



Human Trafficking Recommendations for the Texas Sunset Advisory Commission

Scope and Focus

The following policy recommendations are intended to inform the Sunset Commission's review of state agencies, programs, and investments **affecting children, youth, and families** in Texas. These recommendations emphasize evaluating the effectiveness of existing statutes and agency operations, assessing implementation and outcomes of enacted policies, and identifying statutory, regulatory, and administrative changes needed to improve efficiency, coordination, transparency, and accountability across state systems.

AREAS OF FOCUS INCLUDE:

- **Human Trafficking:** Strengthen cross-system coordination to improve prevention, training, and response efforts, while expanding access to services and long-term support for survivors.

Human Trafficking Recommendations

Cross Agency TJJD/DFPS

Background: The Texas Juvenile Justice Department (TJJD) serves a population of youth who are at heightened risk of or have experienced human trafficking, yet gaps remain in consistent identification, training, and cross-system coordination. Stakeholders report that trafficking screening and staff training are not uniformly implemented, and that youth, particularly boys, are often misidentified as offenders rather than potential victims. There is also a limited understanding of the role that trauma and substance use play in trafficking, which can affect how youth are treated, supervised, and connected to services. Additionally, coordination challenges between TJJD and other systems, particularly DFPS, can result in disruptions in care and uncertainty around custody and responsibility during transitions. Strengthening TJJD's approach to training, identification, and interagency coordination is necessary to improve outcomes and ensure trafficking-impacted youth are appropriately recognized and supported.

- **Recommendations:**

1. Enhance and standardize training for staff on:
 - a. Gender-inclusive identification protocols and training to ensure all youth, including boys and LGBTQ+ youth, are appropriately recognized as potential victims of trafficking.

Training should address and correct biases that may result in youth being misidentified solely as offenders.
 - b. Incorporate comprehensive training on the relationship between trafficking victimization, substance use, and delinquent behavior.

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- c. Implement mandatory annual training for staff that incorporates survivor perspectives and emphasizes the role of trauma and addiction in trafficking. Training should be practical, scenario-based, and relevant to frontline staff responsibilities. Integrate guidance, tools, and supervision practices that reinforce staff understanding of addiction as part of the trafficking continuum, and to ensure this perspective is reflected in case planning, service referrals, and disciplinary decisions.
2. Address inconsistencies in current screening practices by standardizing CSE-IT implementation and ensuring adequate training and fidelity, requiring routine and event-triggered re-screening (e.g., at placement changes and regular intervals) across agencies and CBOs, and embedding trauma-informed approaches into all screening protocols.
3. In coordination with DFPS, establish clear, enforceable protocols governing the transition of youth between systems, such as custody, responsibility, and service coordination for youth who become involved with TJJ, including when DFPS maintains or relinquishes custody. Protocols should define roles, responsibilities, and timelines to ensure continuity of care. Ensure youth are actively connected to appropriate placements and services upon release. Require documentation and accountability measures to prevent gaps in custody or care. Ensure continuity of care and accountability for meeting the needs of trafficking survivors across systems.

Department of Family and Protective Services

Background: The Department of Family and Protective Services (DFPS) plays a primary role in identifying and serving children who are at risk of or have experienced human trafficking, particularly within the foster care system. However, stakeholders report significant variation across Community-Based Care (CBC) regions and Single Source Continuum Contractors (SSCCs) in how trafficking is identified, screened, and addressed. Inconsistent implementation of screening tools, gaps in training, and uneven access to specialized services contribute to disparities in outcomes for youth across the state. Data fragmentation across systems and partner agencies further limits DFPS's ability to track trafficking indicators and coordinate care effectively. Additionally, challenges in interagency coordination, particularly with TJJ, can result in disruptions in custody and services during critical transition points. Strengthening DFPS's oversight of contractors, standardizing practices, improving data systems, and enhancing coordination with partner agencies is necessary to ensure a more consistent and effective response to human trafficking statewide.

- **Recommendations:**

1. Develop and enforce consistent, statewide requirements for human trafficking training, screening, and response protocols across all Single Source Continuum Contractors (SSCCs)/Community-Based Care (CBC) regions. Ensure all contractors implement training and protocols with fidelity and in alignment with DFPS expectations.
 - a. Establish clear, enforceable standards to reduce variability across catchment areas in how youth are screened for trafficking risk and connected to services. Require DFPS to monitor contractor performance and ensure equitable access to trafficking-related resources statewide.
2. Coordinate with partner agencies, including CASA and TJJ, to transition toward interoperable or unified data systems for trafficking-related information. Reduce fragmentation caused by multiple platforms (e.g., IMPACT vs. Lighthouse) and improve data sharing and continuity of care.

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3. Improve coordination with key partner agencies, including the Texas Workforce Commission, to better support youth aging out of care who are at risk of or have experienced trafficking. Require formalized coordination to improve outcomes related to housing, employment, and stability.

Texas Workforce Commission

Background: The Texas Workforce Commission (TWC) plays an important role in supporting the long-term stability of trafficking survivors through employment and workforce development services. However, stakeholders report that awareness of available workforce services among survivors and community-based organizations remains low, limiting access to critical supports. Survivors often face significant barriers to employment, including gaps in work history, unmet educational needs, mental health challenges, and trauma-related impacts that are not consistently addressed within existing workforce programs.

Additionally, workforce systems and employers may lack the training and tools needed to provide trauma-informed support, which can make employment difficult to obtain and sustain. Limited tracking of survivor-specific employment outcomes further constrains the state's ability to assess program effectiveness.

Strengthening TWC's role in outreach, service design, employer engagement, and data collection is necessary to improve employment pathways and long-term outcomes for trafficking survivors.

- **Recommendations:**

1. Direct TWC to require each LWDB to designate a staff member responsible for coordinating services for trafficking survivors, serving as a point of contact for community-based organizations (CBOs), and ensuring alignment with statewide trafficking response efforts. Establish tailored employment services that address the unique barriers faced by trafficking survivors, including resume gaps, limited work history, unmet educational needs, mental health challenges, and trauma-related barriers. Services should include flexible training pathways, supportive services, assistance in procuring ID's and other necessary documents, and individualized career planning.
2. Develop and implement standardized, trauma-informed employment pathways for trafficking survivors across all LWDBs. Ensure consistency in service delivery while allowing for local flexibility to meet individual needs. Develop training and guidance for employers participating in workforce programs to ensure they understand the needs of trafficking survivors and the commitments involved in providing supportive, trauma-informed workplaces.

Health and Human Services Commission

Background: The Health and Human Services Commission (HHSC) is central to Texas' response to human trafficking through its administration of behavioral health, substance use, and social service programs. However, stakeholders report gaps in timely access to mental health services, limited integration of substance use treatment with trafficking-specific care, and ongoing challenges related to confidentiality that hinder coordination among providers. Survivors often face urgent behavioral health needs and are at high risk of relapse or re-exploitation without rapid access to services. At the same time, the intersection of trafficking and substance use is not consistently addressed through integrated, trauma-informed care models. Community-based organizations also report that unclear or restrictive confidentiality practices can impede effective collaboration, even when information sharing is in the best interest of the individual.

Strengthening HHSC's role in rapid response, integrated treatment, and coordinated care is necessary to improve outcomes and reduce vulnerability for trafficking survivors.

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- **Recommendations:**

1. Develop and implement a 72-hour rapid-response pathway to ensure trafficking survivors have immediate access to mental health and crisis stabilization services. The pathway should prioritize timely intervention to reduce the risk of relapse, re-exploitation, or other adverse outcomes.
2. Review, clarify, and standardize confidentiality policies across programs and providers to facilitate appropriate information sharing among state agencies and community-based organizations (CBOs). Ensure policies balance client privacy with the need for coordinated, effective service delivery and do not create unnecessary barriers to care.

Department of State Health Services

Background: The Department of State Health Services (DSHS) plays a critical role in identifying and responding to human trafficking through its oversight of public health programs, provider training, and data collection. However, gaps remain in the consistency and scope of trafficking-informed medical training, the availability of gender-inclusive forensic examination services, and the integration of trafficking risk into broader public health prevention efforts. Stakeholders report that healthcare providers are often not adequately equipped to identify trafficking indicators, particularly among male victims, and that current prevention strategies do not fully account for the intersection of trafficking, substance use, and youth risk factors. Additionally, limited data collection on trafficking exposure and related risks constrains the state's ability to design targeted interventions. Strengthening DSHS's role in training, service capacity, and data collection is necessary to improve early identification, ensure equitable access to care, and enhance prevention efforts statewide.

Additionally, HHS, specifically the Health Services User Group (HSUG), administers the Texas Youth Risk Behavior Survey (YRBS). This survey has been conducted biennially since 1991 and is a primary statewide source for data on health-risk behaviors among youth. While the survey rigorously tracks traditional risk behaviors such as tobacco and alcohol use — which are declining nationally — it underrepresents several growing risks, including online safety, social media use, and mental health concerns. Updating the survey instrument would improve Texas's ability to identify emerging risks, target interventions, inform regulatory action by Texas' Attorney General and inform evidence-based policy across partner agencies, including DSHS and TEA.

- **Recommendations:**

1. Expand the availability of SANE-certified providers and ensure protocols and training are inclusive of all victims, including men and boys. Require training and support to ensure providers are equipped and comfortable conducting examinations for male survivors and increase access to these services statewide.
2. Incorporate human trafficking and exploitation risk factors into existing public health prevention efforts, including existing substance use prevention and other youth-focused initiatives. Ensure prevention strategies address the intersection of trafficking, substance use, and other vulnerabilities.
3. Modernize the Texas YRBS questionnaire to better reflect the current risk landscape facing Texas youth by: (1) app specific measures of online harms; (2) adding validated measures of problematic social media use; (3) strengthening online victimization items by expanding electronic bullying questions to include deepfake image sharing; (4) adding brief measures of loneliness and anxiety; and (5) expanding the social media section to capture in-school use frequency, school phone policies, and student compliance.

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