may be improved through active coordination efforts. While efforts should be collaborative, child protection staff should be aware that a law enforcement investigation is conducted under different statutory authority and has a different purpose, scope and outcome. Increased discussion regarding roles of multi-disciplinary partners may improve outcomes for both investigations and for victims and families.

Common areas for coordination with law enforcement can be broken down into immediate response and ongoing coordination. These include:

- Cross-reporting all allegations of child sex trafficking received by any county or tribal child welfare agency or any law enforcement agency within 24 hours of receipt of report.
- Coordination of planning and execution of respective investigations to avoid duplication of fact-finding efforts. Each agency prepares a separate report of results of its investigation.
- Jointly assess and respond to immediate safety concerns for alleged child victim and family.

- Minimize the number of duplicative interviews of alleged child victim by conducting a joint interview by a trained forensic interviewer, when possible, or utilize a child advocacy center (CAC).
- Coordinate joint interviews of primary caregivers and alleged offenders. When there is an active law enforcement investigation, child protection workers may postpone alleged offender interviews until law enforcement is able to jointly interview alleged offender. The 45-day investigation timeline could also be extended if law enforcement requests postponement of alleged offender interview.

In some cases, statewide, regional or local human trafficking task forces may be a helpful resource. When the trafficking is multi-jurisdictional or involves multiple alleged offenders or victims, child protection and law enforcement may want to consult with the BCA Human Trafficking Investigators Task Force. If acts of trafficking occurred on a reservation, or if an alleged offender or victim are American Indian, it may be helpful to contact the tribal TRUST task force members. See Section XI: Resources for law enforcement.

B. Initial face-to-face contact with alleged child victim

Upon receipt of a report, child welfare agency staff shall conduct face-to-face contact with a child reported to be maltreated. Contact with alleged victim should be sufficient to assess immediate safety of a child. The face-to-face contact with a child shall occur immediately (within 24 hours) after an agency receives information from a reporter if sexual abuse, including sex trafficking, is alleged. [Minn. Stat., section 626.556, subd. 10(j)] The contact responsibility cannot be assumed by law enforcement, or another non-child protection agency. It is best practice to connect youth with the Safe Harbor regional navigator, supportive service provider or advocate, as soon as possible.

Initial contacts between assigned child protection workers and alleged sex trafficking or sexual exploitation victims should focus on safety and meeting basic needs, while building rapport. It is not necessary, nor is it best practice, to conduct a formal interview of children at the initial meeting. There may be times when the initial face-to-face contact includes a forensic interview when coordinated with law enforcement or a CAC. Understand that an alleged victim may not be ready to disclose, or their traffickers have conditioned them not to disclose through use of fear, coercion or loyalty. It is important to remember these dynamics while interacting with alleged victims of sex trafficking or sexual exploitation.

C. Safety assessment and safety planning

Caseworkers have responsibility to assess the safety of children throughout the life of a case, and take steps to help keep them safe. The initial safety assessment should be in coordination with law enforcement, whenever possible.

The [Safety Assessment and Safety Planning Considerations](#) in Appendix E is a resource for caseworkers when discussing safety and creating a safety plan with children and families who may have experienced sex trafficking, sexual exploitation or labor trafficking. This tool provides a safety plan template for cases of trafficking or exploitation, as well as a list of immediate safety concerns and considerations.

Safety is physical, emotional and psychological. Safety planning should begin immediately and continue throughout a case. Each victim faces different safety risks, and those risks change as circumstances change. Safety plans must respond to the unique circumstances of a specific case.

Parents or caregivers may also have experienced trafficking or exploitation in the past, or may currently be victims. If so, safety planning with a youth and family should also take into account risks or concerns related to parents' or caregiver's safety. This enhances safety for both youth and parents or caregivers by promoting protective factors, and connecting them with services and supports.

Safety plans are collaborative, individualized plans developed between caseworkers, youth and caregivers, intended to address practical steps and options available to enhance safety in the event of a future incident. Creating a safety plan is a collaborative effort; youth are participants — not recipients — of a plan. Whenever possible, safety planning should be done with assistance from an advocate, Safe Harbor service provider, regional navigator, or other professional with knowledge of sex trafficking victimization and safety planning. If a child is placed in a Safe Harbor shelter or housing program, or other out-of-home placement, staff or caregivers should be involved with or made aware of the safety plan.

In all sex trafficking and sexual exploitation cases, caseworkers should evaluate safety concerns and risks related to a youth's physical and emotional needs, as well as the level of access a trafficker or exploiter has to youth. In some situations, safety risks may be so high that an out-of-home placement or change of placement is necessary. See section VII: Placement, for guidance. Caseworkers, multi-disciplinary teams (MDT), and caregivers should make every effort to protect the privacy, identity and location of victims of trafficking or exploitation to maintain their safety.

In sex trafficking or sexual exploitation cases involving caregiver alleged offenders, the Structured Decision Making (SDM) tools are required. None of the SDM tools are required in sex trafficking cases involving non-caregiver alleged offenders, as it is not designed for this type of case.

D. Interviews

Alleged child victim interviews

If a report alleges a violation of criminal statute, local law enforcement and the local agency shall coordinate planning and execution of the respective investigation and assessment efforts to avoid duplication of multiple fact-finding interviews. [Minn. Stat., section 626.556, subd. 10(b)(5)] It is important to keep in mind that youth may not want to talk, or they may not see themselves as being sex trafficked or exploited. It is important to be patient; victims should never be forced to talk if they are not ready.

All forms of human trafficking (sex and labor) and exploitation are traumatic for children. Child protection investigators should be aware of the potential trauma caused by trafficking and exploitation, as well as the impacts of this complex trauma.

It is best practice to have interviews conducted by a professional trained in forensic interviewing and human trafficking (sex and labor). Child advocacy centers (CAC) are resources for forensic interviews of children or youth of any age who have disclosed sex trafficking or sexual exploitation; single or multi-session extended

interviews can be individualized in many CACs to meet the needs of victims. A decision to request use of a CAC is made by child protection caseworkers, law enforcement officer or county attorney's office, in consultation with CAC staff.

Use of an MDT is recommended during investigations of sex trafficking or sexual exploitation. An MDT can play a critical role in deciding when forensic interviews of alleged child victims are necessary. MDTs should include child protection, law enforcement, county or tribal attorney, Safe Harbor regional navigator, specialized service provider, or other stakeholders such as an advocate, victim services, mental and medical health professionals, CAC staff and tribal representatives. MDTs involved with investigations should have a written protocol for cases of trafficking and exploitation. See section V-F: Coordinated response.

In all cases of alleged sexual abuse, including sex trafficking, child welfare agencies shall make an audio-video recording of each interview with alleged victims. [Minn. Stat., section 626.556, subd. 10(k); Minn. Admin. Rule 9560.0220, subp. 3(E)]

Primary caregiver interviews

Upon receipt of a report, child welfare agencies shall conduct face-to-face contact with child's primary caregiver sufficient to complete a safety assessment and ensure immediate safety of child. Face-to-face contact with the primary caregiver shall occur immediately (within 24 hours) if sexual abuse is alleged. [Minn. Stat., section 626.556, subd. 10(j)]

In cases involving a non-caregiver alleged offender, contact with a primary caregiver(s) should explore their level of knowledge of a youth's involvement in sex trafficking. There is a continuum of knowledge and/or participation that a primary caregiver may have, from not knowing or having any involvement to supporting or being actively involved in sex trafficking. When a primary caregiver is involved, or otherwise fails to protect a child from a trafficker, new allegations of child maltreatment must be reported to intake for screening. These allegations may be added to an existing SSIS workgroup, or a new workgroup may need to be opened. These decisions are made on a case-by-case basis. See [Minnesota's Best Practices on Family Assessment and Family Investigation](#) (page 13).

For many families, learning their child has experienced sex trafficking or sexual exploitation can be a terrifying, traumatic and even shameful process. Parents or caregivers may experience secondary trauma when their child is trafficked or exploited. Parents or caregivers may also have experienced trafficking or exploitation in the past, or may currently be victims. Child welfare agencies should compassionately provide supportive services to family members to address these concerns, which may include connecting them with Safe Harbor regional navigators or supportive services, mental health support or advocacy.

Alleged offender interviews

Law enforcement coordination is paramount in child protection investigations of sex trafficking, especially regarding alleged offender interviews. If law enforcement is conducting an investigation of allegations of trafficking, child welfare agencies shall make every effort to coordinate all communication with alleged offender, including but not limited to, conducting a joint interview with law enforcement.

The primary responsibility of child protection is the safety of children. Therefore, alleged offender interviews are often the most complicated part of non-caregiver sex trafficking investigations. A list of considerations that agency staff may want to discuss with law enforcement and/or their county or tribal attorney's when preparing to contact a non-caregiver sex trafficking alleged offender include:

- Possibility of compromising a current criminal investigation or potential criminal investigation
- Impact on the safety of alleged victim, their family or caregivers, or the caseworker
- Risk to the safety of any other currently unknown or known victims and their families
- Whether alleged offender interview may provide necessary information for an investigation or enhance the safety of child, or whether the purpose is solely to make a maltreatment determination and close an investigation.

Regardless of alleged offender's relationship to victims, child welfare agencies shall do each of the following:

- Inform alleged offender of the complaints or allegations made against them at the initial contact. This should be done without revealing the identity of reporter or any confidential law enforcement investigative data.
- Offer a face-to-face interview during the early stages of an investigation, if alleged offender is willing to be interviewed. If they are a minor, it is best practice for agency staff to seek parental permission before interviewing alleged offender. Interviews with an alleged offender may be postponed if it would jeopardize an active law enforcement investigation. [Minn. Stat., section 626.556, subd. 10(j)] Alleged offenders may also submit supporting documentation relevant to an assessment or investigation. [Minn. Stat., section 626.556, subd. 10(i)(2)]

If alleged offender is unknown, efforts should be made to identify the individual(s) responsible throughout an investigation. If alleged offender is identified, but cannot be located, efforts, in coordination with law enforcement, should be made to locate them throughout an investigation. All efforts to identify, contact, and notify an alleged offender should be clearly documented in SSIS case records. If, at the conclusion of an investigation, the identity of alleged offender or their location is still unknown, a maltreatment decision can still be made with an unknown offender. For information about alleged offender interviews, see [Minnesota's Best Practices on Family Assessment and Family Investigation](#).

E. County or tribal attorney consultation

Child welfare agency staff should consult with their county or tribal attorney during the course of an investigation to determine if it is appropriate to file a petition alleging a child is in need of protection or services (CHIPS) if any of the following apply:

- Family is not cooperating with an investigation
- Voluntary child protective services may not provide sufficient protection for a child, or
- Family does not engage in safety planning or recommended plan for child protective services, and their child continues to be exploited or trafficked.

[Minn. Stat. 626.556, subd. 10m(b)]

A CHIPS petition may also be filed by the county or tribal attorney's office on the basis of a child being a sexually exploited youth. [Minn. Stat. 260C.007, subd. 6(11)] Consultation with the county or tribal attorney's office may also be necessary when deciding on placement, and when making determinations at the conclusion of an investigation. Refer to [Minnesota's Best Practices on Family Assessment and Family Investigation](#), Appendix D, for information on when consultation may be necessary.

F. Coordinated response

In addition to coordination with law enforcement, tribes, and county or tribal attorneys, it is important to coordinate early and often with the Safe Harbor regional navigator, as well as medical and mental health professionals that are able to meet the individual needs of a victim. It is highly recommended that a victim and their family be referred to county or tribal child welfare agency case management as soon as possible. See section VI: Case management.

Safe Harbor

When caseworkers are assigned a sex trafficking investigation, one of the first steps should be contacting the Safe Harbor regional navigator to consult on resources. These individuals serve as regional points of contact on sex trafficking and exploitation issues for youth, to age 24. This may be done by inquiring about services for a hypothetical victim, providing a more detailed description of the service needs for an undisclosed victim, or if a release of information is signed, caseworker may begin coordinating a specific response with the regional navigator. For contact information, see the service referral map on the [Safe Harbor website](#).

Safe Harbor is the framework for the statewide response to sexually exploited and trafficked youth, including youth at risk of exploitation or trafficking. The Minnesota Department of Health, in partnership with the department, administers the Safe Harbor system. It has developed specialized services for sexually exploited children and youth, including shelter and housing, regional navigators and specialized services. This system is referred to as the No Wrong Door model, in which sexually exploited, sex trafficked or at-risk youth can access help through any door, regardless of how contact is made. In an investigation, engagement with Safe Harbor could include initial consultation with the regional navigator; inviting Safe Harbor participation on agency's case consultation MDT; and, when appropriate, referring youth and their family to relevant Safe Harbor services, shelter or housing.

Having an established response protocol for sexually exploited or trafficked youth is critical to improving investigations and providing services. Protocols may be created within a child protection or CAC MDT, local child welfare agency, and/or a local or regional community response. In 2017, the Ramsey County Attorney's Office and the Sexual Violence Justice Institute, Minnesota Coalition Against Sexual Assault (MNCASA), issued Safe Harbor Protocol Guidelines. The guidelines were based on the work of more than 200 stakeholders, a resource for child welfare agencies. Work is being done in several sites statewide to develop localized multi-disciplinary response protocols with the support of MNCASA. Child welfare agencies are encouraged to work with their regional navigators to actively participate in developing and implementing community protocols. See section XI: Resources.

Medical and mental health response

During an investigation, child welfare agencies may request information about medical care youth has received. This includes collateral source information about alleged maltreatment and health care for youth. Collateral information may include, when relevant, a medical exam, and prior medical records relating to alleged maltreatment, or care of child maintained by any facility, clinic, or health care professional, and an interview with treating professionals. [Minn. Stat., section 626.556, subds. 10(i)(3)(i) and (ii)]

Child victims of sex trafficking or sexual exploitation should be referred for medical and mental health evaluations and appropriate treatment as early as possible by the local child welfare agency. Chemical dependency services may also be necessary to address dependency concerns or withdrawal.

Access to medical and mental health providers trained in providing treatment and services for children who experienced trafficking and exploitation may be a barrier in some parts of the state. Safe Harbor regional navigators may help to provide referrals for medical or mental health services specific to the location and needs of a child, which could include CACs in medical settings, or in partnership with medical providers.

Medical care is critical after a youth was sex trafficked or sexually exploited. Victims of sex trafficking or sexual exploitation often suffer from health-related problems, including:

- Physical health problems associated with physical and sexual assault, including broken bones or untreated injuries
- Pregnancy or sexual health concerns, including exposure to HIV and other sexually transmitted infections, fertility issues, and other diagnoses associated with sexual violence and assault
- Somatic complaints (e.g., headaches, chronic pain), resulting from untreated mental health concerns
- Malnutrition
- Untreated chronic health conditions
- Chemical dependency, including possible withdrawal symptoms
- Mental health concerns, including PTSD, suicidal ideation/attempt, depression, anxiety, etc.

Mental health services and/or other culturally specific healing services are essential for children healing from sex trafficking or sexual exploitation. See section VI: Case management, on referring to and coordinating with medical and mental health responses.

G. Making determinations

No basis for full investigation

A child welfare agency, or agency responsible for investigating a maltreatment report, may make a determination of no maltreatment early in an assessment or investigation, close the case and retain immunity, if collected information shows no basis for a full investigation. [Minn. Stat., section 626.556, subd. 10(i); Minn. Admin. Rule 9560.0220, subp. 6a] In sex trafficking investigations, this includes situations where there is not enough information to identify a youth, or third party facilitating sex acts. The fact that an

alleged victim is missing or has run away is not sufficient circumstance for an agency to determine there is no basis for a full investigation. Agency staff should consult with their county or tribal attorney's office before discontinuing an investigation of sex trafficking or sexual exploitation.

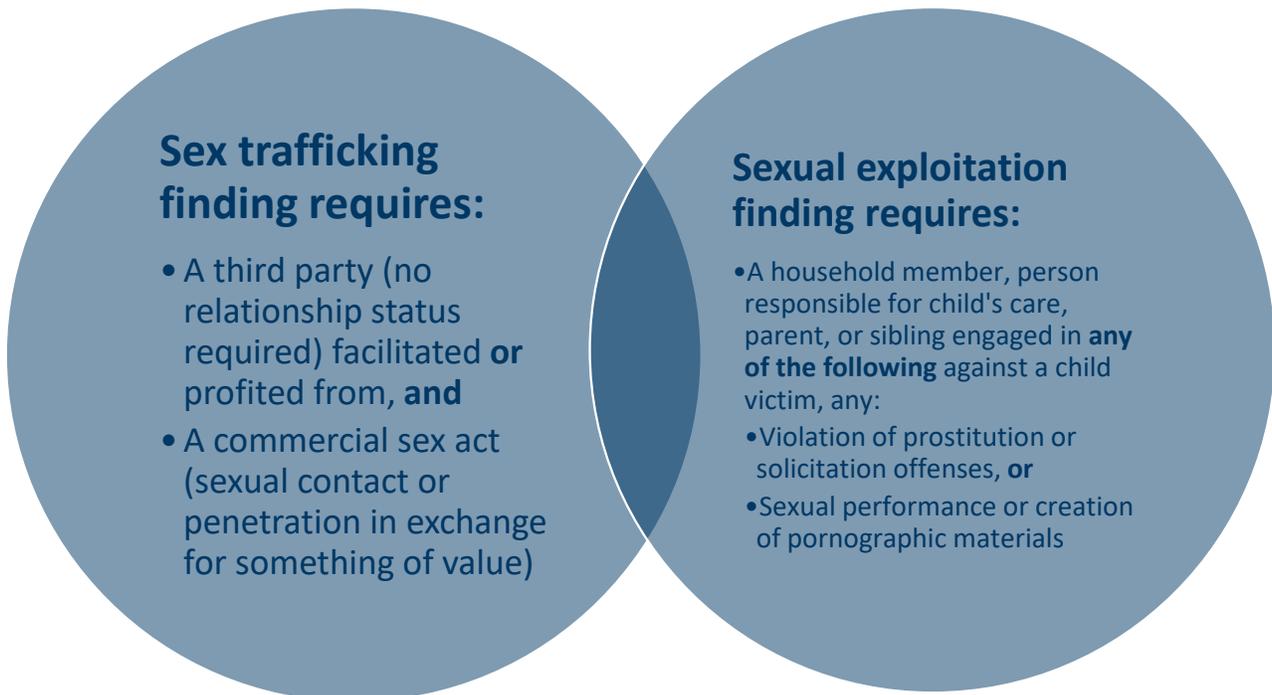
Final determinations

After conducting an investigation, child welfare agencies make two determinations, whether:

1. Maltreatment has occurred, and
2. Child protective services are needed.

Maltreatment determination

Refer to [Minnesota's Best Practices for Family Assessment and Family Investigation](#) for comprehensive guidance about making a maltreatment determination. The following information is adapted to apply to investigations of sex trafficking or sexual exploitation. Determinations are made based on a preponderance of evidence of the facts pertaining to an allegation of sex trafficking or sexual exploitation. A preponderance of evidence is defined as evidence in support of fact that is more convincing and has a greater probability of truth than evidence opposing the fact (51% or more). No determination of maltreatment shall be made when an alleged offender is a child under age 10. [Minn. Stat., section 626.556, subd. 10e(c)(g)] A determination can be made against an unknown alleged offender.



Facts related to trafficking or exploitation are gathered from the following sources (not an exhaustive list):

- Interviews (child, caregiver, alleged offender and collateral sources)
- Physical evidence (photographs of injuries, weapons, other items collected by law enforcement)

- Digital media (texts, chats, postings, images or videos)
- Records (medical, school, psychological)
- Law enforcement data or other documentation.

Supervisory or team consultation is strongly encouraged when making maltreatment determinations.

If an agency is aware that an offender has children and there is a determination of sex trafficking, a report of threatened sexual abuse is made to the child welfare agency in the jurisdiction where offender’s children reside.

When an agency determines, as part of a maltreatment investigation, that a child has been subjected to egregious harm as defined in Minn. Stat. 260C.007, subd. 14, agency staff shall consult with the county attorney about filing a termination of parental rights petition. Egregious harm may include sex trafficking, and some conduct within sexual exploitation when a parent is the alleged offender.

When maltreatment is determined, the level of severity is entered in SSIS. A table listing the definitions of severity of maltreatment is in [Minnesota’s Best Practices for Family Assessment and Family Investigation](#). Most sex trafficking will fall into the “serious” level of severity, unless death or a near fatality resulted from maltreatment.

Determination of services

A determination that child protective services are needed means that a child welfare agency has documented conditions during an investigation sufficient to cause a child protection worker to conclude that a child is at significant risk of maltreatment if protective intervention is not provided; and the individuals responsible for child's care have not taken, or are not likely to take, actions to protect them from maltreatment or risk of maltreatment. [Minn. Stat., section 626.556, subd. 10e(g)]

In cases of sex trafficking with a non-caregiver alleged offender, caseworkers may determine that ongoing case management services are needed, but there are no protection or safety concerns in the home. In this situation, case management services may be provided through child welfare case management.

H. Closing an investigation workgroup

Child welfare agencies shall conclude a Family Investigation within 45 days of receipt of a report. The conclusion of an investigation may be extended to permit completion of a criminal investigation or the receipt of expert information requested within 45 days of receipt of a report. [Minn. Stat., section 626.556, subd. 10e(a)] An active criminal investigation may cause an agency to postpone an alleged offender interview. See Section IV-D on interviewing alleged offenders for more discussion.

In addition to sending determination letters, a final summary must be sent to the individual(s) who reported the maltreatment, unless not in a child’s best interest, and SSIS documentation must be completed.

Determination letter to non-offending parent

Within 10 working days of the conclusion of an investigation, the child welfare agency, or agency responsible for investigating a report, shall notify the parent or guardian of the determination, and a summary of specific reasons for the determination.

Determination letters should also be sent to the non-resident, non-offending legally recognized parent, unless doing so would not be in a child's best interest. A decision not to send a determination letter and why it would not be in child's best interest should be clearly documented in SSIS.

Determination letters to offenders

Within 10 working days of the conclusion of an investigation, the local welfare agency should notify the person determined to be maltreating a child of the determination, and a summary of specific reasons for the determination. [Minn. Stat., section 626.556, subd. 10f]

Even though this letter is required by law, giving a non-caregiver alleged offender a letter of this nature may pose additional safety concerns for a child, family, worker and other individuals. When writing the letter, carefully consider the specific details included in light of any concerns about safety, or the integrity of ongoing law enforcement investigations. Coordination with the county attorney and law enforcement is highly recommended and should include discussion of when letters can be sent, what the content should be, and how it should be sent. Before sending a letter, notify youth and caregivers so they can be prepared for safety threats or attempted contact by alleged offender. This event may impact youth's and family's safety plan. See Appendix D: [Youth exploitation or trafficking safety plan](#).

Social Service Information System

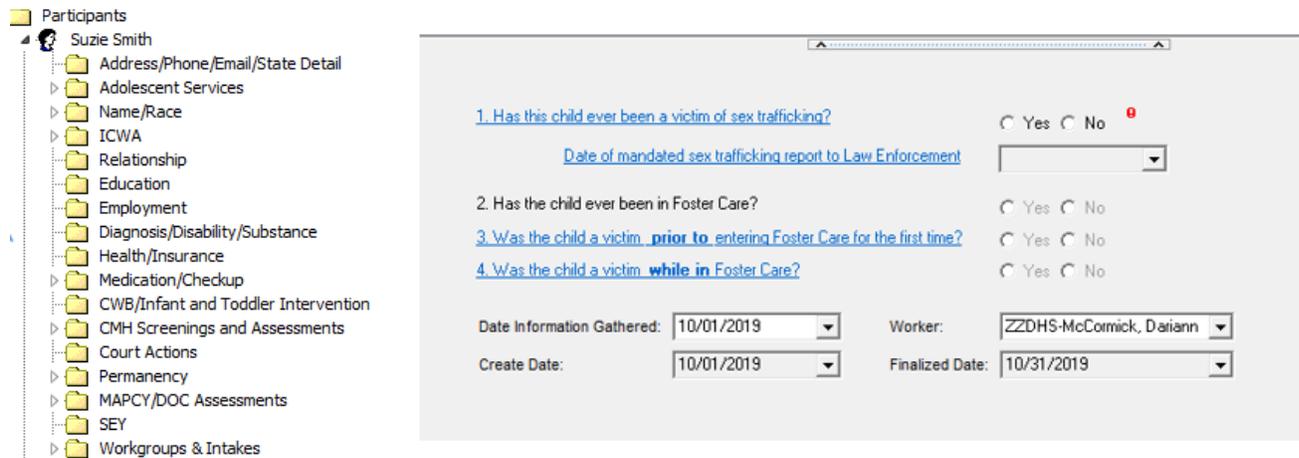
All pertinent data must be recorded in SSIS, including but not limited to, all client and collateral contacts, safety and service plans. A final summary of an investigation should also be recorded.

Sexually exploited youth (SEY) screen

Public Law 113-183 (Preventing Sex Trafficking and Strengthening Families Act) requires state agencies to report data to the U.S. Department of Health and Human Services regarding sex trafficked youth. Department staff developed the Sexually Exploited Youth screen in SSIS to meet this requirement. SSIS began collecting SEY/TRY information in V16. A new version will be released in V20.

The purpose of the screen is for local child welfare agency staff to record whether a youth is a sex trafficking victim under federal law (engaged in a commercial sex act whether or not a third party was involved). This screen must be completed on all youth, whether they are in placement or not. This screen must be completed again anytime workers discover new information that a youth may have engaged in commercial sex.

The screen is a folder located under the person node, as shown below. Each question should be answered so the screen can be completed before closing a case. The screen in V16 looks like the one below:



V. Child welfare response to sexual exploitation and labor trafficking

Child crime victims reported to child welfare agencies must receive an offer of child welfare services. [Minn. Stat. 626.556, subd. 10a(c)]

Children alleged to have experienced sexual exploitation or labor trafficking are victims of crimes in Minnesota; child welfare agencies must offer them voluntary services. Sexual exploitation is traumatic for children and their families. They often experience similar needs and safety concerns as children experiencing sex trafficking. Labor trafficking can be dangerous and cause mental and physical health concerns. The service needs of both sexually exploited and labor trafficked youth during child welfare case management are discussed in Section VI: Case management.

A. Child welfare assessment

If a report is received that a child has experienced sexual exploitation or labor trafficking by a non-caregiver, and no other maltreatment reported, it is best practice that they be referred for a child welfare assessment. The assessments for sexual exploitation or labor trafficking should be completed face to face with child and family because it is critical to assess safety related to exploitation or labor trafficking. A child welfare assessment is a way for agencies to assess strengths and needs, and to determine what services may be needed.

Youth and family participation in a child welfare assessment is voluntary. During an assessment, caseworkers must inquire about American Indian heritage and follow ICWA and MIFPA guidelines throughout a case. Voluntary child welfare services can help to prevent sex or labor trafficking. See Section IX: Prevention and building resiliency.

B. Child welfare case management

Following a child welfare assessment, a child welfare agency should offer families an opportunity to have voluntary case management services. Other referrals could be made to the Parent Support Outreach Program (PSOP), or children’s mental health, if appropriate. Child welfare services vary statewide, depending on an agency. See section VI: Case management.

VI. Case management and service planning with trafficked or exploited youth and their families

By referring youth to case management, the child welfare agency can help connect them and their family to services and supports in the community while providing agency support beyond a Family Investigation or child welfare assessment. Youth and their families should be referred to case management as soon as possible. Safety is an ongoing concern for those who experience trafficking and exploitation. Caseworkers should continue to assess safety collaboratively, and the child’s and family’s safety plans should be updated during case management. See Appendix D: [Youth Exploitation or Trafficking Safety Plan](#).

Case management services may be offered through child protection or child welfare. Youth may be referred for child welfare case management following an assessment for sexual exploitation or labor trafficking, or after a Family Investigation. At the completion of an investigation, caseworkers may determine there are no child protection concerns with the parents or caregivers, but they could benefit from ongoing case management services. In these cases, services should be open under child welfare case management; the child or family could also be referred to community-based services.

Child Welfare – Targeted Case Management (CW – TCM) may be claimed for children who are victims of sexual exploitation, sex trafficking or at risk of sexual exploitation, if they meet CW – TCM eligibility requirements. More information about claiming reimbursement for case management services for sexually exploited or trafficked youth is in [DHS bulletin #17-68-17](#), pages 14-15. CW – TCM funds are not available for case management with labor trafficked youth.

Various case plans may be applicable or required based on child’s and family’s needs, and the type of child welfare or child protection case. A variety of in-home case management service plans are available for either child protection or child welfare case management. In-home service plans must be completed within 30 days of opening for case management. If youth is placed out of home, an out-of-home placement plan discussing child’s and family’s service needs is required within 30 days of placement. See Section VII: Placement for information. For adoption-specific service planning requirements, see section VIII: Permanency.

Coordination with community-based case management services is critical. In addition to community-based services, youth may be receiving other county or tribal services, such as children’s mental health or disability services, which requires a different case plan and coordination of services. Specific programs may be available for youth and their family based on various situation, such as Education and Training Vouchers (ETV), Successful Transitions into Adulthood for Youth (STAY, formerly SELF) funds for independent living

skills for youth ages 14-25, Healthy Transition to Adulthood (HTA), Minor Parenting Services, or Parent Support Outreach. Extended foster care is in section VII: Placement.

A. Service referral and coordination

Many youth who experienced trafficking or exploitation may have endured physical, sexual or emotional abuse, as well as substance use. It is critical that they have access to specialized services that meet their immediate and long-term needs. This includes culturally sensitive and non-judgmental service providers and caregivers who understand trafficking and exploitation. This includes building resiliency and promoting protective factors that will help to mitigate damage from past and ongoing traumatic experiences. See section IX: Prevention and building resiliency.

When making referrals to community-based services, it is important to accurately explain to youth and their family all services available, potential benefits, how to access them, and how caseworkers can help connect families to services. Before referring for services, case managers must secure informed consent through a release of information.

When a case is opened in case management, the assigned caseworker should contact the [Safe Harbor regional navigator](#) as soon as possible. These professionals serve as regional points of contact on sex trafficking and exploitation issues, and resources for caseworkers, youth, and family during case management and service planning. Regional navigators and other Safe Harbor providers may have already had contact with youth or their family.

All case management services are best provided from a youth-directed, person-centered, and strength-based perspective. When working with youth who were trafficked or exploited, best practice is to first work on relationships with them and their family, involving them in determining the best resources and services. Privacy and continued building of trust are crucial. It is important to be respectful to youth, but always communicate with their parents or caregivers. This includes being transparent with youth about what information caseworkers will share with their parents or caregivers. Caseworkers should collaborate with youth and their family to determine additional services.

There is frequently a need for comprehensive and intensive therapeutic services. Child welfare agency staff should collaborate with youth, parent/guardian, and other professionals involved with a family to develop an individualized service plan using the appropriate case plan. Plans may address the need for safe housing, medical and mental health services, substance abuse treatment, cultural- or identity-specific services, and other appropriate community-based services, as needed.

When making service referrals, consider the following:

- Has youth been given a choice, and do they feel comfortable with the provider?
- Are services and providers culturally, gender-, and language-specific, if desired?
- Will services or resources be holistic for youth and their families?
- Does agency staff or individual provider understand the dynamics of trafficking and exploitation, as well as working with youth and families who have experienced trafficking or exploitation?

These questions serve as best practice standards when choosing providers and making referrals for youth and families who experienced trafficking or exploitation. See Appendix E: [Service Planning with Exploited or Trafficked Youth](#) for an overview of common needs for victims of sex trafficking or sexual exploitation, including education and employment, medical and behavioral health, legal rights, victim advocacy, connection and support for youth and family, and Safe Harbor response.

Service referral and coordination for youth experiencing labor trafficking

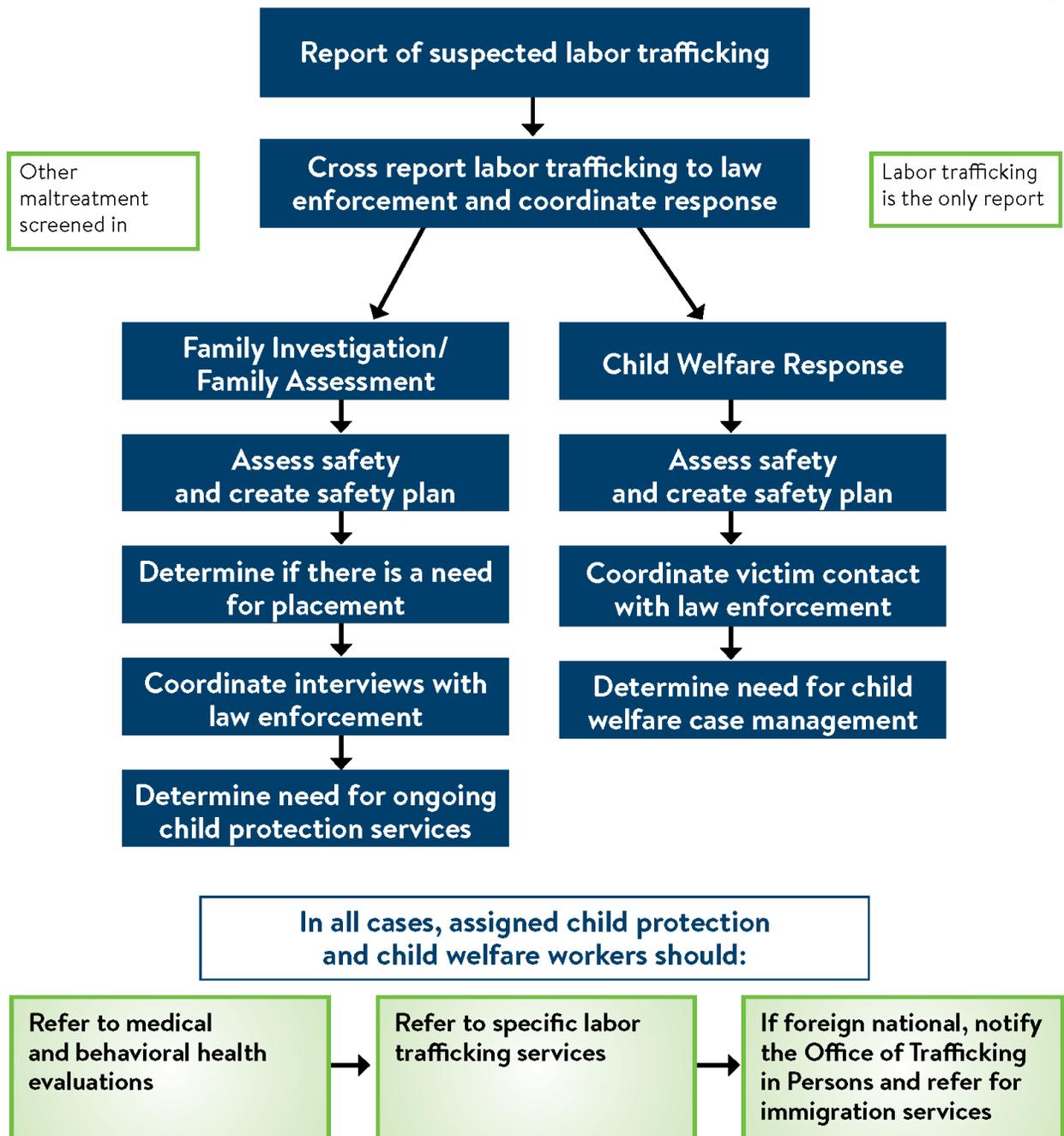
Child protection and child welfare responses involving labor trafficking should focus on securing safety and providing supportive services to children and their families.

Youth subjected to labor trafficking often experience significant trauma and may fear repercussions by their trafficker if they become involved with services. These youth often have unstable or exploitative housing (living with their trafficker), and may need out-of-home placement. If residing with anyone other than their parent or legal guardian, child welfare agencies should assess safety to decide if placement is necessary. See section VII: Placement.

The chart below illustrates key components that may be present in a labor trafficking case. If labor trafficking is suspected in an open Family Investigation or Family Assessment, consider its impact on safety planning, placement, interviews, and ongoing child protection services. If no other maltreatment is identified, an in-person child welfare assessment is preferred. The child welfare response optimally would include consultation with a multi-disciplinary team or informal multi-disciplinary partners. The response should be coordinated with law enforcement prior to initial contact with youth.

All victims of labor trafficking should be referred to medical and behavioral health care, as well as services such as legal representation, victim advocacy, case management and housing. Training, resources, service referral options, and other tools for responses are in section XI: Resources.

Child protection and child welfare responses to labor trafficking



B. Identification and disclosure in ongoing case management

If new information surfaces about allegations of abuse or neglect, including sex trafficking, this should be reported to child protection intake. The following guidance is taken from [Minnesota's Best Practices for Family Assessment and Family Investigation](#):

If a current case is in the case management phase, any new child maltreatment reports must be documented in an Intake workgroup and screened accordingly. Efforts to screen a new report with the ongoing case manager and their supervisor/manager should be made. If screened in for assessment or investigation, a new Assessment workgroup to address the new allegation(s) should be opened. All contacts should be completed in the Assessment workgroup, including a new adult interview, a new child observation/interview, and use of Structured Decision Making instruments [if applicable], based on new allegations.

When working with victims of trafficking or exploitation, it may take weeks, months or even years to self-identify or talk about their experience. If caseworkers have concerns of sex or labor trafficking or exploitation, use of the [Minnesota Department of Health](#) identification tool that assesses trafficking and exploitation of children and youth is highly recommended.

C. Closing the case management workgroup

Before closing the case management workgroup, ensure youth and family are connected with community resources and have relevant contact information for supportive resources. Before closing, case managers should ask: Are they engaged in services and do they know who to call?

The workgroup may not be closed if a child is missing from home or out-of-home placement. See Appendix C: [Runaway Debriefing Form](#) for talking with a child after they are located. The Runaway Debriefing form is in SSIS in Chronology under Documents as a Template. After an interview, the SEY screen in SSIS should be updated if new information is learned.

VII. Placement of trafficked or exploited youth

Determining if placement is necessary for a sex or labor trafficked or sexually exploited youth can be complicated because their parents or caregivers may not be the alleged offenders. When a parent or caregiver is identified as an alleged offender, Structured Decision Making (SDM) safety and risk assessment tools should be used. In cases of sex or labor trafficking or exploitation, the safety considerations and safety plan in Appendix D: [Youth Exploitation or Trafficking Safety Plan](#) should be used to help assess safety in relation to trafficking or exploitation. When a youth's safety is threatened, placement may be necessary regardless of the relationship to alleged offender.

Maintaining connection to safe and appropriate family, community, supportive services and culture are important for youth in out-of-home placement, supporting healing from trauma caused by trafficking, exploitation and other forms of maltreatment. Safe Harbor regional navigators and supportive services are critical partners in providing a specialized response for youth who experienced trafficking or exploitation.

Maintaining ongoing connections for youth will help to support a sense of belonging, which is critical to social-emotional development and healing.

Emergency placement

Law enforcement and juvenile court have authority to take protective custody of a minor. Law enforcement may place a child on a 72-hour hold if they find them in circumstances that endanger their health or safety. [Minn. Stat. 260C.175, subd. 1] Law enforcement may bring a youth to a safe relative's home, or to emergency shelter or foster care, and must notify their parents or custodian. Coordination between law enforcement and the local child welfare agency is critical in coordinating emergency placement of a minor who was identified as an alleged victim of sex or labor trafficking or sexual exploitation. When making an emergency or ongoing placement of a sex trafficked or sexually exploited youth, the Safe Harbor regional navigator, the Youth Services Network app, or the Day One Crisis Line are resources. See section XI: Resources.

Youth should be involved in the placement decision-making process at a level that is appropriate based on age and developmental level. [Minn. Stat. 260C.212 (b)] Youth should be given as much choice as possible so they feel comfortable and safe in placement. Under values of the Safe Harbor No Wrong Door model, "youth should not be made to feel afraid, isolated or trapped." [No Wrong Door, January 2013, p. 8] The practical interpretation of this value varies by discipline and community, but within the child welfare field this means that youth who experience trafficking or exploitation should be involved in the placement decision-making process, when appropriate, and should not be placed in detention centers if not charged with a crime.

Emergency placement decisions should be based on what is known about a youth and available options at that time. Safety concerns related to a youth's status of being trafficked or exploited should be considered as early as possible prior to placement. Whenever possible, youth who are recovered from a situation of sex trafficking or exploitation should be given access to medical and mental health services as soon as possible.

At times, the best placement option for a trafficked or exploited youth may be with a relative. Procedures for emergency relative placement of youth apply for trafficked or exploited youth. [Minn. Stat. 245A.035] See DHS bulletin 17-68-07, Procedures for Emergency Relative Placements.

Shelter facilities, including Safe Harbor shelters, are an alternate placement option. In the event that a youth is placed in emergency shelter, local law enforcement and child welfare agency staff shall keep the location of the shelter confidential. The location of the shelter should only be disclosed as necessary. The location of a shelter should not be disclosed if doing so places a youth's health or welfare in immediate danger. It is best practice to consult with youth and shelter staff before disclosing a location to anyone, including relatives.

Placement considerations continuum for exploited or trafficked youth

When creating an individualized plan to keep youth safe, service and placement options should be considered from least to most restrictive. The following diagram displays options to consider for youth

who experience trafficking or exploitation. All services and placements will be most effective if providers are trained in working with youth who experienced trafficking or exploitation.

Least restrictive to Most restrictive

Light blue = not an out-of-home placement by county/tribal child welfare; blue = requires out-of-home placement by county/tribal child welfare; teal = medical insurance or out-of-home placement by county/tribal child welfare

Living at home with community-based services	Family arrangement outside of home independent of child welfare agency	Title IV-E eligible shelter or housing	Family foster care	Therapeutic foster care	Residential treatment	Hospitalization or in-patient psychiatric residential treatment facility
Description: Child is living in their home and receiving services, including Safe Harbor services.	Description: Includes living with relatives, friends, independent apartment, homeless youth shelter, or Safe Harbor shelter or housing as approved by parents or guardian.	Description: Includes emergency shelter or Safe Harbor shelter or housing.	Description: Includes relative placement or non-relative family foster care. Intensive treatment may be provided. [DHS Bulletin 19-53-04]]	Description: Includes Minnesota intensive therapeutic homes or other therapeutic foster care. Juvenile screening team process required. [Minn. Stat. 260C.157]	Description: Includes any residential treatment centers or chemical dependency treatment. Accessed through medical insurance or county placement with juvenile screening team process.	Description: Only when medically necessary. Includes in-patient psychiatric treatment in facility or hospital. Accessed through medical insurance or county placement with juvenile screening team process.

A. Placement authority

To have responsibility for placement, care and supervision of a youth, a county or tribal child welfare agency must have legal authority for out-of-home placement.

Legal authority for out-of-home placement may be obtained through a 72-hour emergency law enforcement hold, a court order following a petition and emergency protective care request, or a voluntary placement agreement (VPA).

VPAs are an agreement between a parent and an agency. There are several types:

- [Voluntary Out-of-home Placement Agreement- Non-Indian Child](#) (form 1776)
- [Voluntary Out-of-home Placement Agreement Consent- Indian Child](#) (form 3374)
- [Voluntary Placement Agreement for Treatment – Non-American Indian Child](#) (form 5727)
- [Voluntary Placement Agreement for Treatment – Indian Child](#) (form 5726)
- [Voluntary Foster Care Agreement for Youth Ages 18-21](#) (form 6248)

Federal reimbursement for a portion of the costs of foster care maintenance may be claimed for Title IV-E eligible youth in Title IV-E reimbursable facilities. An agency must have legal authority for placement if Title IV-E funds are used to reimburse facilities, and placements must be entered in SSIS.

B. Making placement decisions

For both voluntary and court-ordered placements, agencies must determine the most appropriate and least restrictive setting for youth. For trafficked or exploited youth entering placement, agency caseworkers should discuss options with youth and give them as much choice in their placement as possible, as this promotes healing and self-determination, and may decrease the chance of them absents from placement. When considering the need for out-of-home placement for a sex trafficked youth, an agency shall first consider adult relatives or identified kin, unless doing so increases safety concerns, endangers their health or impacts well-being. [Minn. Stat. 260C.212, subd. 2] Relatives include those related to youth through blood, marriage or adoption; the parents or guardians of child’s siblings; or others with a significant relationship to child. [Minn. Stat. 260C.007, subd. 27] For American Indian children, “relative” is defined in the Indian Child Welfare Act. [25 U.S.C. section 1903, paras. (2), (6) and (9)]

The Best Interests Factors should be carefully considered, based on youth’s individual needs, in making the decision of where to place them. [Minn. Stat. 260C.212, subd 2(b)] Child welfare staff may assess a youth to determine their individual needs using best interest factors differently for those who are experiencing trafficking. For sex or labor trafficked or exploited youth, the following considerations may apply:

For an American Indian youth, placement provisions of the Indian Child Welfare Act and Minnesota Indian Family Preservation Act apply in making placement decisions and considering the best interests of youth. When choosing an appropriate placement for an American Indian or African American youth, child welfare agency staff should seriously consider the impact of historical trauma in the community due to forced separation and removal from their home, culture and community.

Best interest factor [Minn. Stat. 260C.212, subd. 2(b)]	Considerations for trafficked or exploited youth	Questions to ask
1. Youth's current functioning and behaviors	<p>Includes history and risk of absencing from placement and risk of recruiting or grooming other youth, or being recruited or groomed in previous placement.</p> <p>Consider the youth's mental health and/or chemical needs and if the placement can meet those needs. Consider whether the youth has a disability and their accessibility needs in the placement.</p>	<p>How likely is it that the youth will absent certain placements and where do they want to live?</p> <p>Has the youth ever recruited other youth into trafficking or exploitation? How much does trafficker still control youth's actions and will the youth recruit others?</p>
2. The medical needs of youth	<p>Youth may not have had access to medical treatment or may have been denied access to medical treatment due to the trafficking or exploitation. Medical attention includes physical, mental and chemical health. See Medical and mental health care in the Case management section.</p>	<p>Does the youth have specific medical needs that should be met? Is there need for:</p> <ul style="list-style-type: none"> • Immediate medical attention in a hospital setting (physical, mental health, chemical dependency)? • A higher level of care to meet specific mental health or chemical dependency needs? <p>Additional assessment or evaluation to determine appropriate placement?</p>
5. Youth's history and past experiences	<p>Includes current and past experiences of sex trafficking, sexual exploitation, labor trafficking, sexual abuse and other forms of maltreatment that may have caused trauma to the youth.</p> <p>Youth's history of placement</p>	<p>Does youth recognize they were a victim of exploitation or trafficking? What impact has the trauma had on their current functioning?</p> <p>Ask youth if the placement has gone well in the past, and if they want to return. Do they feel safe there?</p>

6. Youth’s religious and cultural needs	Youth’s self-identification around gender, sexual orientation and culture. Assess youth’s desire to seek services specific to these needs.	Does the placement meet the identity and cultural needs the youth identifies? Does the youth feel safe connecting to their culture?
7. Youth’s connection with a community, school, and faith community	For safety reasons, it may not be preferable to keep the youth in the same school or community. It’s important to know if a trafficker or others involved in the trafficking or exploitation situation will have access to the youth if they stay in the same community.	Does youth have strong supports in the community that they should stay connected to? Is youth involved in an investigation, prosecution or other court process in a specific geographic region? If so, is it best for them to stay close or be further away from the proceedings
9. Youth’s relationship to current caretakers, parents, siblings and relatives	Assess whether there are safe and appropriate parents, caregivers, siblings or other community supports the youth should stay connected with.	Will there be any barriers to youth maintaining these relationships, i.e., transportation, distance or communication? If necessary, are siblings able to be placed together?

A multi-disciplinary team, including the Safe Harbor regional navigator, youth’s advocate, mental health provider, non-offending parents, and past or current placement providers, should be consulted in choosing the most appropriate placement, and ongoing services during placement. [Minn. Stat. 626.558]

Safe Harbor shelter and housing programs may be good placement options because they offer specialized services for youth who experienced sex trafficking or sexual exploitation. If youth was labor and also sex trafficked or sexually exploited, it may be appropriate to refer them to a Safe Harbor shelter and housing program. A variety of program models are available statewide, including short-term shelters for minors and adults ages 18-24, transitional independent living for ages 16-24, and a residential facility for minors. When a child welfare agency places a minor in a Safe Harbor shelter or housing program, it must have placement authority in order to pay for a placement. For information on Safe Harbor shelter and housing, see the [Frequently Asked Questions](#) and the [information forms](#) on Safe Harbor shelter and housing programs.

Requirements when youth are in out-of-home placement

When youth are in out-of-home placement under custody, care and control of a child welfare agency, federal and state requirements ensure youth’s needs are met, and that they are only placed out of home as long as necessary for their safety. The goals of the child welfare system are safety, well-being and permanency. All three are key requirements for out-of-home placement of trafficked or exploited youth.

When youth are placed out-of-home, a reason for removal must be selected in SSIS when entering a placement. The reason “alleged sex trafficking” should be selected when a youth is being removed due to

sex trafficking or sexual exploitation. Case managers should work with youth and their family to create an out-of-home placement plan within 30 days. [Minn. Stat. 260C.212, subd. 1] This plan will be part of the court record, therefore, may be publicly available. This is true for court-ordered and voluntary placements lasting longer than six months. Because sex trafficking and sexual exploitation are forms of sexual abuse, child welfare agency staff should consult with their county attorney's office about how to identify victims in documents filed in court (e.g., Child 1), and any confidential forms or documents that also need to be filed. For youth over age 14, an independent living plan is also required, developed in consultation with youth. [Minn. Stat. 260C.212, subd. 12]

Transitioning youth

A 90-day transition plan is required for youth who will be discharged from foster care at age 18 or older. The responsible child welfare agency must develop this personalized transition plan with youth. It must be developed and executed immediately prior to the expected date of discharge from foster care. [Minn. Stat. 260C.203 (f)]

Youth ages 18 to 21 may be eligible for extended foster care if they were in out-of-home placement immediately prior to their 18th birthday, and meet certain criteria. See [Corrected bulletin #17-68-20C: Extended Foster Care for Youth Ages 18 up to 21](#). For extended foster care, the definition of child includes those ages 21 and under. [Minn. Stat. 260C.451] One type of extended foster care is supervised independent living. Even if youth decide not to participate in extended foster care, including supervised independent living, they can choose to participate anytime until age 21. See section VII: Placement.

Youth who experienced trafficking or exploitation and in extended foster care, including supervised independent living, may have an elevated need for specialized services. Safe Harbor specialized services, regional navigators, and housing and shelter are available for youth up to age 24. Case managers working with transitioning youth should connect them with applicable services and engage them in ongoing safety planning. See Appendix D: [Youth Exploitation or Trafficking Safety Plan](#), and Appendix E: [Service Planning with Trafficked or Exploited Youth](#).

For youth transitioning out of foster care to extended foster care or other residence or eligible services, it is critical to be aware of the potential need for mandated reporting if youth is experiencing trafficking or exploitation. Youth ages 18 to 21 in extended foster care meet the statutory definition of vulnerable adults, as they are receiving services required to be licensed by the department under chapter 245A. [Minn. Stat. 626.5572, subd. 21] Youth in supervised independent living arrangements, however, are not categorically considered vulnerable adults.

Sexual exploitation, sex and labor trafficking, and financial exploitation are all forms of maltreatment of vulnerable adults under Minn. Stat. 626.5572, and are mandated reports if abuse is suspected to have occurred or is occurring. Reports of suspected maltreatment of vulnerable adults are made to the Minnesota Adult Abuse Reporting Center (MAARC) by calling 1-844-880-1574, or entering reports online using MAARC's web-based reporting form at www.mn.gov/dhs/reportadultabuse/.

C. Cross-jurisdictional placements

The Interstate Compact on the Placement of Children (ICPC) may apply in cases involving youth who may, based on their experience of being trafficked or exploited, require placement in another state. Laws protect the best interests of youth placed outside of Minnesota, and also those placed in Minnesota in foster care, adoption or a residential facility.

Circumstances in which ICPC may be relevant include, but not limited to, placement of Minnesota youth in another state for residential treatment, as well as youth:

- Under another state’s child protection jurisdiction placed in Minnesota for treatment or safety reasons
- Under another state’s child protection jurisdiction reported as being trafficked in Minnesota (or taken into emergency custody by law enforcement)
- From Minnesota reported or found trafficked in another state
- From Minnesota who was trafficked and, due to safety reasons, needs to be placed with relatives out of state
- Placed in Minnesota with a relative or other caregiver, and a Minnesota county agency is providing supervision.

Minnesota ICPC office

Minnesota Department of Human Services
P.O. Box 64247
St. Paul, MN 55164-0247
Fax: 651-431-7628
mn.icpc@state.mn.us

Child welfare agency staff should consult with the Minnesota ICPC office for questions or technical assistance regarding the ICPC process.

VIII. Permanency for trafficked or exploited youth

This section outlines the processes and requirements for obtaining permanency for trafficked or exploited youth. There are four permanency options for youth when reunification is not an option, including kinship adoption, non-relative adoption, transfer of legal and physical custody to a relative (TPLPC), or permanent custody to agency. Deciding which permanency option to pursue for a trafficked or exploited youth should be based on their needs and wishes (especially for older youth), as well as agency recommendations based on placement history, safety and circumstances.

A. Recruitment of adoptive families

The three types of recruitment for adoptive families, include:

- **General recruitment** – mass marketing methods, such as the State Adoption Exchange (SAE), to raise public awareness of children under guardianship of the commissioner waiting for adoptive families. An SAE verification must be submitted to the department by the county agency worker through SSIS within 45 days of a child becoming legally free for adoption. [Minn. Stat. 260C.605, subd. 1(d)(3)(iv)(A)] Some youth who experienced sex trafficking may be in the process of

diagnostic assessments and may be eligible for a deferral. It may not be appropriate to post a photo of trafficked or exploited youth on the SAE due to safety reasons.

- **Targeted recruitment** – efforts are data driven and attempt to develop an available pool of adoptive and foster families who reflect the children available for adoption.
- **Child-specific recruitment** – activities such as relative searches, descriptions of a child and photos, and outreach to organizations associated with a specific child’s needs. Caseworkers or recruiters should consider the following: How recently a youth experienced trafficking or exploitation, their trauma experiences, current strengths and need for services, and ways to promote self-esteem.

Identifying and building connections

Youth who have very few connections are especially vulnerable for trafficking or exploitation. Developing their permanent connections is an important part of building resiliency; evaluate children’s current connections and supports, looking for areas to build and expand.

Although building permanent connections is an important component of recruitment services, it is a complex task. When seeking connections from a youth’s family and history, recruiters will need to ensure that all contacts are safe. In many trafficking cases, someone in a youth’s circle of contacts has engaged them in trafficking, someone known to them. Therefore, recruiters need to ensure permanent connections focus on developing safe contacts.

An effective way to ensure a recruitment plan will be safe for youth is to engage the entire permanency team in recruitment efforts. It will have knowledge of who has been deemed unsafe, providing valuable feedback for recruitment plans. Each case is different, but it might be appropriate to ask youth who they feel would not be a safe contact.

Communication with prospective adoptive families

A prospective adoptive family will need to know youth’s experience with trafficking at some point in the adoption process to be able to best meet their needs. Recruiters should talk with youth about what information to share with a prospective adoptive family, and how to share it. Depending on the youth, it will likely be important to include a therapist in conversations. An adoptive family will need to be aware that recovery from trafficking will be lifelong. Adoptive families **should** assess their abilities to handle these and other concerns for a long period of time.

Adoptive families should ensure they obtain the education and training necessary to be able to meet the needs of youth to be placed in their home. Recruiters and permanency teams should be aware of training or education prospective adoptive families can take to best prepare them to meet the needs of these youth.

B. Adoption placement decisions

When making adoptive placement decisions for children under guardianship of the commissioner, county agency staff must take into account relatives, siblings, and the best interest factors outlined in Minn.

Stat., section 260C.212, subd. 2 (b). County agency staff have an added layer of complexity when making adoption placement decisions for youth who were trafficked.

Relatives

It is possible a youth's relative or kin exploited or trafficked them. In these cases, that relative or kin must not be considered a placement option. If it is unclear whether a certain relative or kin was involved in trafficking or exploiting a youth, agency staff may need to work with them or others to determine what level of involvement, if any, an individual had.

County agency staff should ask the court to exclude relatives who pose a safety risk for a youth from the relative search, consideration, and engagement process. In no instance should staff request a blanket exclusion of all relatives from the relative search. Even if staff determine one or more relatives were involved in a youth's trafficking or exploitation, there may be other relatives who would be positive contacts, and the best adoptive placement for them.

Siblings

When considering placement with siblings for adoption, county agency staff should consider the impact this may have on a youth who has been trafficked or exploited and their siblings. This includes asking:

- Were any of the youth's siblings involved in trafficking or exploitation?
- Could placing siblings together create risk for recruitment into trafficking or exploitation?
- Would placing siblings together be a protective factor for a youth who was trafficked or exploited by promoting stability and healing?

Best interest factors

County agency staff must make adoptive placements based on individualized determinations of children's needs, using the 10 best interest factors in Minn. Stat. 260C.212, subd. 2(b). See section VII: Placement, for analyzing the best interest factors. A youth's trafficking or exploitation history is something that cannot be overcome in the short term. It is a lifelong process that an adoptive family will need to support and understand.

For an Indian child, staff must also consider the best interests of an Indian child under the Minnesota Indian Family Preservation Act. For Indian children eligible under the federal Indian Child Welfare Act, staff must ensure placements are consistent with adoptive placement preference orders under the Indian Child Welfare Act.

C. Transition planning for permanency

A transition plan for youth who experienced trafficking should include safety planning, crisis planning and resource implementation. Transition plans need to balance youth's independence and safety. A key component in making this balance successful is to include youth in planning, if appropriate. For example, does youth identify specific rules that helped to keep them safe in the past, or that could help ease their

transition into an adoptive or kinship placement? Involving youth in safety planning helps them to understand why rules will be in place, making the transition to an adoptive home more successful.

If youth experienced trafficking in the past, often their current placement is engaging in strategies to ensure they are safe and their needs are met. Permanency teams should consider what strategies can be continued in the adoptive home. It is important to consider the needs of youth beyond strategies used in the home. Does youth's previous school have specific strategies that their new school will need to continue? Is there a protective order (order for protection, harassment restraining order, no contact order, and/or domestic abuse no contact order) in place, or specific individuals the current school has been made aware of that should not have contact with a youth? Permanency teams should reference Appendix D: [Youth Exploitation or Trafficking Safety Plan](#) for assessing safety and creating safety plans with youth and pre-adoptive family.

Crisis planning

Crisis planning is a key component of a transition plan for youth, especially if they experienced trafficking. If youth has been on the run in the past, this could be a risk factor for trafficking, so their family should have a plan in place if this happens. Does youth have resources or individuals they can contact if they feel like they want to go on the run? Does the family know who to contact if youth goes on the run, including law enforcement, the National Center for Missing and Exploited Children, caseworker, service providers or friends? It is important that transition plans include resources for any crisis that could occur.

Foster care payments and adoption assistance

During transition planning, permanency teams should be mindful about discussions of foster care payments and adoption assistance. Often, youth who were trafficked or exploited are highly aware that they have been used for financial gain. It is important to be mindful of how permanency teams discuss financial aspects of an adoptive placement. Information should not be withheld from youth, but it is important to explain the purpose of foster care payments or adoption assistance so they understand or ask questions.

Placement supports

Resources are another important component of transition plans. If a family identifies indicators that a youth may be recruited or enticed into trafficking again, do they know who to contact? Does the family know about Safe Harbor resources and other supports for youth? Permanency teams should ensure families have the education necessary to meet the needs of youth, and continue to offer potential resources to help support families. Resources may include respite care and specialized support available through the MN Adopt Helpline. The [Safe Harbor regional navigator](#) is a resource for adoptive families who need specialized services, prevention education and training.

IX. Prevention and building resiliency

This best practice guide focuses primarily on the child welfare response for alleged child victims. However, a child welfare agency has an opportunity at every phase of its response to use a prevention lens and practice early interventions with youth and families at risk of exploitation or trafficking. Child welfare staff can also use their expertise in working with at-risk youth, collaborating with multi-disciplinary partners, and connecting with community-based services to help build trafficking-resistant communities. A trafficking-resistant community makes strategic investments to ensure that systems are not only working towards protection of victims and at-risk youth, but also utilizes practices and policies that prevent trafficking and exploitation.

Child welfare agencies may help prevent trafficking and exploitation by providing voluntary child welfare services for youth who have individual, familial or community risk factors. These risk factors may include high rates of truancy or running away from home or placement, ongoing parent and child conflict in the home, unmet mental health needs of a child, involvement with the juvenile justice or child welfare systems, family involvement in trafficking or commercial sex.

As a type of early intervention, child welfare agencies may provide services for youth who have run away from home, have high levels of truancy, have unmet mental health needs, or show signs of possible trafficking. For a list of indicators, see [Appendix A: Child protection screening for sex trafficking or sexual exploitation](#). The federal Preventing Sex Trafficking and Strengthening Families Act of 2013 requires child welfare agencies to work to prevent sex trafficking by improving responses when youth run away from placement. [Public Law 113-183] This includes requirements of searching for youth, notifying law enforcement, and the National Center for Missing and Exploited Children within 24 hours, keeping a case open while youth is missing, and completing a debriefing interview after they are located. See Appendix C: [Runaway debriefing form](#).

In addition to providing services for youth and families at risk of trafficking or exploitation, caseworkers should engage youth and families in strengthening protective factors, particularly through case management and safety planning. According to the Capacity Building Center for States, “protective factors are conditions or attributes of individuals, families, communities, or the larger society that reduce risk and promote healthy development and well-being of children and families, today and in the future.” [2016] The five individual and family protective factors in the Strengthening Families model are parental resilience, social connections, knowledge of parenting and child development, social and emotional competence of children and concrete support in times of need. [Browne, 2014]

The social connections protective factor is especially important for both prevention and recovery from trafficking and exploitation. Strengthening the social connections of youth and families through building family, community and peer support promotes a sense of belonging and self-value that protects youth from trafficking and exploitation. Many youth who experienced trauma at an individual or familial level are also members of communities that have experienced long-term oppression, historical trauma, or who experience discrimination based on race, gender identity, sexual orientation, ability or disability, economic status, national origin, religion, or other factors. Connecting and partnering with communities

most impacted by these harms help strengthen protective factors at both the individual and community levels, resulting in a more effective child welfare response.

X. Professional well-being

Direct child welfare work with youth and families involved in human trafficking or exploitation involves exposure of front-line staff to client pain, suffering and trauma. As a result, workers are susceptible to experiences of secondary stress that is often referred to as secondary traumatic stress, compassion fatigue or vicarious trauma [STS/CF/VT]. Workers may also experience moral injury, a somewhat related cognitive-emotional response to situations which violate one's personal moral or ethical beliefs.

It is imperative in work with sex or labor trafficking and exploitation that workers and child welfare agency administrators are aware of the risk of secondary stress inherent in this work, and that workers and agency administrators are intentional about addressing this challenging aspect of the day-to-day work. Self-care strategies are important in establishing a baseline of personal resilience, critical to worker well-being. However, such strategies alone are often ineffective in preventing or mediating STS/CF/VT. Among strategies particularly effective in addressing STS/CF/VT are timely and regular debriefings, and reflective supervision.

Underlying any effective response to STS/CF/VT is the commitment of child welfare agencies and administrators to recognize the critical nature of this dynamic and provide ongoing support to individual, supervisory and organizational strategies to address this. Recognizing the impact on caseworkers ensures protection for youth in their care by improving health.

XI. Training, assistance and resources

A. Training and technical assistance

Child welfare agency staff may contact the department's Rapid Consultation at 1-888 -234-1138, or the human trafficking child protection coordinators at DHS.Safeharbor@state.mn.us for technical assistance or information on identifying and responding to trafficking and exploitation.

It is highly recommended that all staff working directly with youth experiencing trafficking or exploitation receive training. Training on the child welfare system response to human trafficking is available through the department's Child Welfare Training System. Agencies may request trainings by contacting the department's Training Unit at dhs.csp.training@state.mn.us. Child welfare staff can sign up through Trainlink, or contact DHS.safeharbor@state.mn.us.

Many additional online webinars and trainings are available through the department, the Minnesota Department of Health, and Safe Harbor regional navigators. For training offered through the Minnesota Department of Health, see <https://www.health.state.mn.us/communities/safeharbor/>, or contact the Safe Harbor training coordinator at health.safeharbor@state.mn.us.

Additional training opportunities are available through national entities such as:

Health, Education, Advocacy, Linkage (HEAL). The HEAL Education and Training Committee focuses on educating health care providers about trafficking and making relevant, evidence-based training resources more accessible: <https://healtrafficking.org/webinars/>

National Human Trafficking Hotline service providers offer critical support to victims and survivors of human trafficking. Victims and survivors often have ongoing, complex needs, including case management, shelter, legal services, and mental health care. Social service organizations in human trafficking and allied fields are well positioned to identify, support, and protect victims of human trafficking through their work: <https://humantraffickinghotline.org/resources>

National Center for Missing and Exploited Children provides training, technical assistance and resources to law enforcement personnel and others who investigate cases of missing and exploited children: <http://www.missingkids.com/ourwork/training>

Office for Victims of Crime – Faces of Human Trafficking. The series is intended to be used for outreach and education efforts of service providers, law enforcement, prosecutors, and others in the community. The series includes information about sex and labor trafficking, multi-disciplinary approaches to serving victims of human trafficking, effective victim services, victims' legal needs, and voices of survivors: <https://ovc.ncjrs.gov/humantrafficking/publicawareness.html>

B. Resources for response

Resources that caseworkers can refer to or consult is below. For survivors of human trafficking or sexual exploitation, prioritize safety and meeting their immediate needs for medical care, food, shelter and clothing. There are widespread gaps in housing and emergency assistance for sex and labor trafficking victims statewide. Safe Harbor regional navigators can assist in finding services or housing, and the department's human trafficking child protection coordinators are available for case consultation and coordination.

For assistance with multi-disciplinary Safe Harbor protocols, caseworkers are encouraged to consult with their regional navigator, and utilize the [Safe Harbor Protocol Guidelines](#), [Safe Harbor Protocol Writing Guidebook](#), and [Protocol Development Starter Kit](#), at the Minnesota Coalition Against Sexual Assault. Other Information, training and resources are at <https://www.mncasa.org/sexual-exploitation-trafficking/trafficking-tools-resources/>. For labor trafficking response protocol development, see the Labor Trafficking Protocol Guidelines at Advocates for Human Rights at http://www.theadvocatesforhumanrights.org/labor_trafficking_protocol_guidelines.

General resources:

ACF Office on Trafficking in Persons. Contact the child protection specialists at ChildTrafficking@acf.hhs.gov, or 202-205-4582 (9:00 a.m. to 5:00 p.m. EST, Monday to Friday). Access information about [response and resources for foreign national minor victims of trafficking](#).

Minnesota Children's Alliance. For a map of all Child Advocacy Centers and contact information <https://minnesotachildrensalliance.org/centers/>.

Minnesota Crime Victims Reparations Board. Victims of crime, including sex or labor trafficking, and their families in Minnesota may be eligible for financial help for losses incurred as a result of a crime. Phone 651-201-1733. For an application and eligibility requirements, visit <https://dps.mn.gov/divisions/ojp/help-for-crime-victims/Pages/crime-victims-reparations.aspx>

Minnesota Department of Health, Safe Harbor. For information on the Safe Harbor network, see www.health.state.mn.us/injury/topic/safeharbor/. The referral map for services, regional navigators, shelter and housing, is on the website. The Minnesota Day One Crisis Hotline is 1-866-223-1111.

Minnesota Department of Human Services, Safe Harbor response. Visit www.mn.gov/dhs/safe-harbor for information on the response to trafficking and exploitation of youth, or contact DHS.Safeharbor@State.mn.us

National Center for Missing and Exploited Children. Phone 1-800-843-5678 (24 hours, seven days a week), or go to <http://www.missingkids.org> for specialized training, technical assistance, analysis and recovery services for cases involving missing and exploited children and child sex trafficking. Support is available for recovery of children, support and resources for child and family. NCMEC creates and distributes missing person's posters, and operates a Cyber Tipline for making reports of a child being exploited online.

National Human Trafficking Hotline. Phone 1-888-373-7888 (24 hours, seven days a week), or text HELP to 233733 (BeFree); open 2 p.m. – 10 p.m. CST.

Culturally specific resources

Child Welfare Information Gateway – Cultural Competence. Introduction to resources about culturally-specific approaches for child welfare agencies at <https://www.childwelfare.gov/topics/systemwide/cultural/>.

Cultural Orientation Center. Information and access to resources from the Cultural Orientation Resource Center at <http://www.culturalorientation.net/>.

Law enforcement response resources

Minnesota Human Trafficking Investigators Task Force. Contact the Bureau of Criminal Apprehension (BCA) for a statewide law enforcement response at 651-793-7000 for the BCA 24/7 Operations Center, unless it is an emergency, call 911 immediately. Ask for the Human Trafficking Task Force. Information can be sent by email to bca.tips@state.mn.us, however, this is not answered after hours or weekends.

Trust

Minnesota Missing Person Clearinghouse: provides assistance in locating missing and endangered children and adults across Minnesota. Contact manager Jason Mielke at the Department of Public Safety. Phone 651-793-1118. Email Jason.mielke@state.mn.us

Homeland Security Investigations hotline. Contact 866-347-2423. Investigators or supervisors can ask to speak to the trafficking group supervisor and the victim assistance specialist.

U.S. Department of Homeland Security. For guidance on how to provide documentation for U or T visas. See U and T visa Law Enforcement Resource Guide for federal, state, local, tribal and territorial law enforcement, prosecutors, judges and other government agencies at www.dhs.gov/publication/u-visa-law-enforcement-certification-resource-guide.

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Child protection screening of sexual exploitation and sex trafficking

A screener or screening team can use this tool when they believe a reporter may be sharing information related to sex trafficking or sexual exploitation. In combination with supervisory discretion, this tool can help determine if a report meets criteria and which response path should be selected. Screen in all sex trafficking reports for child protection investigation regardless of child's relationship to the alleged offender [[Minn. Stat. 626.556 subd. 2\(n\)](#)]. Screen out sexual exploitation reports involving non-caregiver alleged offenders and refer them for a child welfare response.

Terms used in this tool:

Exchange for anything of value: Trading money, drugs, shelter, food, protection, etc.

Facilitate: Receiving or obtaining (getting from someone), recruiting (inviting, asking), grooming (befriending, talking into, persuading), harboring (keeping in a place), providing (bringing)

MAARC: Minnesota Adult Abuse Reporting Center (1-844-880-1574)

Profit: Receiving money or anything of value, which may include drugs, alcohol, food, shelter, transportation

Pornography: Depiction of actual or simulated sexual conduct [[Minn. Stat. 617.246 subd. 1\(f\)](#)]

Regional Navigator: Regional point of contact for sexual exploitation and sex trafficking, including connecting exploited, trafficked or at-risk youth with appropriate services, outreach or education

Sexual assault: Non-consensual sexual contact or certain sexual conduct between an adult and a child [[Minn. Stat. 609.342-609.3451](#)]

Sexual contact or penetration: Intentional touching of one's intimate parts, or any intrusion into body openings [[Minn. Stat. 609.341, subd. 11 and 12](#)]

Sex trafficking: Defined in Minnesota as the act of a third party, not the purchaser or the victim, facilitating or profiting from a commercial sex act performed by another person [[Minn. Stat. 609.321 -609.322](#)]

Sexual exploitation: Includes all commercial sex acts and non-commercial sexual abuse [[Minn. Stat. 260C.007 subd. 31](#)]

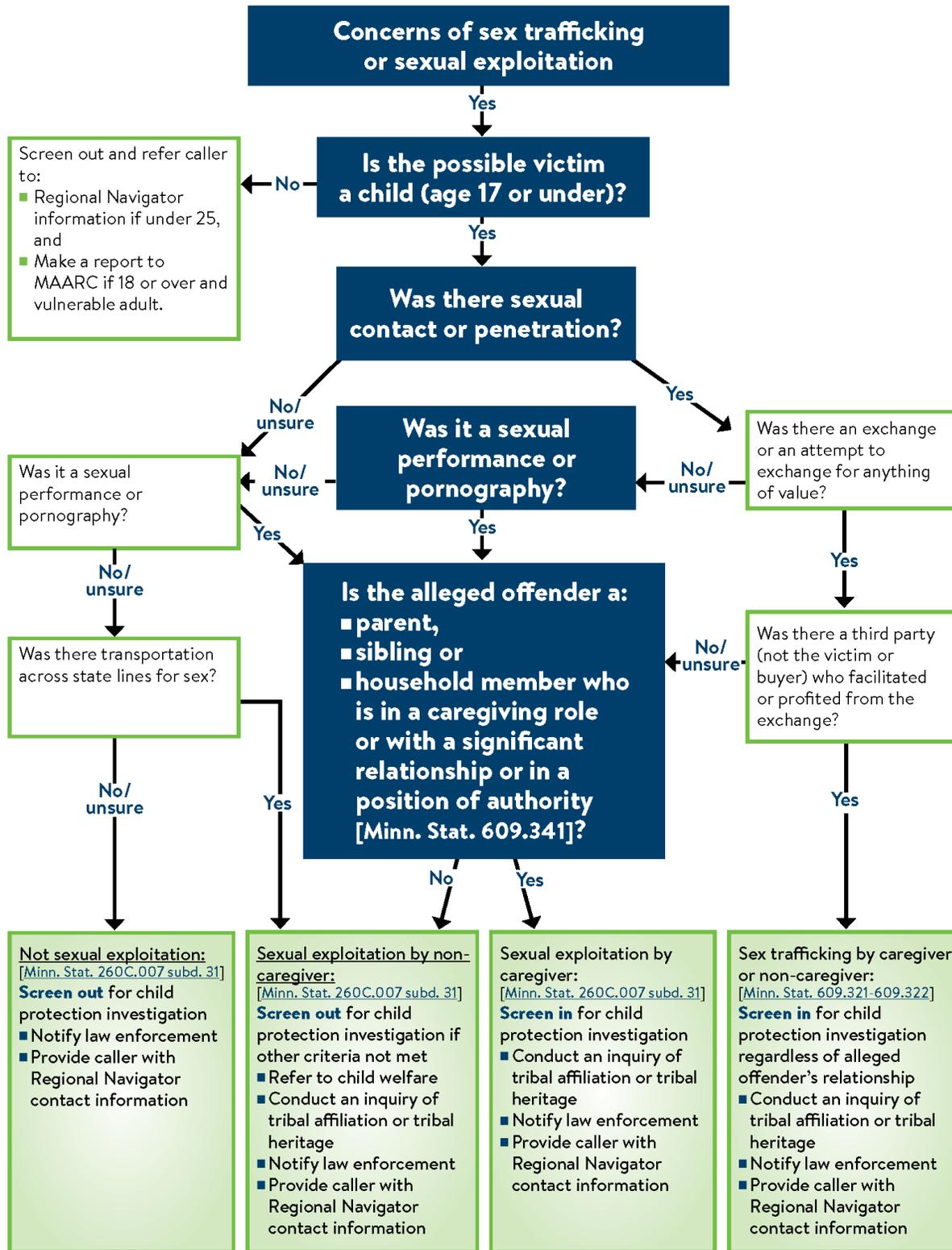
Sexual performance: Any play, dance or other exhibition presented before an audience or for purposes of visual or mechanical reproduction that uses a minor to depict actual or simulated sexual conduct [[Minn. Stat. 617.246, subd. 1\(d\)](#)]

Indicators of sexual exploitation or trafficking

Each situation is unique and indicators alone should not be used to make a screening determination.

- Missing from home for extended time and unaccounted for; running away multiple times; kicked out of home
- Signs of a controlling relationship or intimate partner violence
- Access to money/large amounts of cash, clothes or other expensive belongings youth could not afford on their own
- Use of social media and apps commonly associated with sex trading
- Multiple hotel cards; staying in hotels known for trafficking; pictures taken in hotel rooms
- Branding tattoos or markings; may be name of trafficker or other ways of being marked by a trafficker
- Association with others known to be involved in trafficking, exploitation or sex trading
- Family members involved in sex or labor trafficking, prostitution or promotion of prostitution
- Involvement in law enforcement stings or investigations related to prostitution, solicitation or sex trafficking

Appendix A. Child protection screening and intake flowchart



Appendix B. Labor Trafficking Screening Tool

Identifying and responding to labor trafficking of children

What is labor trafficking?

Labor trafficking is when a person is compelled to work for the benefit of another person by use of force, threats, intimidation, blackmail or debt bondage [[Minn. Stat. 609.281, subd. 5](#); [22 U.S.C. 7102\(9\)\(B\)](#).] Work includes formal employment and informal services including illegal activities.

How can child welfare staff identify labor trafficking?

Early identification of sex and labor trafficking is the key to establishing the local child welfare agency response, and connecting children and families to services. Many children experience labor trafficking at the same time as sex trafficking or other maltreatment. The indicators below are common signs that a child may be experiencing labor trafficking. The screening tool provided on the back of this document should be completed whenever indicators of labor trafficking are present.

What is the child welfare system response to labor trafficking?

Labor trafficking is not a mandated report in Minnesota. However, labor trafficking is a serious crime and can be very dangerous for children. When labor trafficking is identified, consider immediate safety risks and cross report to law enforcement. All victims of labor trafficking should be offered voluntary child welfare services. Visit www.mn.gov/dhs/safe-harbor for more guidance on the child welfare system response.

Indicators of a child at risk for labor trafficking

Victims may be any gender or race/ethnicity, or have any immigration status. They may be experiencing any of the following:

- Can't move freely or not allowed to come and go at will
- Accompanied by a person who speaks for them
- Not permitted to use phone or other communications, especially if restricted from contacting family
- Someone controls their transportation
- Unsure of day, date, month or year
- Frequent moves or doesn't know where they live
- Unusual living/work space (may include tinted windows, security cameras, barbed wire, people sleeping/living at worksite)
- Wears the same clothes over and over, or routinely wears clothes not in season
- Not in control of personal identification
- Someone else controls their money or collects their earnings from work
- Explanation of work situation doesn't make sense; seems scripted
- Seems afraid to answer questions
- Fearful of employer
- Long work hours; exhausted; hungry
- Owes a debt to employer
- Foreign national children who are living with people who are not their parents or guardians, and their relationship is unclear

See signs? Continue to the labor trafficking screening tool on the other side of this page.

Labor trafficking screening tool

The screening tool consists of two questions. The first question is about whether the child is working for someone else and the second is about whether the child has been compelled to work. If the answer to both questions is yes, the child in question may be a victim of labor trafficking. The screening tool is intended for the screener, screening team, assigned worker or supervisor to use in reviewing information known about a child who shows signs of labor trafficking. It should not be used to conduct an interview of a child or family, nor is it intended as a self-assessment. Document responses to both questions in the Social Service Information System (SSIS).

1. Is the alleged victim providing labor or services for another person?

Yes No Unsure

Examples:

- The alleged victim is formally employed by the alleged trafficker.
- The alleged victim is formally employed by another person and the alleged trafficker is benefiting.
- The alleged victim is engaged in illegal activities for the benefit of the alleged trafficker, such as theft, panhandling, drug trafficking or identity theft.
- The alleged victim provides informal services for the benefit of the alleged trafficker, such as babysitting, housework, home health care, day labor or working “off the books.”

2. Does the alleged victim appear to be compelled in any way to provide the labor or services?

Yes No Unsure

Examples:

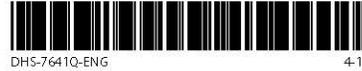
- The alleged victim cannot access their personal documents.

- The alleged victim owes money to their boss, the person who hired them, the person who is housing them or the person who helped them find the job, and are unable to reduce their debt through reasonable work. For instance, when money is taken directly from their pay to cover a debt or for travel, and the amount they owe increases or does not decrease.
- The alleged victim is afraid something bad will happen to them or someone else if they stop providing the labor or services. This includes actual or threatened physical harm or death, loss of housing and blackmail.
- The alleged victim is physically confined, monitored or isolated to keep them working.
- The alleged victim has been threatened with legal consequences such as arrest, immigration enforcement actions, reports to child protection, or other civil actions.
- The alleged victim is providing labor or services as a result of a false promise of a benefit such as pay, education, immigration status or a better life.
- A close emotional or familial relationship is being used to manipulate the alleged victim into providing labor or services (beyond standard family relationships and expectations).

Appendix C. Runaway Debriefing Form



CHILDREN AND FAMILY SERVICES - CHILD SAFETY AND PERMANENCY



Runaway Debriefing Form

This form must be completed by the assigned worker within 24 hours of the youth's return after running away from a placement. Prioritize safety and meeting any unmet immediate needs of the youth. The answers to the questions from this form should help the worker determine the most appropriate placement for the youth.

YOUTH NAME		CASEWORKER NAME	
DATE MISSING FROM	DATE RETURNED	DATE OF DEBRIEFING	
DATE UPLOADED INTO SSIS		DATE SEY SCREEN COMPLETED	
What type of placement authority does the county have for the youth? (72-hour hold, court-order, Voluntary Placement Agreement)			
How was the youth located or returned to care?			

Discussion questions for youth

1. Do you feel safe to talk right now? If not, what would help you feel safe?
2. Can you tell me more about how you returned?
3. What was going on before you left?

4. Can you tell me about what would have kept you from leaving?
5. I am curious about your patterns of leaving. What have you noticed? What is the longest time you have been gone?
6. Did you tell anyone or did anyone help you make your plan to leave? If so, tell me more about that.
7. Can you tell me about where you went and what did when you left? (A typical day? School attendance?)
8. Can you tell me about where you stayed or slept most of the time when you were gone?
9. How did you get food or other necessities while you were gone?
10. Were you hurt or injured in any way while you were gone?

10a. Did you get medical care anywhere while you were gone? Is there anything you want to see a doctor for now?
10b. Are you worried about pregnancy or sexually transmitted infections?
11. When you were gone, did anyone touch you in a way that you did not like or that made you uncomfortable? Has anything like that happened to you any other time?
12. Sometimes people do sexual things to get food, a place to stay or something else. Did anything like that happen to you?
12a. If so, did anyone else help arrange it or get anything for it, like money, drugs or something else?
13. Did you use drugs or alcohol while you were away? When was the last time you used?
14. What was the best thing about being away? And what was the worst?

15. *(If the youth has a child and had the child with them while missing)*
 How did you care for your child while you were gone, and does your child need anything right now?

16. Is there an adult (like someone at school, a probation officer, an advocate or a friend's parent) that you trust and could talk to if you feel like you want to leave again? If so, would you mind telling me who?

17. Is there anything that I or someone else could do right now to help you feel safe or to keep you from leaving again?

Approval and documentation

CASEWORKER'S SIGNATURE	DATE
SUPERVISOR'S SIGNATURE	DATE



For accessible formats of this information or assistance with additional equal access to human services, write to DHS.info@state.mn.us, call 651-431-4670, or use your preferred relay service. ADA1 (2-18)

list

Clear Form



Youth Exploitation or Trafficking Safety Plan

Specific safety concerns regarding trafficking or exploitation:

Other immediate safety concerns:

What have the youth and/or their family done to address safety concerns?

What is going well for the youth and/or their family?

Who does the youth and/or their family identify as a support? (Contact information)

What other agencies or community supports are available?

Next steps (who, what, when, where) to address current safety concerns:

Signatures and phone numbers of participants:

Crisis and specialized service phone numbers
Emergency: 911
County mental health crisis or after hours phone: _____ (24 hours)
Mental health crisis text line: Text "MN" to 741741 (24 hours)
Safe Harbor Regional Navigator: _____
National Human Trafficking Hotline: 888-373-7888 (24 hours)
Day One Crisis Hotline: 1-866-233-1111 (24 hours)
National Center for Missing and Exploited Children: 1-800-843-5678
Other: _____

Appendix D. Youth Exploitation or Trafficking Safety Plan

Considerations for Safety Assessment and Planning with Sexually Exploited or Trafficked Youth

Instructions: The questions below are considerations to guide child welfare/child protection case workers before completing a safety plan with a youth and/or their family, caregiver or other supports. These considerations are intended as a reference and should not be given directly to a youth or their family. See www.mn.gov/dhs/safe-harbor for information about child welfare system response for trafficked or exploited youth.

Immediate Safety Concerns

1. Is the youth currently missing from home or care? If yes, how long have they been missing? Does the youth stay in contact with people when missing, and if so who and how? Have they been reported as missing (law enforcement and National Center for Missing and Exploited Children)?
2. Is the youth currently at risk of harm to self or others?
3. Does the youth need immediate medical care? Have other medical needs been met recently?
4. Are the youth's basic immediate needs met? (Consider whether they are hungry, thirsty, need clothes, a shower, or safe place to stay.)
5. What other needs are unmet? (This includes language, culture or identity support, or sense of belonging.)
6. Does the youth feel safe in their current situation? (Includes housing, work, school, community, social media, etc.)
7. To what degree does the youth identify themselves as being trafficked or exploited? To what degree do their caregivers identify the youth as being trafficked or exploited?
8. Is the youth in contact with the alleged offender? How is that contact made?
9. Does the trafficker or exploiter know the current location of the youth and their caregivers?
10. Is there a current or past Order For Protection, Harassment Restraining Order or Domestic Abuse No Contact Order in effect for the youth and/or family members?

Considerations for assessing safety and developing a safety plan

General safety planning questions

1. What is going well for the youth, their family and/or caregivers right now? What are the major concerns?
2. What has worked to keep the youth safe so far? What are the youth's or caregiver's skills regarding safety?
3. Who is supportive of the youth and caregivers? Who can be contacted for help and how can they be contacted?
4. How can caseworkers help support youth and caregivers, and connect them with the services they need to stay safe?
5. If there is tension at home/out-of-home placement, what may work for caregivers or supports to reduce tension?
6. What else can be done to help prevent other safety concerns from happening?

Safety planning questions for trafficking or exploitation

1. If alleged offender knows the youth's current location or has contact with them, what steps can their family take to help keep them and family members safe?
2. Who can the youth tell, and how will they contact them, if they are contacted by alleged offender? Is the youth willing to talk with someone about their situation?
3. If youth is in a trafficking situation or is exploited, how can they keep themselves safe? What specific steps can be taken to protect against identified threats or risks?



For accessible formats of this information or assistance with additional equal access to human services, write to DHS.info@state.mn.us, call 651-431-4670, or use your preferred relay service. ADA1 (2-18)

Appendix E: Service planning with trafficked or exploited youth



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Service planning with trafficked or exploited youth

The service needs and strengths of each youth are unique for each individual. Every family has different protective factors and provides their own strength-based support. Service planning for sex trafficked or exploited youth may include any of the following.

1. Safe Harbor response

- a. Connection to the Regional Navigator or supportive services
- b. Support groups and survivor mentoring/peer support for trafficked or exploited youth
- c. Shelter and housing
- d. Sex trafficking and exploitation prevention education

2. Education, livelihood and transportation

- a. Education (school attendance/truancy, Individual Education Plan or 504 plan, school setting and education goals)
- b. Life skills training
- c. Employment (determining job skills and needed training, help with getting a job)
- d. Financial support
- e. Transportation availability/options

3. Medical, mental and behavioral health

- a. Mental health support for youth (individual and family therapy, crisis support, Children's Therapeutic Services and Supports)
- b. Connection to culturally specific and traditional spiritual healing
- c. Medical care (insurance coverage, primary care doctor, reproductive health, long-acting reversible contraception, sexually transmitted infection testing and treatment, preventive care, pre-exposure prophylaxis for HIV, chronic and acute conditions, dental, optometry, transgender-specific health care)
- d. Chemical dependency treatment (including medication-assisted treatment of opioid use via buprenorphine, services for withdrawal symptoms, inpatient treatment and others)

4. Support for parents and family members

- a. Mental health support (individual or family therapy, wraparound services, support groups)

5. Legal rights

- a. Legal representation for youth (civil, delinquency/criminal, immigration, guardian ad litem)
- b. Minnesota Crime Victims Reparations
- c. Criminal justice system-related advocacy, such as access to restitution

6. Victim advocacy and witness coordination

- a. Advocacy for child and family
- b. Providing both legal advocacy within prosecutor's office and community-based advocacy

7. Connections, belonging, and normal youth development

- a. Caregiving that promotes normalcy, including determining interests, hobbies, cultivating strengths, developmentally appropriate goals, and positive youth development activities
- b. Connection to culturally specific supports in the community
- c. Social support, belonging, pro-social skills, connection to family and/or community

8. Access to vital documents and credit

- a. Credit checks, help with resolving identity theft concerns
- b. Access to Social Security card, birth certificate, identity and immigration documents

9. Specialized responses

- a. Disability services (specialized services or case management, access to Supplemental Security Income, accessibility)
- b. Trafficking-related eligibility or interim assistance letter, access to Trafficking Victim Assistance Program funding, and case management (foreign nationals)

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