



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF SOCIAL SERVICES  
*Office of the Commissioner*

Kevin Erskine  
Commissioner


December 15, 2025

**MEMORANDUM**

TO: The Honorable Glen Youngkin  
Governor of Virginia

The Honorable Luke Torian  
Chair, House Appropriations Committee

The Honorable L. Louise Lucas  
Chair Senate Finance & Appropriations Committee

FROM: Kevin Erskine 

Subject: Strategic Plan for Victims of Human Trafficking

This report is submitted in compliance with Item 324.K. of the 2025 Appropriation Act, which states:

*K. The Department of Social Services shall develop a strategic plan that includes: (i) a review of best practices for providing treatment and services to trafficking victims; (ii) analysis of data gaps and recommendations for addressing them; (iii) recommendations to improve and establish additional long-term support services for trafficking victims; and (iv) training policies for mandatory reporters of suspected trafficking cases. The Department shall provide the plan to the Chairs of the House Appropriations and Senate Finance and Appropriations Committees by November 1, 2025.*

Please feel free to contact me with any questions at (804) 726-7011.

KE:kc  
Enclosure

cc: The Honorable Janet V. Kelly, Secretary of Health and Human Resources



# STRATEGIC PLAN FOR TREATMENT AND SERVICES FOR HUMAN TRAFFICKING VICTIMS

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# STRATEGIC PLAN FOR TREATMENT AND SERVICES FOR HUMAN TRAFFICKING VICTIMS

A Report for the Virginia General Assembly

November 01, 2025

## REPORT MANDATE

[2025 Appropriation Act, Section 324 K:](#)

The Department of Social Services shall develop a strategic plan that includes: (i) a review of best practices for providing treatment and services to trafficking victims; (ii) analysis of data gaps and recommendations for addressing them; (iii) recommendations to improve and establish additional long-term support services for trafficking victims; and (iv) training policies for mandatory reporters of suspected trafficking cases. The Department shall provide the plan to the Chairs of the House Appropriations and Senate Finance and Appropriations Committees by November 1, 2025.

## EXECUTIVE SUMMARY

Human trafficking is a complex crime that undermines human dignity and rights. Since 2007, the National Human Trafficking Hotline, has received more than 8,500 signals from Virginia, and identified 2,222 cases and 4,552 victims.

The Virginia Department of Social Services developed this strategic plan to improve treatment and services for victims of human trafficking, with a particular focus on youth. This plan outlines a comprehensive, survivor-centered, and trauma-informed approach to addressing the complex needs of trafficking victims across the Commonwealth. The strategic plan aims to:

- Identify and implement best practices for treatment and support.
- Close critical data gaps across agencies.
- Enhance training for mandatory reporters.
- Expand long-term, youth-specific services.
- Establish a sustainable, coordinated statewide response.

### About VDSS and Trafficking

The Virginia Department of Social Services (VDSS) partners with local departments of social services and community organizations, to promote the well-being of children and families across the Commonwealth. We proudly serve alongside nearly 13,000 state and local human services professionals throughout the Social Services System, who ensure that thousands of Virginia's most vulnerable citizens have access to the best services and benefits available to them.

Together, we work each day to serve, empower, and create opportunities for brighter futures.

Since 2011, 265 victims of sex trafficking have been identified in Virginia's child welfare information system. Children engaged with the child welfare system face an elevated risk of human trafficking victimization due to vulnerabilities like prior traumatization, social isolation, and service gaps.

## DEFINITIONS

### *Human Trafficking*

Human trafficking is the recruitment, transportation, transfer, harboring, or receipt of a person through force, fraud, or coercion for the purpose of exploitation, which includes forced labor, sexual exploitation, involuntary servitude, and slavery. The use of force, fraud, or coercion is not required to be considered for trafficking of minors.

## PROGRAM OVERVIEW

The VDSS developed this strategic plan to improve treatment and services for victims of human trafficking, with a particular focus on youth. This plan outlines a comprehensive, survivor-centered, and trauma-informed approach to addressing the complex needs of trafficking victims across the Commonwealth.

## CONTACTS

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# STRATEGIC PLAN FOR TREATMENT AND SERVICES FOR HUMAN TRAFFICKING VICTIMS

## BACKGROUND

The Virginia Department of Social Services (VDSS), in response to a directive from the 2025 Virginia General Assembly (Budget Bill HB 1600), has developed this strategic plan to improve treatment and services for victims of human trafficking, with a particular focus on youth. This plan outlines a comprehensive, survivor-centered, and trauma-informed approach to addressing the complex needs of trafficking victims across the Commonwealth. The strategic plan aims to:

- Identify and implement best practices for treatment and support.
- Close critical data gaps across agencies.
- Enhance training for mandatory reporters.
- Expand long-term, youth-specific services.
- Establish a sustainable, coordinated statewide response.

## Process and Methodology

To ensure a high-impact and evidence-based strategy, VDSS employed a **phased, lean-team approach** grounded in stakeholder engagement, data analysis, and national benchmarking. The process covered:

- **Rapid Alignment Technique:** Facilitated early consensus on goals and deliverables among stakeholders.
- **Collaborative Platforms:** Tools like Mural were used for real-time feedback and transparent progress tracking.
- **Document Mapping:** Reviewed state laws, agency policies, and national guidance to identify gaps and redundancies.
- **Stakeholder Engagement:** Conducted interviews, listening sessions, and surveys with VDSS staff, local departments, community partners, and survivors.
- **Data Analysis:** Applied both qualitative and quantitative methods to identify trends, service gaps, and opportunities for improvement.

The methodology was informed by a triangulated research model that gathered data using:

- A landscape analysis of Virginia's current systems and policies.



- A review of national and international best practices.
- Thematic coding of service and policy gaps.
- Comparative benchmarking with leading states such as Minnesota and Florida.

Where direct survivor engagement was limited due to trauma-informed considerations, secondary analysis of survivor-informed reports was used to ensure authentic representation.

### **Key Findings and Strategic Direction**

The plan identifies systemic gaps in trauma-informed care, data interoperability, training consistency, and long-term support services. To address these areas, recommendations that address consistent themes from the data gathering process are provided. Those recommendations include:

- Expanding trauma-informed housing and wraparound services.
- Standardizing and scaling mandatory reporter training using national models like SOAR.
- Modernizing data systems (e.g., CCWIS) and integrating them through the Commonwealth Data Trust.
- Establishing a Statewide Human Trafficking Commission and Survivor Council to ensure governance, accountability, and survivor leadership.

### **Policy Considerations for Future Efforts to Address the Impact of Human Trafficking**

The document also outlines a comprehensive, trauma-informed, and survivor-centered framework that can be used to inform statewide policy, funding, and programmatic decisions. In addressing the legislative mandate for the strategic plan, information was uncovered that can help inform future policy decisions:

- Strengthen protections and services for trafficking victims.
- Improve interagency coordination and data sharing.
- Standardize mandatory reporter training.
- Expand long-term, youth-specific support infrastructure.

The recommendations incorporate compliance with federal requirements under the Child Abuse Prevention and Treatment Act (CAPTA), Title IV-E, and the Victims of Crime Act (VOCA), and offer a possible foundation for additional support for Virginia's broader goals of public safety, efficient governance, and responsible investment. From a policy perspective, the key recommendations fall into four possible action-related areas:

1. **Data Modernization:** Replace legacy systems (e.g., OASIS) with the Comprehensive Child Welfare Information System (CCWIS) and integrate platforms via the Commonwealth Data Trust to enable real-time, cross-agency coordination.












2. **Training Reform:** Standardize and scale trauma-informed training for all mandated reporters using nationally recognized models (e.g., SOAR).
3. **Service Expansion:** Invest in youth-specific housing, behavioral health, legal aid, and economic empowerment programs statewide.
4. **Governance and Sustainability:** Establish a permanent Statewide Human Trafficking Commission and Survivor Council to oversee implementation, funding, and continuous improvement.

A foundation for a coordinated, sustainable, and survivor-centered system that can improve outcomes for trafficking victims across Virginia is outlined. It includes a roadmap for transforming Virginia's response to human trafficking through earlier identification and intervention; reduced re-traumatization and criminalization of youth victims; increased access to long-term, developmentally appropriate services; and improved data-driven decision-making and resource allocation.

### **How to use this document**

The document is organized to provide recommendations for each of the areas prioritized by VDSS in the original requirements. Icons are used to highlight specific points of interest and recommendations that were identified in the multiple forums used for gathering data. The icons used through the document include:

|                                                                                     |                                                                                                                |                                                                                     |                                                                                      |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
|  | Recommended outcomes that align with the stated goals of VDSS.                                                 |  | Policy or legislative related information.                                           |
|  | Short or near-term projects that can be initiated and implemented quickly.                                     |  | Opportunities for collaboration with other organizations and providers in the space. |
|  | Actions or projects that have a shortened timeline for implementation or completion.                           |  | Tools that can be leveraged to support VDSS' work.                                   |
|  | Tasks that require more planning and coordination with other stakeholders.                                     |  | Educational opportunities for consideration.                                         |
|  | Projects with longer lead times and may include significant planning and coordination with other stakeholders. |  | Youth focused recommendations and information.                                       |

Each section includes contextual information to ensure VDSS has access to a complete data set to use for decision making on the updated policies, training, or tools used in the fight against trafficking. The information provided represents the first of many opportunities available for enhanced strategic planning, data enhancements, and training. By using the recommendations in this document, Virginia can become a national leader in coordinated, survivor-centered anti-trafficking efforts, ensuring that all youth impacted by trafficking receive the protection, care, and support they deserve.

## 1 STRATEGIC PLAN

The 2025 Virginia General Assembly, through Budget Bill HB 1600, has directed Virginia Department of Social Services (VDSS) to develop a strategic plan addressing the treatment and services for human trafficking victims. The overarching goal is to improve outcomes for victims, especially youth, by identifying and implementing best practices, closing data gaps, strengthening long-term support services, and enhancing training for mandatory reporters. This preliminary phase is designed to establish the foundation for the final strategic report, clarifying objectives, methodologies, and initial findings. The intended audience includes VDSS leadership, state agencies, community organizations, and other stakeholders engaged in anti-trafficking efforts across Virginia.

### 1.1 METHODOLOGY

A phased, lean-team approach has been implemented to ensure efficient, high-impact delivery of the strategic report. The preliminary phase utilized the following tools and techniques:

- **Rapid Alignment Technique:** Facilitated initial stakeholder input and established shared understanding of objectives and deliverables.
- **Collaborative Platforms:** Employed Mural for real-time feedback and transparent progress tracking.
- **Document Mapping:** Reviewed relevant legislation, VDSS guidance, agency policies, and statewide reports to identify content gaps and redundancies.
- **Stakeholder Engagement:** Conducted interviews, listening sessions, and surveys with VDSS staff, local departments, community partners, and survivors.
- **Data Analysis:** Applied qualitative and quantitative methods to synthesize findings and identify trends.

Our research approach, grounded in evidence-based practices, draws from a wide range of trusted public sources, government-funded research, and nationally recognized benchmark data. The resulting findings are both comprehensive and credible, identified using a triangulated methodology that includes:

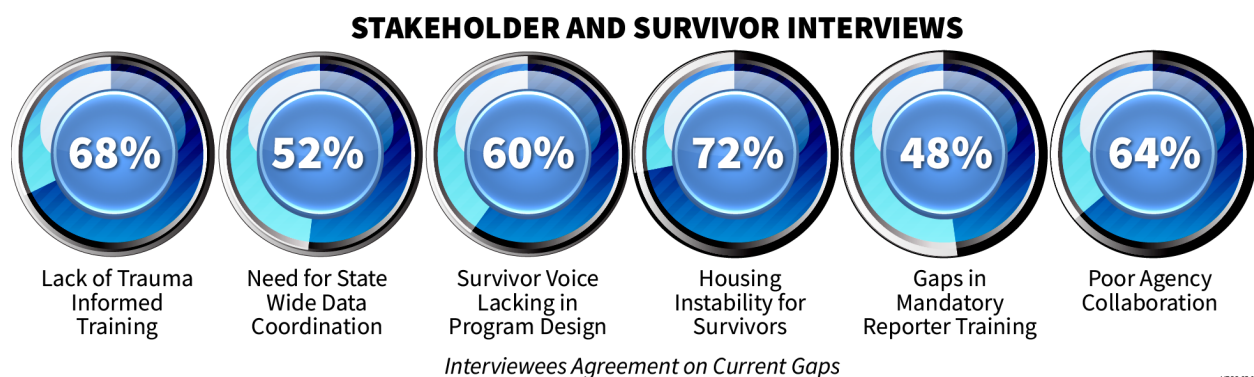
- Landscape analysis of Virginia’s current state, including policies, programs, systems, and data infrastructure, using official sources such as state agency publications, legislative updates, and regulatory guidance.
- Review of national and international best practices informed by publicly available research from organizations including the U.S. Department of Justice, Office for Victims of Crime, National Child Traumatic Stress Network, and comparable state initiatives.
- Gap identification and thematic coding to assess critical service, policy, and data shortcomings across prevention, intervention, and survivor support efforts in Virginia.
- Comparative benchmarking to align Virginia’s existing efforts against effective models from other states, and emerging trends in survivor-centered anti-trafficking work.

This structured, evidence-based methodology ensures that each recommendation is informed by documented need, successful precedent, and stakeholder-validated insight.

Any deviations from the planned methodology, such as limited direct survivor engagement due to scheduling or sensitivities, were addressed through alternative trauma-informed approaches, including secondary analysis of survivor-informed reports. Limitations encountered included incomplete data from some localities and challenges in aligning stakeholder schedules.

## 1.2 FINDINGS BY CORE AREA

The following sections summarize the findings by each core area identified by VDSS. In each section we offer descriptions of the current state of support, followed by recommendations for updating and restructuring Virginia’s human trafficking support programs. Based on the interviews, a baseline of areas for improvement was identified. **Figure 1** summarizes the findings identified during the plan development process.



**Figure 1: Current Gaps Identified Through Interviews**

When reviewing all the data gathered, consistent themes and areas for change were identified, and included in each of the following sections. A common theme in each area is collaboration between the various support providers and stakeholder organizations.

### 1.2.1 BEST PRACTICES FOR TREATMENT AND SUPPORT

State and national programs emphasize a set of best practices for the treatment and support of trafficked youth victims and adult survivors. Central to these approaches is the use of trauma-informed, survivor-centered care, which prioritizes both physical and emotional safety, fosters trust, and empowers youth to participate actively in their own recovery and service planning. These programs stress the importance of multidisciplinary collaboration, bringing together law enforcement, child welfare, healthcare providers, legal advocates, school systems, local health departments, and community organizations to ensure comprehensive and coordinated support. Additionally, screening youth for trauma and social-emotional needs using validated tools during intake and throughout the service period is recommended to inform the development of individualized care plans.

Effective interventions often draw from evidence-based models used with other vulnerable youth, such as Trauma-Focused Cognitive Behavioral Therapy (TF-CBT), Multisystemic Therapy (MST), and the Adolescent Community Reinforcement Approach (A-CRA), which address mental health, substance use, and social functioning. There are also promising residential and community-based programs incorporating strengths-based case management, mentoring, and group support, while ensuring developmentally appropriate, safe, and culturally responsive environments. Meaningful engagement of youth in decision-making, as well as the inclusion of survivor voices in program design and policy, are considered essential to reduce re-traumatization and improve outcomes.



Further incorporation of the federal ‘Trafficking Victims Protection Act’ (TVPA) into Virginia’s state legislation and local mandates could enhance protections for victims and improve continuing education for law enforcement officers. While Virginia has adopted aspects of the TVPA, particularly around definitions, assessments, and service coordination, significant gaps remain that undermine its broader anti-trafficking goals.

For example, Virginia has not fully committed to Safe Harbor laws which is legislation that ensures youth victims of trafficking are treated as victims rather than criminals or to the full decriminalization of youth involved in prostitution. As a result, some trafficked youth may still face criminal charges, retraumatizing victims and fostering mistrust in the system. By retaining prosecutorial discretion in cases involving minors, rather than fully adopting the TVPA’s victim-centered approach, Virginia risks falling short of best practices in victim protection and support.

Outreach and education are key, with street outreach programs and school-based initiatives helping to identify at-risk youth and connect them to services. Cross-system coordination, especially between child welfare, runaway and homeless youth services, law enforcement, school systems, local health departments, and healthcare, is critical for early identification, crisis intervention, and long-term support. Ongoing staff training in trauma and culture informed care and the interdisciplinary dynamics of trafficking are necessary to sustain effective responses.

These programs highlight the need for accessible legal, medical, housing, and educational resources, and require the advocacy for policies that recognize trafficked youth as victims rather than offenders, ensuring their rights and well-being are at the forefront of all interventions. Vital best practices worth noting for this initiative include:

- **Survivor-Centered and Trauma-Informed Care:** Prioritizes safety, trust, empowerment, and flexibility, tailored to individual needs.
  - Minnesota is a leader in providing this kind of care to its survivors, incorporating:
  - The Safe Harbor Law, which ensures sexually exploited youth are treated as victims, not criminals, and receive trauma-informed services through the No Wrong Door model.
  - The Minnesota Youth Trafficking and Exploitation Identification Tool (MYTEI) is a survivor-informed screening tool developed with input from culturally diverse professionals and survivor leaders.
  - The Minnesota Department of Health funds regional navigators and service providers to deliver individualized, trauma-responsive care statewide.
  - Safe Harbor utilizes a comprehensive human trafficking screening tool to collect relevant data on potential victims seeking services from their agency.
  - Maryland's Child Trafficking Regional Navigator Program serve youth up to the age of 24 who are at risk or are known victims of sex or labor trafficking. Each county/region in Maryland has a designated Regional Coordinator who partners with law enforcement agents and Local Department of Social Services (LDSS). The program is funded by state and Federal funding streams. The lead administrative agency is the United States Attorney's Office, District of Maryland.
  - The Virginia Juvenile Justice (DJJ) agency uses the evidenced-informed screening tool, Screening for Experiences and Strengths (SEAS) to identify potential victimization and trauma. SEAS includes human trafficking victimization questions (primarily sex trafficking). There are three age-specific tools for ages 0-6, 7-12 and 13-21 in both English and Spanish.
- **Multidisciplinary Collaboration:** Involves law enforcement, child welfare, healthcare, legal advocates, school systems, local health departments, and community organizations.
  - Florida is rising as a leader in data driven policy, all due to their multidisciplinary/multi-agency collaborations.
  - The University of South Florida's Trafficking in Persons (TIP) Lab was designated by law in 2023 as the state's official repository for anonymous trafficking data.
  - Florida now produces an annual statewide report that aggregates data from 30+ agencies, nonprofits, and public surveys to guide prevention, prosecution, and policy.

- The ‘TIPSTR’ database and ‘BRIGHT’ Network help visualize trafficking trends and connect survivors to services in real time.
  - Florida’s multi-agency coordination and rising prosecution rates have positioned it as a national model for evidence-based response.
  - In 2019, Florida mandated the creation of a direct-support organization to assist the Statewide Council. The Florida Alliance to End Human Trafficking supports the Council with training, outreach, and survivor engagement, with over 20,000 served since 2020.
- **Long-Term, Relationship-Based Support:** Sustained, trusting relationships are foundational before trauma-specific treatment.
    - Minnesota, again, leads national efforts with systemic, comprehensive approaches to support for their youth survivors of Human Trafficking. Current approaches include:
    - Safe Harbor Law funds a statewide infrastructure of regional navigators and specialized housing programs that prioritize long-term healing over short-term crisis response.
    - No Wrong Door model ensures youth access care from any system entry point. It’s designed to build trust over time, with flexible entry points and sustained engagement.
    - Programs like The Link’s Passageways provide tailored housing, mentorship and wraparound support for parenting youth, LGBTQ+ youth, and youth of color.
    - MYTEI screening tool was co-developed with survivor leaders and frontline providers to ensure that identification and support are trauma-informed and culturally responsive.
    - Relationship-based support is embedded in policy and practice across sectors. Minnesota’s approach is not just programmatic—it’s systemic.

A summary of the support models reviewed as part of this process is summarized in **Table 1**.

**Table 1: Evaluated Models and Features**

| Model/Approach               | Core Features                                                                 | Evidence of Effectiveness                 |
|------------------------------|-------------------------------------------------------------------------------|-------------------------------------------|
| Children’s Advocacy Centers  | Multidisciplinary Teams, child-friendly environment, trauma-focused care      | Improved outcomes, reduced trauma         |
| Mobile Response Teams (MRSS) | 24/7 crisis response, home/community-based, family/youth-driven               | National best practice, positive outcomes |
| System of Care (Bill Wilson) | Crisis intervention, stabilization, long-term support, culturally responsive. | Recognized best practice, replicable      |
| Youth Peer Mentorship        | Survivor mentors, trust-building, empowerment, group support                  | Reduced exploitation, improved coping     |

| Model/Approach                                                            | Core Features                                                                                                                | Evidence of Effectiveness                                                                                                                                                                                                    |
|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Comprehensive Case Management                                             | Holistic, survivor-driven, addresses broad needs                                                                             | Improved engagement, stability                                                                                                                                                                                               |
| Trauma-Informed Healthcare                                                | Longitudinal, integrated, survivor-centered care                                                                             | Higher program completion, retention                                                                                                                                                                                         |
| Multi-Disciplinary Teams (SEEN (Support to End Exploitation Now) Program) | Partnership between 30+ public and private agencies providing a coordinated response to at-risk and sexually exploited youth | Ensure victim's physical and psychological safety, access to resources and services, offender accountability through prosecution and addressing larger social issues impacting at-risk children through policy and education |

Effective trauma-informed models for youth trafficking victims center on safety, empowerment, and culturally responsive care. These models prioritize physical and emotional safety as defined by the youth, ensure clear communication, and foster environments of trust. Youth are empowered through active involvement in decision-making and supported at their own pace. Collaboration across disciplines including mental health, legal, and social services ensures coordinated, respectful care. Services are culturally and linguistically appropriate, integrating survivor input and focusing on strengths rather than deficits. Key practices include minimizing re-traumatization, offering individualized, holistic support, and providing long-term, trust-based relationships. Child-friendly environments and ongoing staff training are essential to sustaining trauma-informed care.

The most effective trauma-informed models for youth trafficking survivors in the US are those that are survivor-centered, multidisciplinary, and relationship-based. Evaluated models, such as Children's Advocacy Centers, system of care approaches, such as the Bill Wilson Center, youth peer mentorship programs, comprehensive case management, multidisciplinary team approach like the Support to End Exploitation Now (SEEN) Program, and trauma-informed healthcare clinics have demonstrated positive outcomes in safety, healing, and long-term resilience for young survivors.

#### **1.2.1.1 Improving Virginia's Current State**

Shared Hope International and the Institute for Justice & Advocacy issue State Report Cards for each state that focus on their efforts to combat child and youth sex trafficking. Below are some of the main points from Virginia's 2023 Report Card:

- Virginia's 2023 Grade and Tier: Virginia received an overall "F" grade and is in Tier III (bottom 10 scores) in the 2023 Report Card.
- State Highlights: Virginia raised its score by 6.5 points between 2021-2023. Key advancements include mandated child sex trafficking prevention education for high school students, training for child welfare workers, specialized child welfare responses



for non-perpetrator caregiver cases, and mandated victim restitution for child sex trafficking offenses.

- **Safe Harbor Status:** Despite recent legislation for a pilot program in one county, Virginia's state law still permits the arrest and prosecution of minors for prostitution offenses, meaning commercially sexually exploited children can be criminalized. There are also gaps in screening for at-risk children and providing community-based services and funding.

Opportunities exist to strengthen Virginia's approach to serving youth trafficking victims by expanding the use and adaptability of proven, trauma-informed evidence-based best practice models.



***First, expanding trauma-informed, survivor-centered care is essential*** to improving outcomes for children and youth impacted by trafficking across the Commonwealth. While Children's Advocacy Centers (CACs) offer valuable multidisciplinary, trauma-informed services in some regions, their availability remains inconsistent, particularly in rural or underserved communities. Scaling CAC coverage statewide, while ensuring all centers are adequately resourced and staffed, would provide equitable access to forensic interviews, mental health care, medical assessments, victim advocacy, and coordinated case management.

In addition to expanding CACs, Virginia should establish and sustain 24/7 mobile crisis response teams that are trained specifically in child trafficking and exploitation. These mobile units would offer immediate crisis stabilization, safety planning, and service linkage for trafficked youth, meeting them where they are, whether that be in emergency rooms, schools, shelters, or on the street. Embedding mobile teams across all regions, particularly in localities without CAC coverage, would ensure that no child falls through the cracks due to geography or resource gaps. When coordinated with local multidisciplinary teams (MDTs), these teams can significantly reduce delays in care and increase survivor engagement with supportive services.

***Second, improving how data is collected, shared, and used*** is critical to strengthening Virginia's systemic response to trafficking. Current data systems like VDSS's online automated services information system (OASIS), Virginia State Police's Records Management System (RMS), and frameworks like the Commonwealth Data Trust (CDT) provide a foundation, but broader agency participation and consistent, high-quality data entry are needed to realize their full potential. Ensuring that all relevant agencies, including child welfare, education, law enforcement, and local health departments, are properly trained and actively contributing to these systems will enhance the accuracy, timeliness, and utility of trafficking data across the state.

Strategic use of this data must be embedded within a continuous quality improvement (CQI) framework. This means regularly analyzing data to identify service gaps, track outcomes, and evaluate the effectiveness of prevention and intervention strategies. By using data not just for compliance, but as a dynamic tool for learning and decision-making, Virginia can create a

more responsive, accountable, and evidence-informed system. Ultimately, this approach supports smarter policy development, targeted resource allocation, and more effective programming that evolves alongside emerging needs and trends.

***Third, strengthening training for mandatory reporters is a foundational step*** toward earlier identification and more effective intervention for youth at risk of or experiencing trafficking. While current training requirements vary, mandating annual, standardized, trauma-informed training across sectors, especially for educators, healthcare providers, school resource officers, local health departments, and law enforcement, would ensure a more consistent and informed response statewide. These trainings should include practical guidance on recognizing risk factors, responding appropriately, understanding the intersectionality of support associated with human trafficking victims, and connecting youth to appropriate protections and decriminalized support.

Victims of trafficking often do not self-identify due to fear, manipulation, trauma, or mistrust of authorities. As a result, all levels for each of the mandated reporter disciplines should be properly trained to identify and respond to a victim of human trafficking. However, law enforcement plays a very critical role as they often interact with victims through the lens of an offender. Due to the victim often being forced to participate in criminal activities, human trafficking victims encounter law enforcement and are viewed as criminals. Proper training for law enforcement is essential for effectively identifying and responding to human trafficking. Without the appropriate knowledge and tools, officers may miss critical signs or inadvertently retraumatize victims.

Training ensures officers can recognize both sex and labor trafficking indicators, understand the dynamics of coercion and control, and apply legal frameworks effectively. A trauma-informed approach is equally vital. It fosters trust, reduces harm, and improves the chances of victim cooperation and recovery. By integrating trauma-informed care into policing practices, law enforcement can enhance victim safety, support prosecution efforts, and contribute to a coordinated, victim-centered response to human trafficking.

Additionally, school-based prevention efforts must be prioritized. All school staff including administrators, counselors, transportation personnel, and support staff should be equipped with trafficking identification and response training to create a whole-school safety net. For students, integrating age-appropriate human trafficking prevention curriculum into health and wellness education can build awareness, critical thinking, and personal agency. These efforts should also include trauma-informed messaging, culturally relevant materials, and collaboration with community partners, including survivor-led organizations. Through comprehensive, coordinated prevention education, schools can become both an early warning system and a protective space for vulnerable youth.

***Fourth, multi-agency collaboration must be significantly strengthened*** through the development and statewide adoption of formal, standardized multidisciplinary team (MDT) protocols. It is worth noting that effective July 2024, Section 15.2-1627.6 Code of Virginia requires that MDTs be established in every county or city in Virginia. These sexual assault and

human trafficking response teams are charged with focusing on protocols, policies, and community response guidelines. As a result of this law, several MDTs have been created while some are still in the developmental stage, but the delay in implementation is a major problem and will continue to undermine support capabilities and fuel disparities across the state if MDTs are not implemented and funded. These protocols should go beyond short-term crisis response and be intentionally designed to support long-term recovery and reintegration, particularly for youth survivors of human trafficking. Standardized MDT protocols would establish clearly defined roles, shared communication practices, and trauma-informed, culturally responsive approaches across all jurisdictions in Virginia.



To be most effective, these protocols should ensure that youth-specific services are embedded into every stage of the continuum of care including immediate safety planning, mental health and substance use treatment, legal advocacy, educational support, and long-term housing and workforce development. **As an example of an approach to strengthen and scale this collaborative model, Virginia could consider strategically expanding Child Advocacy Centers (CACs) as regional hubs for MDT operations.** CACs, accredited by the National Children's Alliance, integrate law enforcement, Child Protective Services (CPS), prosecution, medical, mental health, and advocacy partners under one roof to coordinate interviews, case reviews, and family services in a child-friendly environment. Establishing at least one CAC per region would create consistent access to comprehensive support statewide. While the cost and coordination effort would be significant, they can be mitigated by private braided funds and investments from health organizations like Valley Health Systems, Bon Secours, UVA and others and the potential benefits are broad and compounding: reduced trauma for all child victims and families, expedited and improved investigations and prosecutions, standardized practices and quality assurance, better access to ongoing services, strengthened prevention and early identification, enhanced local networks, and increased public confidence in child protection efforts.

To be most effective, these protocols and supporting CAC infrastructure should ensure youth-specific services are embedded into every stage of the continuum of care, including immediate safety planning, mental health and substance use treatment, legal advocacy, educational support, and long-term housing and workforce development. By coordinating efforts among child welfare agencies, law enforcement, schools, healthcare providers, legal advocates, and survivor-led organizations, Virginia can create a seamless, survivor-centered system that reduces re-traumatization and increases access to comprehensive, developmentally appropriate services. Ultimately, building a cohesive, state-supported MDT framework, anchored where possible by accredited CACs. This will not only promote accountability and equity across regions but also ensure that youth survivors, regardless of where they live in the Commonwealth, have consistent access to the holistic support they need to heal, reclaim their autonomy, and thrive long term. Integrating key data systems with state and local platforms (e.g., child welfare, education, law enforcement) would further improve victim identification, case tracking, and service coordination.

Finally, Virginia should ***actively consider adapting and scaling proven, evidence-based models from other jurisdictions*** that have demonstrated success in supporting youth survivors of human trafficking. Virginia's current safe harbor protections for youth trafficking survivors remain limited. While survivors can petition for vacatur in circuit court to expunge police and court records and overturn certain convictions, these remedies do not extend to all survival-related offenses, leaving many trafficked youth exposed to criminal penalties.

A significant gap exists in the non-criminalization of minors arrested for prostitution. Law enforcement continues to lack adequate training and guidance to consistently identify such youth as victims of trafficking. Although Virginia statute § 18.2-361.1 offers an affirmative defense, allowing minors charged with prostitution or related offenses to argue that their actions resulted from coercion, deception, or control by another individual, this framework still places the burden of proof on the victim.

While this statute may signal progress, it falls short of fully embracing Safe Harbor principles and federal TVPA guidance, which clearly state that ***any inducement of a minor into commercial sex constitutes trafficking, regardless of force, fraud, or coercion***. No evidentiary burden should be placed on minors to demonstrate their victimization.



One critical area of focus is the expansion of youth peer mentorship programs led by trained survivors. These programs not only provide credible, lived-experience support that fosters trust and support with youth, but also promote healing, empowerment, and long-term resilience. Survivor-led mentorship models can serve as a powerful tool in breaking cycles of exploitation, as mentors help youth navigate complex systems, build self-worth, and develop healthy, supportive relationships.

In tandem with peer-based interventions, Virginia should shift its statewide approach toward protective, non-punitive response models that treat trafficked youth as victims of crime, not perpetrators. This includes revising policies and protocols that may criminalize survival behaviors and instead promoting diversionary and trauma-informed pathways to safety, stability, and recovery. By embedding these approaches within a broader continuum of care, including mental health support, education re-engagement, safe housing, and family reunification or alternative placement options, Virginia can ensure that youth have access to comprehensive, developmentally appropriate services that support their long-term well-being.

Ultimately, scaling these best practices across the Commonwealth will require coordinated investment, cross-agency training, and strong partnerships with survivor-led organizations. By doing so, Virginia can become a national leader in building a responsive, compassionate, and effective system of care for youth impacted by trafficking, one that honors their dignity, supports their healing journey, and helps them thrive beyond their trauma.

## 1.2.2 DATA GAP ANALYSIS

Over the past seven years, Virginia has made significant strides in statewide data sharing through a series of legislative and operational milestones. The foundation was laid in 2018 with Chapter 679 of the Acts of Assembly, which created the Commonwealth's first Chief Data Officer (CDO) and established a permanent governance framework consisting of the Executive Data Board, Data Governance Council, and Data Stewards Group. This structure standardized data practices across agencies and institutions, enabling secure, multi-agency collaboration. Building on this framework, the General Assembly enacted Virginia Code § 2.2-203.2:4 in 2023, formally establishing the Commonwealth Data Trust (CDT), a legal mechanism to streamline and secure multi-party data exchange among state, local, and higher-education entities. In early 2025, the ODGA launched the CDT Portal, which transformed onboarding processes by automating membership agreements and reducing approval timelines from days to minutes. Most recently, House Bill 1632, signed into law in 2025 and effective July of that year, mandates Executive Branch agency participation in the CDT, ensuring broad adoption across state government.

Importantly, the CDT also provides a structured pathway for non-government organizations including nonprofits, service providers, and researchers, to share data with state agencies under uniform security and privacy agreements. While not yet trafficking-specific, this capability lays critical groundwork for integrating human trafficking service data into statewide dashboards and analytics, improving coordination and enabling a more complete understanding of survivor needs and risk trends across Virginia. Even with these gains, slow adoption and implementation, legacy systems, and lack resources are some of the issues allowing the following significant challenges to persist:



- **Underreporting:** Victim reluctance, lack of mandatory reporting, inconsistent use and/or lack of a proper human trafficking assessment tool, and local reporting gaps obscure the true scope of trafficking. In the current legacy OASIS system, data purging

can occur due to records retention policy or accidentally through human error. The software lacks duplicate entry validation, assigns new IDs to each case, and does not link cases to prior referrals; and the costs are not reasonable considering the age of the software to fully modernize the platform. As a result, critical information about a child’s history of abuse may be overlooked, increasing the risk of missing potential trafficking indicators. In addition, broader information and data sharing, where appropriate, available in State and local law enforcement records management systems (RMS) could improve the quality of tracking and service but is not currently shared.

- **Interoperability Challenges:** Fragmented systems and limited integration hinder comprehensive case tracking and service coordination. Beyond OASIS and Kin First, most systems in Table 2 operate in isolation, lacking workflows that streamline data entry or automate sharing across agencies. This results in fragmented records, manual reconciliation, and missed opportunities for timely, coordinated responses to trafficking cases. Addressing these interoperability gaps is critical to building a unified, survivor-centered data environment that supports case coordination, performance tracking, and informed policy decisions across the Commonwealth.
- **Data Quality and Consistency:** Variability in data entry and standards affects reliability. OASIS data entry is highly dependent on caseworkers and how they enter information in the system; and the visibility of HT related cases relies on the selected case types. Processes for each office, for example, how case types are selected and what information is entered, is inconsistent.
- **Lack of Centralized Case Registry:** CPS assessments and investigation results related to suspected or confirmed human trafficking instances are not entered into a central registry, which limits effective tracking and data integration, even if an interoperable system were to be implemented.

**Table 2: Virginia Data Systems with Data Relevant to Human Trafficking**

| System Name                                      | Purpose                                                                                                                                             | Data Collected                                                                                                                                  | Host Agency | Access                                                   | Data Refresh                     | Interoperability Notes                                                                                                           |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------------------------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| VAST (Virginia Analytics System for Trafficking) | Statewide trafficking analytics platform designed to aggregate and visualize data from multiple agencies (law enforcement, CPS, victim services) to | Incidents, demographics , risk factors, trafficking venue, victim–offender relationship, geographic distribution, missing/recovered child data. | DCJS        | Law enforcement, service providers, and select agencies. | Not Applicable – System retired. | Intended to integrate with multiple data sources; lacked long-term funding and governance, which contributed to discontinuation. |

| System Name                                          | Purpose                                                                                                                                                    | Data Collected                                                                                                                                 | Host Agency | Access                                              | Data Refresh                                              | Interoperability Notes                                                                                                                     |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
|                                                      | identify trends, hotspots, and service gaps.                                                                                                               |                                                                                                                                                |             |                                                     |                                                           |                                                                                                                                            |
| VSDCS (Victims Services Data Collection System)      | Manages victim services data and tracks VOCA grant compliance; supports monitoring of trafficking-related service delivery across Virginia.                | Victim intake data, service types provided (e.g., shelter, counseling, advocacy), demographics, referral sources, and grant reporting metrics. | DCJS        | Accessible to VOCA grant recipients and DCJS staff. | Quarterly reporting.                                      | Not fully integrated with law enforcement or child welfare platforms; primarily functions as a grant compliance and service tracking tool. |
| OASIS (Online Automated Services Information System) | Legacy CPS case management platform used to track investigations, assessments, and service plans for children, including those impacted by trafficking.    | CPS case records, screening outcomes, investigation findings, referrals, and service linkages.                                                 | VDSS        | Accessible to CPS caseworkers and local DSS staff.  | Data refreshed in real-time as caseworkers enter updates. | Limited interoperability; high risk of duplicate entries and incomplete linkage to prior cases; being phased out in favor of CCWIS.        |
| COMPASS (CCWIS platform)                             | Next-generation child welfare system in development to replace OASIS; designed to be federally compliant and fully interoperable with other state systems. | Child welfare case data including trafficking screenings, safety assessments, service plans, placement records, and longitudinal outcomes.     | VDSS        | CPS caseworkers and local DSS staff.                | Not Applicable – In development.                          | Will support integration with CDT and other statewide platforms (e.g., Kin First Now, VSDCS).                                              |



| System Name                                   | Purpose                                                                                                                                                                                                               | Data Collected                                                                                                                | Host Agency                                                             | Access                                                                            | Data Refresh                                        | Interoperability Notes                                                                                                                                                                           |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Kin First Now                                 | Tracks and visualizes kinship care placements and related child welfare data to support decision-making and permanency planning for youth in out-of-home care, including those at risk of or impacted by trafficking. | Kinship placement status, caregiver demographics, case milestones, permanency outcomes, and associated child welfare metrics. | VDSS                                                                    | Authorized VDSS staff, local DSS offices, and designated child welfare personnel. | Data is refreshed daily.                            | Currently operates as a standalone Power BI dashboard; potential for integration with CCWIS to streamline data sharing and enhance reporting across child welfare and trafficking-related cases. |
| LEDRS (Law Enforcement Data Reporting System) | Tracks law enforcement incident, arrest, and prosecution data statewide, including trafficking-related offenses.                                                                                                      | Offense reports, arrest data, suspect and victim demographics, location data, and court disposition details.                  | Virginia State Police                                                   | Law enforcement agencies and VSP analysts.                                        | Updated continuously as local agencies submit data. | Can feed into statewide analysis platforms and support multidisciplinary task force reporting.                                                                                                   |
| LinkB5                                        | Early childhood integrated data system supporting child development and care quality; not trafficking-specific but includes indicators relevant to at-risk youth populations.                                         | Enrollment data, family demographics, developmental screenings, and service participation for early childhood programs.       | Virginia Early Childhood Foundation (in partnership with VDOE and VDSS) | Participating early childhood programs and state partners.                        | Periodic (quarterly) updates.                       | Potential to link with CCWIS for prevention efforts (early identification of at-risk children).                                                                                                  |

| System Name          | Purpose                                                                                                                                                 | Data Collected                                                                                  | Host Agency                                  | Access                                    | Data Refresh                 | Interoperability Notes                                                                                |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------------------|-------------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------|
| DCSE / CGI Transcend | Child support enforcement and related family data system; not trafficking-specific but may capture contextual family data relevant to risk assessments. | Child support orders, payment history, parental demographics , and related enforcement actions. | Division of Child Support Enforcement (VDSS) | DCSE staff and authorized state partners. | Ongoing operational updates. | Limited direct use for trafficking cases but may complement child welfare case data in risk analyses. |

*Note: This is not a comprehensive list of systems and databases but represents the initial scope of systems identified during this early assessment to develop this plan.*

In addition to the state-managed systems listed above, service providers and community organizations across Virginia maintain their own data sets that, when appropriately anonymized or de-identified, can enrich statewide understanding of human trafficking trends and outcomes. Leveraging these data sources, without sharing personally identifiable information, can improve tracking of services, highlight performance metrics, and reveal systemic gaps and pain points that inform targeted solutions. Examples of Virginia-based organizations with relevant human trafficking data include Safe House Project (survivor housing and referrals), Samaritan House (emergency shelter and wraparound services), and Just Ask Prevention (prevention education and awareness initiatives). While national organizations such as Polaris (National Human Trafficking Hotline data) and Atlas Free (shelter certification program and survivor-centered housing standards) also provide valuable insights, initial efforts should focus on collaborating with in-state partners to build a more complete and actionable data picture before integrating broader national data sources.

Persistent underreporting, limited interoperability with other state and local data systems, and challenges in data quality and access continue to hinder a fully comprehensive, real-time statewide response. Addressing the identified data gaps, particularly modernizing legacy systems like OASIS and implementing CCWIS, requires ongoing and intentional investment in cross-agency collaboration, standardized reporting, and secure, privacy-conscious data sharing frameworks; as well as sustained, blended funding. Federal Title IVE and CAPTA allocations can support core development and integration, while VOCA funds and state appropriations may underwrite cross-agency data-sharing initiatives through the Commonwealth Data Trust. Public-private partnerships can also offset costs for advanced analytics and user training. Detailed funding actions are in **Section 1.2.5.4**.

### 1.2.2.1 Data Recommendations

Our research and analysis highlighted several recommendations for consideration to improve the impact of support provided youth victims of human trafficking.

#### Formalize and Expand Cross-Agency Data Sharing and Case Coordination



**Action:** Leverage Virginia’s new [Commonwealth Data Trust](#) (CDT) and recent legislative mandates to rapidly onboard all relevant state and local agencies, including law enforcement, child welfare, local school systems, behavioral health and local health departments, and victim services, into a unified, secure, and legally compliant data-sharing framework. Develop and implement standardized agreements and protocols to facilitate real-time exchange of information, integrated case management, and coordinated service delivery. These efforts should be seamlessly aligned with existing platforms and requirements for any new or modernized systems within the state, such as OASIS (soon to be Comprehensive Child Welfare Information System or “CCWIS”), Victims Services Data Collection System (VSDCS), and others. The CDT is a secure, multi-stakeholder data exchange and analytics platform established under Virginia Code § 2.2-203.2:4 (2023). It enables data sharing under uniform security, privacy, and confidentiality rules among state, regional, local agencies, and higher education institutions; and is managed by the Office of Data Governance and Analytics (ODGA). Data Trust Members include agencies such as Virginia Department of Health, Social Services, Corrections, local police departments, and higher education institutions, who collectively sign Data Trust Agreements and agree to governance participation. CDT serves as a solid foundational element to underpin a statewide centralized system by providing a pathway to eliminate multiple ad-hoc data-sharing pipelines by providing a single, standardized environment, reducing technical complexity and costs via NIEM-based protocols (shared language and rulebook). ODGA launched the Commonwealth Data Trust Portal. Agencies can use the portal to join the Data Trust, view and manage agreements, and request access to datasets via Role-Based Access with Okta, a secure access management, two-factor authentication protocol, at no cost to participants.

**Why It Matters:** This initiative will break down long-standing data silos, enabling faster, more consistent, and coordinated responses across systems. It strengthens Virginia’s ability to identify trafficking cases early, ensure appropriate referrals, and provide holistic, trauma-informed care. Enhanced data integration also supports Child Abuse Prevention and Treatment Act (CAPTA) compliance, aligns with recent state legislation requiring multidisciplinary collaboration, and ensures that no survivor falls through the cracks due to fragmented information systems.

**Sustainability:** A robust, standardized data infrastructure empowers the Commonwealth to drive ongoing system evaluation, monitor service outcomes, and make data-informed decisions around resource allocation and policy development. Embedding these practices supports continuous quality improvement, enhances interagency accountability, and

positions Virginia as a national leader in coordinated, survivor-centered responses to human trafficking.

### **Standardize Data Elements and Reporting Protocols**

**Action:** Establish and implement a standardized set of data fields, definitions, and reporting protocols for all human trafficking cases and related service responses across agencies, leveraging CDT portal to facilitate agreements.



**Why it Matters:** Consistent data standards, field types, and definitions are essential to improving the quality, accuracy, and interoperability of information collected across systems. Standardization enables agencies to “speak the same language,” allowing for more effective data comparison, aggregation, and analysis. This condition is expected to have contributed to some of the complications that resulted in the discontinuation of the VAST platform; and would be an impediment to future efforts to aggregate data and information related to human trafficking in the long term. The potential value and return on investment for this action not only benefits human trafficking improvements but could improve awareness and capacity for many related needs across the state; and facilitates the identification of service gaps, supports evidence-based policy development, and creates the ability to enhance coordination with national data systems. Ultimately, it strengthens Virginia’s ability to respond strategically and cohesively to human trafficking across the continuum of care.

**Sustainability:** Long-term sustainability of standardized data elements and reporting protocols will require embedding these standards into statewide data governance frameworks and operational policies across child welfare, law enforcement, and victim services agencies. The Statewide Human Trafficking Commission, under the Virginia Department of Criminal Justice Services (DCJS) administrative leadership, should oversee ongoing updates to standards as federal reporting requirements, trafficking trends, and technology platforms evolve. Integration with core systems such as CCWIS, VSDCS, and Kin First Now will ensure consistency across data collection points and reduce duplication of effort.

To maintain compliance and usability over time, standardized elements should be incorporated into training for frontline staff and tied to funding or grant reporting requirements where possible, incentivizing consistent adoption. A periodic review cycle, aligned to Virginia’s biennial budget process or every three to five years, should assess whether elements remain relevant, identify gaps (e.g., emerging trafficking typologies), and incorporate survivor and frontline feedback. This approach supports a living standard that evolves with statewide priorities and ensures that investments in interoperability and reporting yield lasting benefits for both service providers and policymakers.

### **Continue Funding for the Development, Implementation, & Sustainment of CCWIS**

Virginia is in the process of replacing its aging OASIS platform with the Comprehensive Child Welfare Information System (CCWIS), a modernized, federally compliant solution designed to improve case management, data integration, and service coordination for child welfare

programs. This transition is critical for addressing long-standing gaps in data quality, interoperability, and real-time reporting that currently hinder the Commonwealth's ability to identify and respond effectively to human trafficking cases. By fully funding and sustaining CCWIS beyond its initial development, Virginia can ensure that the system not only meets federal compliance requirements but also supports a unified, survivor-centered approach across child welfare, law enforcement, education, and health sectors. Sustained investment will allow for continuous enhancements, statewide training, and alignment with evolving best practices in trauma-informed and youth-focused care.

**Action:** Secure and prioritize multi-year funding to complete the development and statewide rollout of CCWIS, including system integration with related data platforms (e.g., VSDCS, LEDRS, Kin First Now, and the Commonwealth Data Trust). Allocate resources for ongoing system maintenance, user training, and continuous upgrades to support emerging legislative requirements, enhanced reporting capabilities, and interoperability with national anti-trafficking data systems. Establish a dedicated governance structure within VDSS to oversee implementation, ensure stakeholder engagement, and coordinate periodic system evaluations for quality improvement.



**Why it Matters:** Continuing investment in CCWIS ensures Virginia can retire legacy systems that currently impede data sharing and comprehensive case tracking for trafficked youth. A fully functional CCWIS will provide a single, reliable source of truth for child welfare data, reduce reporting errors, and enable real-time coordination among agencies. This modernization is essential for early identification of trafficking victims, closing service gaps, and improving outcomes by linking survivors to the right supports at the right time. Moreover, CCWIS will strengthen Virginia's compliance with federal mandates, position the Commonwealth to leverage additional federal funding, and build a sustainable infrastructure that adapts to evolving best practices in child protection and anti-trafficking work.

**Sustainability:** Sustainability for CCWIS requires both financial and operational planning to ensure the system remains effective beyond its initial implementation. Virginia should establish a dedicated funding line within the state budget that supports ongoing maintenance, user training, and future enhancements tied to policy changes and emerging best practices. Leveraging braided funding streams, including federal Title IV-E funds, CAPTA allocations, and potential public-private partnerships, will reduce reliance on one-time appropriations and provide flexibility to address evolving system needs. Incorporating continuous quality improvement (CQI) processes will ensure CCWIS remains aligned with frontline realities and survivor-centered approaches, while periodic evaluations and stakeholder feedback loops will maintain system relevance and performance over time.

### **Conduct Comprehensive Review of Data Systems and Sources**

While this strategic plan identifies key data gaps and opportunities for integration, further work is needed to fully understand the breadth and functionality of all systems and databases across state agencies and non-state partners that contain human trafficking-related information. A comprehensive review would ensure Virginia captures the full

spectrum of available data, evaluates data quality and interoperability, and identifies opportunities to streamline or modernize platforms to support a coordinated statewide response. This assessment is essential for developing a holistic understanding of the data landscape and ensuring that future investments in data modernization, such as CCWIS and VSDCS enhancements, are effectively targeted and aligned with statewide priorities.

**Action:** Initiate a structured review of all data systems and sources that contain human trafficking-related data across state agencies (e.g., VDSS, DCJS, VDOE, VSP, DBHDS) and relevant non-state organizations (e.g., nonprofits, advocacy networks, national hotlines). The review should map current data flows, identify overlaps and gaps, and evaluate opportunities for integration or modernization in alignment with future CCWIS and VSDCS capabilities. Deliverables should include a comprehensive data inventory, recommendations for standardized data elements, and prioritized opportunities for cross-agency interoperability.

**Why it Matters:** A thorough understanding of the current data ecosystem is foundational to improving case coordination, measuring statewide outcomes, and informing resource allocation. By identifying all relevant data sources, both within and outside of government, Virginia can create a more accurate, survivor-centered picture of human trafficking trends and service needs. This effort will also inform policy and funding decisions, ensuring investments in data modernization (e.g., CCWIS) are targeted and avoid redundancy.

**Sustainability:** A comprehensive review of Virginia's data systems and sources with relevant human trafficking data should be institutionalized as an ongoing function of the Statewide Human Trafficking Commission rather than a one-time activity. Establishing a central data inventory maintained by DCJS and updated annually will ensure the state can rapidly identify new data sources and assess integration opportunities as programs evolve. Reviews should be embedded into biennial strategic planning cycles and incorporate survivor and community partner input to keep findings relevant and actionable. This living data inventory will reduce redundancy, highlight emerging trends, and inform funding decisions for modernization efforts over time. Leverage braided funding (VOCA, Title IV-E, CAPTA) and existing interagency data initiatives to minimize costs and maintain alignment with Virginia's enterprise data strategy.

### **Integrate State Systems with National and Cross-Sector Platforms**

**Action:** Develop and implement the necessary technical and legal infrastructure to integrate future aggregated data sets from state systems with key national data sources including the National Human Trafficking Hotline, Human Trafficking Reporting System (HTRS), and the National Center for Missing & Exploited Children (NCMEC), as well as relevant state-level systems such as child welfare and healthcare databases.

**Why it Matters:** Seamless data integration will empower Virginia to benchmark its performance against national trends, contribute to broader analyses, and more effectively track victims and cases across state lines. This interoperability strengthens cross-jurisdictional coordination, enhances real-time decision-making, and increases access to

critical federal resources. By aligning with national systems, Virginia positions itself as a leader in evidence-based, data-driven responses to human trafficking.

**Sustainability:** Long-term sustainability for integrating Virginia’s state systems with national and cross-sector platforms hinges on building this work into the second phase of the SCS and Commission’s operations, after internal state data alignment has been achieved. Leveraging existing enterprise frameworks such as the Commonwealth Data Trust (CDT) will minimize the need for new infrastructure while ensuring compliance with statewide privacy and security standards.

Ongoing governance by the Commission should include a standing data integration subcommittee responsible for maintaining technical and legal agreements, ensuring interoperability with evolving national platforms like the National Human Trafficking Hotline, HTRS, and NCMEC. Integration should follow a **phased approach**—initially prioritizing de-identified or aggregate data exchanges to support benchmarking and trend analysis, then expanding to real-time case coordination where permitted. Sustained value will depend on periodic CQI reviews to confirm that these national linkages improve cross-jurisdictional awareness, enhance victim identification, and justify resource commitments over time.

### **Establish a Continuous Quality Improvement (CQI) Program**

**Action:** Launch a comprehensive statewide Continuous Quality Improvement (CQI) initiative to routinely audit data quality, ensure adherence to reporting standards, and deliver standardized, ongoing training for all data contributors and mandatory reporters.

**Why it Matters:** Effective cross-agency collaboration and meaningful system improvements require high-quality, consistent, and ethically collected data. A robust CQI framework ensures that data remains accurate, actionable, and responsive to emerging trends. Regular audits and training create a culture of accountability and learning—equipping the workforce with the knowledge and tools to collect, interpret, and use data responsibly. These efforts will close information gaps, reduce reporting inconsistencies, and ensure compliance with evolving standards.

**Sustainability:** For long-term success, the Continuous Quality Improvement (CQI) program should be embedded within the Statewide Centralized System (SCS) and overseen by the Human Trafficking Commission under DCJS’s administrative leadership. Rather than building new structures from scratch, Virginia should leverage existing statewide data frameworks and governance efforts, such as the Commonwealth Data Trust (CDT) and related cross-agency data initiatives, to streamline implementation, reduce duplication, and ensure alignment with broader enterprise data strategies.

CQI processes should include regular analysis of system performance, case outcomes, and service gaps, drawing from both state-managed systems (e.g., CCWIS, VSDCS, Kin First Now) and de-identified partner data from nonprofits and local agencies. Findings from these reviews should feed directly into quarterly Commission reports and biennial budget planning cycles, allowing for targeted policy and programmatic adjustments in real time. Incorporating survivor and frontline feedback into this cycle will ensure continuous improvements remain



trauma-informed and relevant to lived experiences, while the use of existing frameworks like CDT will support sustainable interoperability and long-term data integrity without requiring significant new infrastructure investments.

### 1.2.3 TRAINING FOR MANDATORY REPORTERS

Virginia law (Code of Virginia § 63.2-1509) specifies a broad list of professionals required to report suspected child abuse and neglect, including teachers, healthcare providers, social workers, law enforcement, childcare providers, and others who regularly interact with children. Mandated reporters must report any suspicion of child abuse or neglect encountered in their professional capacity. This includes suspected human trafficking of minors, which is classified as child abuse under both state and federal law. Virginia law does **not** currently require mandatory reporters to complete periodic or recurring training on recognizing and reporting child abuse and neglect. The statutes reviewed do not specify a required frequency or renewal period for such training; and although there are training resources available, they are inconsistently accessed and vary in content.

#### 1.2.3.1 *Available Training Resources*

Virginia stakeholders who engage with victims and survivors of human trafficking, including youth, have access to a range of specialized training resources through both state and federal platforms. The Virginia Department of Criminal Justice Services (DCJS) offers a centralized training portal for law enforcement, service providers, healthcare professionals, colleges and universities, criminal justice and first responder professionals, and hotel staff, with options for in-person, virtual, and on-demand learning. Key offerings include scenario-based training for first responders, advanced investigation and prosecution modules, and trauma-informed curricula like Sexual Exploitation Treatment and Training Services (SETTS) for youth-serving

professionals. To further strengthen trauma-informed practices across disciplines, the Virginia Sexual Assault Kit Initiative (SAKI) team offers a free, customizable training in Trauma-Informed Sexual Assault Investigations. Based on IACP-endorsed curriculum and approved by DCJS and the Virginia State Bar, this training supports victim-centered, offender-focused investigations and is available to law enforcement, attorneys, social workers, victim advocates, forensic nurses, and other allied professionals statewide. Federally, resources such as the Stop, Observe, Ask, and Respond (SOAR, developed by the U.S. Department of Health & Human Services) to Human Trafficking Training Program, Office for Victims of Crime Training and Technical Assistance Center (OVC's TTAC) platform, Office of Juvenile Justice and Delinquency Prevention (OJJDP) trainings, and National Human Trafficking Training and Technical Assistance Center's (NHTTAC's) survivor-informed offerings provide multidisciplinary education and technical assistance tailored to the complex dynamics of human trafficking and victim response.

The VDSS offers a range of training resources, including online modules and profession-specific programs (e.g., for educators), accessible via the VDSS website. These trainings cover:

- Legal definitions and responsibilities
- Indicators of abuse and neglect (including trafficking)
- Procedures for making a report
- What to expect after a report is made

Some localities, such as Fairfax County, provide in-person or virtual training sessions tailored to local agencies and organizations. These sessions often include interactive components, real-life scenarios, and Q&A opportunities to enhance understanding and application of reporting duties. In addition, there are many training resources offered by several notable non-profit and community organizations in Virginia, as listed in **Table 3**.

**Table 3: Non-Profit Training Providers**

| Organization                  | Platform/Program          | Focus Area(s)                                                            |
|-------------------------------|---------------------------|--------------------------------------------------------------------------|
| Freekind                      | Prevention Project™       | Youth, schools, survivor-informed                                        |
| ImPACT Virginia               | Online/in-person training | Healthcare, education, public                                            |
| Just ASK                      | Prevention Project        | Youth, parents, schools                                                  |
| Freedom 4/24                  | Prevention courses        | Youth, parents, professionals                                            |
| Central VA Justice Initiative | Awareness workshops       | Community, youth groups                                                  |
| Safe House Project            | National training modules | Professionals, community                                                 |
| Trauma & Hope                 | SETTS course              | Providers, trauma-informed care                                          |
| Street Ransom                 | Mentoring, training       | Youth agencies, volunteers                                               |
| Samaritan House               | In-person trainings       | Youth, schools, religious organizations, businesses and community groups |

However, while many stakeholders within Virginia’s ecosystem offer training resources providing a strong foundation for human trafficking response, significant drawbacks remain in terms of accessibility, consistency, depth, and measurable impact.

A specific example is H.O.P.E. Training by Safe House Project. The Healthcare Observations for the Prevention & Eradication of Human Trafficking (H.O.P.E.) training is a nationally recognized, survivor-informed curriculum developed by Safe House Project to equip healthcare professionals with the knowledge and tools necessary to identify and respond to human trafficking. H.O.P.E. is designed for frontline providers such as clinicians, pediatricians, and academic healthcare educators, and embodies a trauma-informed, patient-centered methodology that is informed by authentic survivor experiences. Currently, CE credits from H.O.P.E. training are recognized in multiple state jurisdictions including Texas, California, Florida, and New York; expanding to additional states through Safe House Project’s national healthcare partnerships.

Virginia’s mandatory reporter training on human trafficking is hindered by several critical gaps. Access to training is inconsistent across agencies and regions, with no standardized curriculum to ensure uniform content or delivery. Existing programs often lack sufficient focus on key elements such as youth behavioral cues, trauma indicators, and trafficking-specific scenarios. Additionally, the state does not have a centralized system for quality assurance or requirements for recurring, ongoing training, resulting in uneven preparedness among frontline professionals. **Table 4** summarizes gaps in the training offerings for Virginia Mandatory reporters.

**Table 4: Summary of Training Gaps**

| Area                      | Gap Description                                                                          |
|---------------------------|------------------------------------------------------------------------------------------|
| Youth Behavioral Cues     | Limited depth, lack of developmental context, few real-life examples                     |
| Trauma Indicators         | Surface-level coverage, minimal focus on complex trauma, lack of scenario-based learning |
| Standardization           | Inconsistent content and delivery across localities, no recurring requirement            |
| Trafficking-Specific Cues | Brief coverage, little on unique indicators or cultural/contextual factors               |
| Trauma-Informed Response  | Rarely addressed, little on minimizing re-traumatization or supporting disclosure        |

### 1.2.3.2 Alignment with Best Practices

Best practices recommend recurring, interactive, and scenario-based training that covers a wide range of behavioral and trauma indicators, is tailored to youth developmental stages, and includes guidance on trauma-informed and cultural informed response. Virginia’s current approach is not fully aligned with these standards, particularly in the areas of depth, interactivity, and standardization.

Virginia's mandated reporter training provides a foundation for recognizing child abuse and neglect but falls short in preparing professionals to identify and respond to the complex behavioral cues and trauma indicators seen in youth, especially those affected by trafficking. Addressing these gaps will require more comprehensive, interactive, and standardized training content that emphasizes developmental, trauma-informed, and culturally responsive approaches.

Expanding and standardizing trauma-informed training for mandatory reporters will require both state and federal investment. CAPTA funding and VOCA grants can be leveraged for curriculum development, train-the-trainer programs, and recurring quality improvement efforts. Braided State Workforce development funds may support scaling to rural and underserved areas. Funding implementation and sustainability pathways are described in **Section 1.2.5.4**.

### **1.2.3.3 Training Recommendations**

Virginia's mandatory reporter training framework represents one of the most critical opportunities to improve early identification and intervention for children and youth impacted by human trafficking. Current training efforts delivered by agencies such as the Department of Criminal Justice Services (DCJS), and supported by non-profit partners including Safe Harbor, Samaritan House, Safe House Project, and Just Ask Prevention, offer a strong starting point but are limited by fragmentation, inconsistent content, and uneven accessibility across regions. Federal guidance, such as the SOAR to Health and Wellness Training from the U.S. Department of Health & Human Services and best practices from the Office for Victims of Crime (OVC), underscore that training must be recurring, interactive, and trauma-informed, with clear attention to youth developmental stages and culturally responsive practices. Incorporating survivor-informed content is equally essential, ensuring professionals not only recognize trafficking indicators but also respond in ways that reduce re-traumatization, prioritize safety, and connect youth to appropriate support systems.



As Virginia expands the scope of mandated reporters and strengthens multidisciplinary team (MDT) responses, there is a critical need to **standardize training statewide** and **align it with national best practices**. The recommendations that follow outline strategies to build a sustainable, high-quality training infrastructure that can be scaled across diverse settings such as schools, healthcare systems, law enforcement, local health departments, and child welfare agencies. These strategies include adopting proven frameworks like SOAR, implementing train-the-trainer models to expand reach, and integrating continuous quality improvement (CQI) processes to monitor impact and adapt content over time. Collectively, these measures will ensure all professionals, regardless of geography or discipline, share a common understanding of trafficking dynamics, are equipped to act consistently and appropriately, and contribute to a coordinated, survivor-centered response across the Commonwealth.

**Virginia Department of Criminal Justice Services – Human Trafficking Education, Training and Awareness**

The Virginia Department of Criminal Justice Services (DCJS) has created and continues to facilitate several comprehensive human trafficking training programs administered both via E-Learning and In-person to include the following:

- E-Learning Courses:
  - Human Trafficking 101
  - Human Trafficking Awareness Training for Hotels
  - Human Trafficking Awareness Training for Colleges
- In-Person Courses:
  - Human Trafficking Identification for Criminal Justice and First Responders
  - Human Trafficking Investigation and Prosecution
  - SETTS: Sexual Exploitation Treatment and Training Services

While trainings can be facilitated both virtually and/or in-person, the sheer volume of trainings that would need to occur to ensure all mandated reporters, non-mandated providers, community members and youth in the state of Virginia are fully trained, exceeds what the DCJS training team could support. As a result, key recommendations include the following:

- Expand the DCJS training team – provide funding for one (1) additional staff person to address the human trafficking training needs of the state of Virginia
- Develop a Train-the-Trainer program – a train-the-trainer program could streamline the training process and increase the number of mandated reporters and non-mandated providers that need to receive human trafficking training to ensure victims (both youth and adults) can be properly identified and connected with immediate and long-term services and resources. Human Trafficking Regional Coordinators would participate in the DCJS Train-the-Trainer program to then provide approved trainings in their region of the state.
  - Human Trafficking Regional Coordinators would be identified to ensure the entire state is covered. Their tasks would include not only connecting victims and survivors with services and resources in their region of the state but also facilitate various levels of human trafficking trainings for providers and community members.
  - To ensure the successful implementation of this initiative the following components must be identified and regulated by the DCJS training team:
    - Identify the skills, knowledge, and competencies required of trainers
    - Set clear, measurable goals for what trainers should know and be able to do; align objectives with organizational goals and learner needs
    - Develop structured modules or topics for trainer instruction

- Create trainer manuals, participant guides, slide decks, and handouts
- Prepare evaluation tools (pre/post tests to measure knowledge gains)
- Outline expectations for trainer performance
- Prepare trainer performance assessments during and after the program
- Provide refresher trainings or booster sessions for trainers
- Budget and resource allocation

### **SOAR to Health and Wellness Training Framework**

The SOAR (Stop, Observe, Ask, Respond) framework is a nationally recognized, trauma-informed, and culturally responsive training program developed by the U.S. Department of Health and Human Services. It is designed for professionals across health care, behavioral health, public health, education, and social services, sectors that frequently encounter trafficking victims, especially youth. Key features include:

- **Trauma-Informed and Survivor-Centered:** Emphasizes understanding trauma, minimizing re-traumatization, and empowering survivors.
- **Cross-Sector Applicability:** Modules are tailored for health care, behavioral health, education, and social service professionals, making it ideal for Virginia's multidisciplinary response needs.
- **Cultural and Linguistic Responsiveness:** Training is available in English and Spanish and addresses the needs of diverse populations.
- **Flexible Delivery:** Offers in-person, virtual, and on-demand options, supporting both urban and rural implementation.
- **Evidence-Based Content:** Covers identification of trafficking indicators, trauma responses, reporting protocols, and resource navigation.
- **Alignment with Best Practices:** Incorporates scenario-based learning, case studies, and practical tools for real-world application.

### **Why Appropriate for Virginia:**

- **Scalable and Customizable:** Can be adopted statewide and adapted to local contexts, including integration with Virginia's existing Department of Social Services and Department of Education training resources.
- **Supports Mandated Reporter Training:** Addresses current gaps in recognizing youth behavioral cues and trauma indicators.
- **Politically Feasible:** Already recognized by federal agencies and compatible with Virginia's current legal and policy environment.

### **Statewide Multidisciplinary Learning Collaborative Model**

This model builds upon the proven **Community-Based Learning Collaborative (CBLC)** approach, which has successfully advanced the large-scale implementation of trauma-informed practices in other states. It convenes professionals from child welfare, law enforcement, education, healthcare, and community organizations to engage in shared, ongoing training and quality improvement initiatives. The goal is to foster a unified, trauma-informed response across systems through the following components:

- **Cross-Agency, Multidisciplinary Training:** Regular joint sessions for mandated reporters and frontline staff to build a shared understanding of human trafficking dynamics, strengthen collaboration, and break down silos between agencies.
- **Trauma-Informed Core Curriculum:** Utilizes evidence-based tools such as the NCTSN Child Welfare Trauma Training Toolkit and foundational TF-CBT modules, with a specific focus on recognizing youth-specific trauma, behavioral indicators, and red flags for trafficking.
- **Interactive, Scenario-Based Learning:** Reinforces practical skills through real-world case studies, peer learning, and role-playing exercises, helping participants apply knowledge with confidence in high-stakes situations.
- **Continuous Quality Improvement:** Integrates follow-up coaching, peer consultation, and ongoing performance monitoring to ensure that best practices are sustained, refined, and responsive to emerging needs.
- **Statewide System Integration:** Designed for alignment and coordination with Virginia's Department of Criminal Justice Services, Department of Social Services, and local multidisciplinary teams to support long-term scalability and system-wide consistency.

Together, these elements create a powerful, scalable framework to equip Virginia's workforce with the tools, language, and shared vision necessary to effectively prevent, identify, and respond to human trafficking.

#### **Why This Model Is Well-Suited for Virginia:**

- **Addresses Regional Disparities:** Promotes equitable access to trauma-informed training by facilitating knowledge-sharing and capacity-building in rural, underserved, and resource-constrained areas across the Commonwealth.
- **Supports Policy and Practice Alignment:** Establishes consistent standards, language, and protocols across systems, helping to close existing gaps in training content, delivery, and interagency coordination.
- **Builds on Existing Infrastructure:** Leverages Virginia's mandated multidisciplinary response teams and aligns with ongoing statewide efforts to standardize protocols, enhance interagency collaboration, and strengthen trauma-informed systems of care.

#### **Implementation Considerations:**



- **Mandate and Incentivize Participation:** Require annual or biennial completion of training for all mandated reporters and frontline personnel. Offer incentives or recognition for agencies demonstrating high rates of participation and compliance.
- **Embed Within Existing Systems:** Integrate training frameworks into onboarding processes, professional development plans, and continuing education requirements for sectors such as child welfare, education, law enforcement, and healthcare.
- **Evaluate and Evolve:** Utilize data from Virginia’s data systems to track training outcomes, assess impact, and refine content based on emerging trends, field feedback, and evolving best practices.

**Table 5: Framework Comparison**

| Framework                                | Core Strengths                                   | Virginia-Specific Benefits                        |
|------------------------------------------|--------------------------------------------------|---------------------------------------------------|
| SOAR to Health and Wellness              | Nationally recognized, trauma-informed, flexible | Scalable, cross-sector, addresses training gaps   |
| Multidisciplinary Learning Collaborative | Interactive, cross-agency, ongoing improvement   | Builds collaboration, standardizes best practices |

## Develop a Statewide Training Framework for Virginia Human Trafficking Response



**Action:** Establish a hybrid statewide training framework that integrates the nationally recognized SOAR to Health and Wellness model with a multidisciplinary learning collaborative approach tailored to Virginia’s needs. This framework should provide consistent, trauma-informed, and survivor-centered training for all mandated reporters and frontline professionals, including educators, healthcare providers, law enforcement, child welfare staff, and allied community members. Training should be delivered through a hybrid model (in-person, virtual, and on-demand), incorporate scenario-based learning, and be informed by survivor perspectives.

To ensure scalability, the framework should include a train-the-trainer program that equips regional coordinators and local partners (including nonprofits such as Safe Harbor, Samaritan House, and Safe House Project) to deliver approved content, expanding reach across urban and rural areas while maintaining fidelity to state standards. This framework must explicitly include the Virginia Department of Education (VDOE) and local school systems in curriculum design and delivery, ensuring that teachers, counselors, nurses, and administrators receive targeted training aligned with their mandated reporting responsibilities and roles in multidisciplinary teams (MDTs).

**Why it Matters:** Creating a standardized statewide training framework ensures all professionals, across child welfare, healthcare, law enforcement, and education, share a common understanding of human trafficking indicators, reporting obligations, and trauma-informed response practices. While Virginia has made progress in training frontline staff, education stakeholders remain a critical but underutilized resource in prevention and early intervention efforts.

Local school systems are uniquely positioned to identify and respond to trafficking because they maintain daily contact with children and adolescents, often recognizing changes in behavior, attendance, or academic performance that may indicate exploitation. Teachers, counselors, nurses, and administrators are mandated reporters under Virginia law, yet many lack access to comprehensive training on trafficking indicators, proper reporting protocols, and trauma-informed engagement. Without this foundation, opportunities for early identification and support may be missed.

Integrating education personnel into the statewide training framework will also strengthen **multi-disciplinary response teams (MDTs)** by ensuring schools contribute critical insight into a child's academic, social, and emotional context. This coordinated approach enables more holistic interventions, supports continuity in education, and connects vulnerable students to services without disruption to their academic trajectory. Prioritizing training for educators will not only improve reporting accuracy but also embed trafficking prevention and response into **everyday school practices**, amplifying statewide capacity to protect at-risk youth.

**Sustainability:** To ensure long-term impact, the training framework should be embedded into professional development and continuing education requirements across child welfare, education, healthcare, and criminal justice sectors. DCJS will maintain statewide oversight of mandatory reporter training, validate curriculum quality and ensure consistency across agencies, while leveraging nonprofits such as Safe House Project, Safe Harbor, and Samaritan House to expand delivery capacity and increase the frequency of training statewide.

Collaboration between VDOE, local school systems, VDSS, and DCJS should be formalized through Memoranda of Understanding (MOUs) that outline joint responsibilities for training, reporting protocols, and referral pathways. This structure will help schools integrate trafficking prevention into daily practice, ensuring continuity of care and academic stability for at-risk students.

Sustainability will also rely on braided funding (e.g., CAPTA, VOCA, Title IV-E, state appropriations) and a Continuous Quality Improvement (CQI) loop that uses standardized metrics, survivor input, and data from systems like CCWIS and VSDCS to adapt training content over time. By institutionalizing these partnerships and practices, Virginia can maintain a coordinated, trauma-informed, and survivor-centered training framework that evolves with statewide priorities and emerging best practices.

### **Standardize and Pilot Trauma-Informed Protocols and Training**



**Action:** Design and implement a pilot program featuring standardized, trauma-informed, and youth-centered protocols and training modules for multidisciplinary teams in select regions. Require active participation from all core agencies, including child welfare, law enforcement, healthcare, and education, and ensure the content comprehensively addresses the identification, referral, and support of trafficked youth.

**Why it Matters:** Piloting these protocols establishes a consistent foundation for early identification and coordinated response, while creating space for real-time feedback, local adaptation, and continuous improvement. It ensures all team members are aligned in language, approach, and responsibilities when working with at-risk or trafficked youth.

**Sustainability:** This phased, evidence-informed approach lays the groundwork for a scalable, survivor-centered model that can be adopted statewide. Piloting not only enhances quality and efficacy but also builds early buy-in across agencies, demonstrates measurable outcomes, and accelerates Virginia’s readiness for successful system-wide implementation.

### **Expand and Standardize Trauma-Informed Training for Youth-Serving Professionals**

**Action:** Launch a comprehensive statewide initiative to deliver mandatory, recurring trauma-informed training for all professionals who interact with youth, including educators, healthcare providers, social service personnel, and law enforcement officers. The training should be interactive and scenario-based, with a focus on identifying trafficking-specific behavioral cues, recognizing trauma indicators, and following appropriate, survivor-centered referral protocols.

**Why It Matters:** This initiative directly addresses current inconsistencies in the identification and response to youth trafficking. It aligns with recent updates to the Code of Virginia, which expand the scope of mandated reporters, and fulfills CAPTA (Child Abuse Prevention and Treatment Act) workforce training requirements. National best practices underscore the need for regular, hands-on training to equip professionals with the skills to intervene early and respond without causing further harm.

**Sustainability:** By embedding this training into existing professional development and continuing education requirements, Virginia can ensure long-term capacity-building, reinforce trauma-informed values across systems, and drive a statewide culture shift toward proactive, coordinated, and compassionate responses to trafficking.

### **Assign DCJS as Lead for Statewide Mandatory Reporter Training Oversight**



Given its statutory authority, existing training infrastructure, and designated role as administrative lead for the proposed Statewide Centralized System and Commission, the Virginia Department of Criminal Justice Services (DCJS) should serve as the primary entity responsible for overseeing statewide mandatory reporter training on human trafficking. DCJS is best positioned to establish and maintain standardized training curricula, ensure alignment with trauma-informed and survivor-centered best practices, and manage quality assurance across agencies and disciplines. To maximize reach and leverage subject matter expertise, DCJS should coordinate closely with the Virginia Department of Social Services (VDSS) to integrate child welfare mandates and CCWIS data protocols; the Virginia Department of Education (VDOE) to embed training within educator and school personnel professional development; the Virginia Department of Health (VDH), and the Department of Behavioral Health and Developmental Services (DBHDS) to address behavioral health and trauma indicators; and other stakeholders

where their mission role is a priority (ex. VDOT awareness notices at airports, etc.). Nonprofit and survivor-led organizations, including Safe House Project, Safe Harbor, and Samaritan House, should be engaged through a train-the-trainer model to expand delivery capacity, especially in rural and underserved regions, and to ensure survivor-informed content is incorporated. Oversight of this coordinated training framework should rest with a Commission Training Subcommittee, chaired by DCJS and co-chaired by VDSS, to establish curriculum standards, monitor statewide implementation, and guide continuous quality improvement. This structure ensures all mandated reporters, across education, healthcare, law enforcement, and child welfare, receive consistent, high-quality training that supports early identification, coordinated response, and improved outcomes for trafficked youth across the Commonwealth.

#### 1.2.4 LONG-TERM AND YOUTH-SPECIFIC SUPPORT SERVICES

##### ***Service Offerings and Gaps for Trafficked Victims and Survivors in Virginia (Youth Focus):***



Virginia has made progress in developing a network of services for trafficked victims and survivors, particularly youth, but significant gaps remain in trauma-informed care, housing, behavioral health, education, and comprehensive legal services. However, the availability and quality of these services vary significantly by region. Many programs depend on limited grant or philanthropic funding, resulting in gaps across critical areas of support, including:

- **Trauma-Informed Care:** Inconsistent access, especially in rural areas; limited specialized training.

- **Survivor-Led Guidance:** Lack of structured, consistent pathways for survivors to evaluate the quality of services they receive, provide feedback on agency or organizational training, and ensure survivor-informed input is embedded in care practices for youth trafficking victims. Existing mechanisms are largely informal, inconsistent, or absent.
- **Housing:** Few dedicated, long-term and intermediate options for trafficked youth. Many short- and long-term safe houses are also concentrated in large population zones, and/or have long waitlists.
- **Education:** Barriers to re-enrollment and limited trauma accommodations.
- **Behavioral Health:** Shortage of specialists and access issues for uninsured survivors.
- **Legal Assistance and Advocacy (civil and criminal):** Limited resources, particularly for undocumented individuals and youth who have been criminalized, resulting in inconsistent access to immigration relief, expungement, victim compensation, and advocacy during criminal proceedings.
- **Economic Empowerment:** Limited statewide availability of job readiness and financial support. Frontline workers often lack knowledge of DBRA (Debt Bondage Relief Act) processes, which are essential for helping survivors remove credit damage caused by their exploitation.
- **Family Reunification, Language Access, and Crisis Intervention:** Services are uneven and not universally available.
- **Medical/Medicaid Support:** Emergency Medicaid only; limited behavioral health access and access varies by region and provider capacity. Current gaps affect trauma treatment, urgent care, and ongoing therapies for victims, with unreliable alternate funding mechanisms for medical expenses.

Additionally, there are youth-specific barriers impacting the utilization of support services, including:

- Complex trauma, unstable housing, and systemic obstacles are more acute for youth.
- Geographic disparities and fragmented systems exacerbate challenges. Providers and professionals in the criminal justice system need to be educated on addressing and treating runaway youth with the same importance and urgency as kidnapped youth. The behaviors of runaway youth are complex and require better understanding to not unintentionally overlook the high likelihood they could be human trafficking victims requiring specialized services and resources.

**Table 6** summarizes the initial gaps identified with the current youth-focused offerings.

**Table 6: Summary of Service Offerings and Gaps**

| Service Area          | Current Offerings                                                             | Key Gaps/Challenges                                                     |
|-----------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Trauma-Informed Care  | CACs, hospital programs, nonprofits, some trained providers                   | Inconsistent access, limited training, funding gaps                     |
| Housing               | The Hallow, Survivor Ventures, Samaritan House, Safe Harbor, The Lampstand VA | Few youth beds, limited long-term options, exclusion of high-need youth |
| Education             | Prevention curriculum, some school-based programs, nonprofit support          | Inconsistent access, re-enrollment barriers, limited career support     |
| Behavioral Health     | On-site counseling (YFT, CACs), nonprofit support                             | Shortage of trauma specialists, access barriers, poor coordination      |
| Legal Aid             | Ayuda, LSNV, victim advocacy                                                  | Limited resources, criminalization, lack of awareness                   |
| Economic Empowerment  | Survivor Ventures, job training, financial literacy, cash assistance          | Limited scale, barriers due to records/discrimination                   |
| Family Reunification  | NVFS, some case management, counseling                                        | Limited availability, lack of trauma-informed therapy                   |
| Language Access       | Ayuda, language line, multilingual staff                                      | Inconsistent, especially outside urban areas                            |
| Basic Needs           | Food, clothing, transportation, emergency funds                               | Not universally available, especially in rural areas                    |
| Crisis Intervention   | 24/7 hotlines, mobile teams, crisis counselors                                | Not consistent statewide, limited specialized response                  |
| Peer Support          | Survivor-led groups, mentorship in some programs                              | Limited reach, not universally available                                |
| Immigration Aid       | Ayuda, USCRI, legal services                                                  | Limited resources, lack of awareness, complex cases                     |
| Prevention/Outreach   | School programs, community education, street outreach                         | Not universal, many youth remain unidentified                           |
| Child-Friendly Spaces | The Hallow, some CACs                                                         | Rare, most regions lack dedicated facilities                            |

Additional essential services and gaps in other support areas that may have an impact include:

- Comprehensive Trauma-Informed Case Management: Ongoing, coordinated support to navigate complex systems and connect to all needed services is essential but not universally available.
- Survivor Leadership: Involving survivors in program design and delivery is recognized as a best practice but is not consistently implemented statewide.
- Culturally Responsive Care: Services tailored to survivors' cultural and linguistic backgrounds are limited, especially in less diverse regions.

- Long-Term Support: Most programs focus on short-term stabilization; long-term, holistic support for independence and healing is lacking.
- Data and Evaluation: There is a need for better data collection, evaluation, and quality improvement to inform service delivery and policy.

Virginia offers a patchwork of trauma-informed, housing, behavioral health, educational, legal, and economic services for trafficked youths, with notable strengths in some regions and organizations. Gaps in the availability and scope of long-term support for trafficking survivors do exist. As stated above, geographic disparity is a challenge. Urban regions like Northern Virginia, Richmond, and Hampton Roads have multiple service providers and task force initiatives, whereas rural areas have fewer local services. A victim recovered in a rural or small-town locality might have to be referred to a program in the nearest city (which could be hours away) or rely on general social services that may not have trafficking-specific expertise. Ensuring that rural victims have access to safe housing and trauma-informed care is an ongoing concern; this might require increased use of mobile services or transportation assistance to existing programs. Another gap is the lack of dedicated long-term housing and support programs tailored to trafficking survivors. Emergency shelters (including domestic violence shelters) can take in trafficking victims short-term, but long-term housing options like transitional living programs or specialized foster care for trafficked youth are limited. Safe and stable housing is often cited by survivors as a critical need for staying out of exploitative situations. Similarly, comprehensive case management that stays with a survivor for the long haul (12-24 months) is resource-intensive and not universally available.

Coordination of services is also an issue. While the State Trafficking Response Team and various task forces try to connect the dots, survivors with complex trauma may need multiple systems (mental health, substance abuse treatment, educational support, job training, legal aid). Navigating these can be difficult without a dedicated advocate. Virginia has experimented with multi-disciplinary teams in some areas, for example, the Hampton Roads Task Force uses a victim-centered approach where law enforcement and service providers work in tandem to ensure each identified victim is offered support. Expanding that collaborative model statewide is a continuing opportunity. It's worth noting that many survivors have criminal records from their trafficking experience (e.g., convictions for crimes they were forced to commit). This creates barriers to employment, housing, and even accessing some services. Virginia advocates have pushed for broader criminal record relief (expungement/vacatur) for trafficking survivors, but legislation on that front has lagged. The inability to clear records (beyond prostitution convictions) means, as one expert noted, "60% of survivors have felony records" related to their exploitation, hindering their recovery. This is an area where long-term support intersects with legal reform.

Statewide gaps persist in access, capacity, and coordination, especially for youth with complex needs, those outside major urban centers, and those requiring long-term, holistic support. Addressing these gaps will require expanded funding, workforce training, cross-sector collaboration, and survivor leadership to ensure all trafficked youths in Virginia receive comprehensive, survivor-centered care.



While youth trafficking victims across the U.S. face significant needs and barriers, including trauma-informed care, housing, education, legal aid, and systemic obstacles, these challenges are often more acute and specific in Virginia. Youth trafficking victims face complex, overlapping needs and barriers, including trauma, unstable housing, limited access to education and legal aid, and systemic obstacles such as underreporting, lack of training, and fragmented services. In Virginia, these challenges are compounded by resource limitations, geographic disparities, and legal hurdles, leaving many youths without adequate, trauma-informed, and coordinated support.

**Table 7** summarizes barriers experienced by youth traffic victims.

**Table 7: Key Differences in Youth Traffick Victims Need/Barriers**

| Area                 | Broad (U.S.) Needs/Barriers                       | Virginia-Specific Needs/Barriers                        |
|----------------------|---------------------------------------------------|---------------------------------------------------------|
| Trauma-Informed Care | General shortage, need for specialized services   | Fewer trained providers, especially outside urban areas |
| Housing              | Limited youth-specific options                    | Very few dedicated beds, exclusion of high-need youth   |
| Education            | Barriers to re-enrollment, trauma accommodations  | Inconsistent access, limited career support             |
| Legal Aid            | Need for record relief, immigration support       | Narrow vacatur law, limited resources, criminalization  |
| Case Management      | Fragmented systems, lack of coordination          | Lack of formal protocols, data, and collaboration       |
| Language/Cultural    | Need for multilingual, culturally responsive care | Inconsistent access, especially in rural areas          |
| Crisis Intervention  | Not always available                              | Inconsistent statewide, limited specialized response    |
| Peer Support         | Limited survivor-led programs                     | Very limited, especially outside metro areas            |
| Prevention/Outreach  | Not universal, many youth unidentified            | Not universal, many youth unidentified                  |
| Resource Gaps        | Funding, staffing, and training limitations       | Over 80% of agencies report inability to meet needs     |
| Geographic Disparity | Urban/rural divide in service access              | Services concentrated in urban areas, rural gaps        |

Virginia’s limited specialized resources, legal hurdles, geographic disparities, and fragmented service systems create additional barriers for youth. Addressing these differences requires targeted investment, expanded training, legal reform, and statewide coordination to ensure all trafficked youth in Virginia receive comprehensive, survivor-centered care.

To strengthen long-term support, Virginia can take several strategic actions. First, **expanding specialized housing and residential programs is critical**. This could include funding additional safe house programs or supporting host family/foster family models for trafficked youth. For example, establishing a safe home in Southwest or Central Virginia (areas currently underserved) could address the rural service gap. Public-private partnerships may help here –

Virginia could seed fund a program and partner with nonprofits or faith-based groups experienced in trauma-informed care.

***Sustainable funding will be key:*** tapping federal grants (such as OVC human trafficking services grants) and state funds (perhaps via a dedicated **Anti-Trafficking Survivors Trust Fund**, as was proposed in 2022 ( HB 755)) could provide resources to launch and maintain housing and service initiatives. Another strategy is integrating services into existing systems like healthcare and schools. Best practices from other states show the effectiveness of **“wraparound” services** – where survivors receive coordinated support for all needs (medical, mental health, substance abuse, legal, vocational).

***Virginia has already taken a step by engaging the healthcare sector:*** The Virginia Commonwealth University (VCU) Health System has faculty leading training on recognizing trafficking and has called for **specialized health clinics** for trafficking victims. Implementing trauma-informed medical protocols (private waiting areas, longer appointment times, on-site social workers) can encourage survivors to seek care without fear. Virginia could pilot a program where a healthcare provider (perhaps a community health center or a Medicaid managed care plan) partners with service agencies to create a “one-stop” clinic for survivors, providing physical and mental healthcare alongside case management. In Arizona, a collaborative model involving a Medicaid health plan (Mercy Care), law enforcement, and service providers was able to achieve that kind of comprehensive care with notable success – identifying 126 child trafficking victims and keeping **96% of those children engaged in treatment for their complex health needs**. Virginia can look to replicate such models through its Medicaid managed care networks or local hospital systems.

Virginia’s current multi-agency collaboration system is underpinned by mandated multidisciplinary teams, flexibility for local innovation, improved awareness and identification efforts, early adoption of data systems, ongoing legislative progress, support for specialized services, engagement in public-private partnerships, and incremental movement toward best practices. These strengths provide a solid foundation for further improvements in statewide coordination, consistency, and survivor-centered care. However, current collaboration in Virginia is primarily decentralized. Each locality is required to establish a multidisciplinary human trafficking response team, typically coordinated by the Commonwealth’s Attorney. Coordination, protocols, and meeting frequency vary widely by region, and there is no single statewide lead agency with formal authority over all efforts.

Virginia’s ability to enhance effective multi-agency collaboration is hindered by several critical gaps. Training access remains inconsistent across regions and disciplines, with no standardized framework to ensure uniformity in content or delivery. Existing training programs often fail to address essential topics such as youth-specific behavioral cues, trauma indicators, and trafficking-related scenarios, limiting the ability of professionals to identify and respond appropriately to victims. Furthermore, the absence of a statewide system for quality assurance and recurring training undermines efforts to build and maintain a shared, trauma-informed foundation across agencies.

**Table 8: Gaps in Virginia’s Current Decentralized Collaboration Efforts**

| Gap Area                     | Description                                                                                  | Impact on Youth Survivors and System Performance                                                                                                        |
|------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Centralized Leadership       | No statewide lead agency; fragmented coordination                                            | Inconsistent standards, reduced accountability                                                                                                          |
| Stakeholder Engagement       | Variable participation; unclear roles; limited survivor input                                | Inefficient collaboration; missed perspectives                                                                                                          |
| Assessment Tool Utilization  | Inconsistent use and/or lack of proper human trafficking assessment tool to identify victims | Missed opportunities to accurately identify victims and provide services and resources; incomplete and inaccurate quantitative depiction of the problem |
| Data Collection & Sharing    | Disparate systems; lack of standard metrics; limited real-time sharing                       | Incomplete picture, delayed response                                                                                                                    |
| Training & Capacity          | Inconsistent, non-recurring training; limited cross-agency learning                          | Variable identification and response quality                                                                                                            |
| Geographic & Resource Equity | Urban concentration of services; rural gaps; funding shortages                               | Unequal access and outcomes                                                                                                                             |
| Risk of Fragmentation        | Duplication in some areas; gaps in others; difficulty scaling local successes                | Inefficient use of resources; inequitable service delivery                                                                                              |

A centralized, multi-agency system with clear leadership, formal governance, integrated data, and standardized training, balanced by mechanisms to preserve and amplify local innovation, offers a realistic path to harness economies of scale while maintaining the strengths of community-driven efforts. This approach aligns with state law, federal mandates, and national best practices, ultimately improving outcomes for youth survivors across the Commonwealth.

Scaling trauma-informed housing, behavioral health, and wraparound services for trafficked youth necessitates sustained funding. Federal VOCA and Runaway and Homeless Youth Act (RHYA) grants, combined with state appropriations and Medicaid waivers, can finance residential programs, mobile crisis teams, and peer mentorship initiatives. Public-private partnerships, particularly with faith-based and survivor-led organizations, offer additional opportunities to expand reach and close rural service gaps. The roadmap in Section 1.2.5.4 operationalizes these funding strategies.

#### **1.2.4.1 Long-Term and Youth-Specific Recommendations**

##### **Expand Youth-Specific, Trauma-Informed Housing and Support Services Statewide**

**Action:** Invest in the development and statewide expansion of dedicated, long-term housing options for trafficked youth, including specialized shelters, transitional living programs, and host homes. These housing models must be paired with



comprehensive, trauma-informed wraparound services, such as mental health care, educational support, legal advocacy, and economic empowerment resources.

**Why It Matters:** Virginia currently faces critical gaps in safe, youth-specific housing and holistic care for survivors of trafficking. Without stable, developmentally appropriate options, many young people are left vulnerable to re-exploitation. National best practices and **CAPTA guidance** emphasize the importance of survivor-centered environments that prioritize safety, healing, and long-term stability. Expanding these services statewide not only addresses geographic inequities but also reinforces Virginia’s legislative commitment to recognizing trafficked youth as victims in need of protection—not punishment.

**Sustainability:** To ensure long-term impact, Virginia should pursue a **blended funding model**—leveraging state resources, braided federal funding streams (e.g., VOCA, RHYA, Medicaid), and innovative **public-private partnerships**. This approach reduces dependence on short-term grants, builds local ownership, and supports the creation of a robust, sustainable continuum of care.

The state of Virginia could benefit from existing national human trafficking programs that focus on survivor housing, services and education that include addressing the needs of youth human trafficking victims. The Safe House Project is a national anti-trafficking organization headquartered in Virginia Beach, Virginia, dedicated to increasing identification of human trafficking victims in the United States and providing safe, restorative housing for survivors, with a distinct focus on youth and child trafficking survivors. Without a secure, supportive environment, survivors face a heightened risk of re-exploitation, homelessness, and long-term trauma. To address this need, the Safe House Project operates and supports a comprehensive housing model that includes long-term shelter services, transitional program services, and a national housing certification program, with particular emphasis on youth survivors of sex trafficking.

To expand safe housing and ensure high standards of care, the Safe House Project developed a Housing Certification Program focused especially on youth trafficking survivors.

Program highlights include:

- Establishing national best practice standards
- Certifying safe houses that meet trauma-informed care benchmarks
- Training staff in youth-centered practices
- Expanding the network of qualified housing providers
  - Current housing providers in Virginia looking to expand their residential housing offerings could seek the Safe House Certification to build credibility with existing and future donors, foundations and government agencies.
  - In addition, the Safe House Project provides funding to organizations that serve trafficking survivors and could prove to be a much-needed funding resource for service providers in Virginia.

## Establish a Statewide Survivor Council

**Action:** Establish a **formal statewide Survivor Council** to serve as a formal advisory body within the Commission, with voting rights on survivor-specific recommendations but not administrative decisions. Infusing lived experience leaders into the framework of the Commission will ensure relevant and consistent, structured input into program design, policy development, training initiatives, and continuous quality improvement efforts at both the state and regional levels, that considers service needs from the survivors' perspective.



**Why It Matters:** Meaningful survivor engagement is not only a cornerstone of national best practices and CAPTA compliance, but also essential to ensuring services are trauma-informed, culturally responsive, and aligned with the real-world needs of those they are designed to support. Centering the voices of individuals with lived experience strengthens system accountability, uncovers hidden barriers, sparks innovation, and ensures that policies and programs are survivor-centered, not just survivor-informed.

**Sustainability Strategy:** By embedding survivor leadership within formal governance structures, Virginia can ensure that survivor perspectives remain central and influential as policies, practices, and systems evolve. Institutionalizing this council supports long-term relevance, equity, and responsiveness—transforming survivor input from one-time feedback into ongoing, empowered leadership.

## Implement a Statewide Centralized System (SCS) Including a Statewide Human Trafficking Commission



To strengthen statewide multi-agency collaboration in addressing human trafficking, Virginia should implement a centralized, coordinated system. The permanent Statewide Human Trafficking Commission could serve as the governance authority for the Commonwealth's centralized multi-agency collaboration system on human trafficking. The system would be administered by the Department of Criminal Justice Services (DCJS) in coordination with state agencies, the statewide survivor council, and community partners.

## Governance Structure and Principles

The Commission shall:

1. Function as the statewide governance authority overseeing policy, data integration, interagency coordination, and performance tracking.
2. Operate under a survivor-centered, trauma-informed, culturally responsive framework, explicitly prohibiting criminalization of victims.
3. Include survivor representatives or survivor-led organizations as voting members, constituting at least 25% of voting rights.

4. Include representatives from DCJS, VDSS, the Office of Attorney General, law enforcement (VSP and local), VDH, VDOE, and others as determined.
5. DCJS shall serve as administrative lead, implementing the system under Commission direction; decision-making authority rests with the Commission.

### **Reporting and Accountability**

The Commission and DCJS shall:

1. Define measurable outcomes for service coordination, data sharing, survivor well-being indicators.
2. Submit an annual report to the Governor and General Assembly.
3. Hold quarterly public briefings and maintain a publicly accessible dashboard.
4. Recommend any modifications to appropriations or statutory authority.

### **External Funding and Sustainability**

It is recommended DCJS be authorized to pursue federal and private funding to supplement state funds. All external funding acceptance and use must be approved by the Commission, including the Survivor Council, ensuring alignment with governance principles. Such funding shall not override Commission oversight.

The proposed model would clearly delineate roles and responsibilities across state and local partners and leveraging Memorandum of Understanding (MOU) and the CDT; and should include the Office of the Attorney General, Virginia Department of Social Services (VDSS), Virginia State Police (VSP), Commonwealth's Attorneys, Virginia Department of Education (VDOE), Virginia Department of Health (VDH), Department of Behavioral Health and Developmental Services (DBHDS), Children's Advocacy Centers (CACs), healthcare systems, nonprofit providers, and survivor leaders. A formal governance structure would be established, consisting of a statewide Steering Committee, regional multidisciplinary teams (MDTs), and a Survivor Council to embed survivor input in all decision-making and quality improvement efforts.

All participating agencies would provide aggregate, anonymized data to a unified statewide platform. The platform would use standardized data fields and metrics to track overall service access, outcomes, training compliance, and equity indicators, not individual case details. No personally identifiable information (PII) would be collected or shared, and the system would be designed in full compliance with applicable federal and state confidentiality laws (including HIPAA, VOCA, and relevant Virginia statutes). The system would include robust confidentiality protections, incorporate continuous quality improvement processes, and require annual public reporting to promote transparency and system-wide learning without compromising victim privacy.

Statewide adoption of uniform, trauma-informed protocols would be mandated, alongside recurring, interactive training for all mandatory reporters and frontline staff. Training would

be standardized and scenario-based, with a focus on youth behavioral cues, trauma responses, the intersectionality of support needs, and trafficking-specific dynamics.

The Survivor Council would serve as a core component of governance, ensuring survivor voices guide policy, training design, and quality assurance at both the state and regional levels. The model includes clear performance metrics for system capacity, service delivery, survivor engagement, and equity, with regular evaluation to inform policy, funding, and continuous improvement.

An example of successful statewide multi-agency collaboration is Florida's direct-support organization, the Florida Alliance to End Human Trafficking. This nonprofit supports the Statewide Council on Human Trafficking through appropriated funds from the state's General Revenue Fund. It facilitates survivor engagement through speaking opportunities, promotes the Survivor Bill of Rights, and coordinates training and awareness programs across law enforcement, hospitality, healthcare, and education sectors. The organization also centralizes resources, publications, and training materials for agencies and nonprofits involved in anti-trafficking efforts.

Supported by the Alliance, the Statewide Council on Human Trafficking comprises 15 entities, including DCF, FDLE, DOH, DJJ, AHCA, DOE, and legislative appointees. It oversees regional task forces and coalitions to advance cross-sector collaboration and best practice sharing statewide.

Initially funded with a \$250,000 appropriation in FY2019–2020 and an additional \$500,000 in FY2022–2023, the Alliance continues its work through state and federal grants. In partnership with the USF TIP Lab, it leverages data for strategic proposals and program evaluations. The Alliance also issues grant funding to law enforcement agencies for technology upgrades and continuing education.

A similar nonprofit structure in Virginia could promote continuity and capacity, especially for administering matching grants and sustaining multi-agency efforts. For example, the Safe House Project employs a Survivor Support Team approach of working with healthcare providers, advocates, and law enforcement to help victims exit trafficking and begin their journey to healing and independence. In addition, the Safe House Project has a robust offering of online training for a variety of audiences. Some courses are at no cost while others for professionals' range in cost. Examples of training include:

- OnWatch Training – helps the public identify human trafficking victims
- Academic Healthcare Training – learn to identify and respond to human trafficking
- Healthcare Training (2.0 hrs.) and Healthcare Training (1.0 hrs.)
- In-Home Service Providers training
- Just Ask Prevention Curriculum – human trafficking prevention curriculum to educate youth



- TRAP (Trafficking Resistance, Awareness, and Prevention) – school-based program that partners with SROs (Student Resource Officers) to create a direct line of defense to actively protect and prevent children from becoming victims of human trafficking

As previously stated, the Safe House Project would act as a certifying and referral hub for safe housing programs statewide, ensuring quality standards, trauma-informed care, and survivor placement pathways; and leverage organizations like Virginia Safe Harbor and Samaritan House of Virginia as the regional anchor model provider within the SCS and as Commission member to managing direct service delivery (emergency housing, case management, legal advocacy, children’s services) to prototype delivery in Hampton Roads and where feasible expand deployment across state regions.

Strategically leveraging these organizations would strengthen Virginia’s capacity to support survivors of human trafficking and enhance statewide coordination.

**Safe House Project**, a national nonprofit headquartered in Virginia, specializes in expanding and certifying safe housing programs for trafficking survivors and provides large-scale training on trafficking identification and response. Their expertise in establishing national standards, certifying programs, and coordinating survivor placement could be applied to help Virginia identify gaps in safe housing capacity, develop quality assurance standards for programs, and create statewide referral protocols for emergency and long-term housing.

**Samaritan House**, a regional leader in Hampton Roads, operates a comprehensive network of emergency and permanent housing, wraparound support services, and trauma-informed programming for individuals and families affected by domestic violence, sexual assault, human trafficking, and homelessness. Their integrated approach to survivor care, including crisis response, legal advocacy, counseling, and child-specific supports, positions them as a model for regional service delivery and a vital partner in scaling effective practices statewide.

**Safe Harbor**, a regional leader in the Richmond area, provides services to human trafficking victims and survivors that is trauma-informed individual and group counseling in English and Spanish for women, men, and teen human trafficking survivors; emergency and transitional housing for adult human trafficking; and community outreach and education to include businesses, places of worship, middle and high schools (prevention) and community groups.

By embedding these organizations within the centralized system as lead organizations in the Commission, Virginia could align Safe House Project as a certification and placement hub while designating organizations like Samaritan House and Safe Harbor as regional anchor providers, ensuring both national standards and local expertise are reflected in service delivery. Through shared data and coordinated case management, the centralized system could provide real-time insight into statewide service availability, outcomes, and emerging needs.

Safe House Project could co-lead a workgroup with DHCD focused on housing certifications and placement, leveraging its national insights to guide system design and expansion. Samaritan House and Safe Harbor could lead or co-lead direct services and survivor support

workgroups, ensuring statewide recommendations reflect the realities of local service delivery and the intersections of trafficking with other forms of violence.

Additionally, the Commonwealth could combine these organizations' expertise to inform the design and expand capacity to deliver **mandatory reporter training**. Safe House Project's scalable national programs can support funding, as well as standardized awareness and recognition content (specifically where housing is concerned), while Samaritan House and Safe Harbor can contextualize training to address co-occurring domestic and sexual violence and provide localized referral pathways. Together, this partnership could enable both virtual and in-person training delivery, reaching professionals in education, healthcare, law enforcement, and child welfare across the state.

This dual-leverage approach, combining Safe House Project's national reach and housing expertise with Samaritan House's and Safe Harbor's regional service model and wraparound supports, would allow Virginia to establish a survivor-centered, scalable system that aligns with best practices, maximizes existing capacity, and strengthens coordination through the centralized system and Commission framework.

**Table 9: Stakeholders, Roles & Responsibilities**

| Stakeholder                                                      | Roles & Responsibilities                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DCJS (Lead Agency)                                               | Convene and coordinate system; aggregate relevant funding data for CSC activities across stakeholders; oversee data collection and reporting; ensure compliance; and availability of quality training for mandatory reporters                                                                    |
| Office of the Attorney General (OAG)                             | Legal guidance; prosecution support; policy leadership; interagency agreements; public awareness                                                                                                                                                                                                 |
| Department of Social Services (VDSS)                             | Child welfare response; case management                                                                                                                                                                                                                                                          |
| Virginia State Police (VSP) & Local Law Enforcement              | Investigate cases; refer victims; participate in multidisciplinary teams; data sharing                                                                                                                                                                                                           |
| Commonwealth's Attorneys Services Council (CASC)                 | Prosecutorial training; case review; legal strategy coordination                                                                                                                                                                                                                                 |
| Department of Education (VDOE)                                   | School-based prevention; training for educators; referral protocols; data sharing                                                                                                                                                                                                                |
| Department of Behavioral Health & Developmental Services (DBHDS) | Behavioral health services; crisis intervention; mobile response teams                                                                                                                                                                                                                           |
| Virginia Department of Health (VDH)                              | Public health approach; victim identification; health and human service capacity building; education and training for healthcare providers, educators, etc.; public awareness campaigns; and regulation of the training of overnight lodging facilities (hotels, motels, and bed and breakfasts) |
| Child Advocacy Centers (CACs)                                    | Forensic interviews; trauma-informed care; multidisciplinary case review                                                                                                                                                                                                                         |

| Stakeholder                                                     | Roles & Responsibilities                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nonprofit & Community-Based Organizations                       | Survivor services (housing, legal aid, peer mentorship, economic empowerment); outreach; survivor engagement; support capacity building for training                                                                                                                                                                                                              |
| Survivor Leaders/Council                                        | Program and policy input; training development; quality improvement; peer mentorship                                                                                                                                                                                                                                                                              |
| Health Care Systems                                             | Trauma-informed medical/mental health care; screening; referral; data sharing and health related data collection                                                                                                                                                                                                                                                  |
| Local Government (e.g., DSS, CSBs)                              | Local coordination; service delivery; participation in multidisciplinary teams                                                                                                                                                                                                                                                                                    |
| Virginia Department of Transportation                           | Transportation infrastructure management; placement and maintenance of human trafficking awareness signage at rest areas and welcome centers; provide transportation-related data (e.g., high-risk corridors) to task forces; coordinate with law enforcement during investigations; support prevention and awareness campaigns targeting transportation networks |
| Virginia Employment Commission (VEC)                            | Workforce development; job placement and training programs for survivors; unemployment benefits guidance; collaboration with MDTs and nonprofits to connect survivors to economic empowerment resources.                                                                                                                                                          |
| Department of Juvenile Justice (DJJ)                            | Juvenile detention screening and referral; trauma-informed rehabilitation; data sharing with MDTs; coordination with courts and community programs for diversion and support of trafficked youth.                                                                                                                                                                 |
| Virginia Department of Housing and Community Development (DHCD) | Safe and transitional housing grants; coordination of housing resources for survivors; integration of anti-trafficking priorities into homelessness prevention and rapid-rehousing programs.                                                                                                                                                                      |
| Virginia Department of Labor and Industry (DOLI)                | Enforcement of labor laws; identification and referral of labor trafficking cases; education and training for employers and workers; collaboration with MDTs on workplace trafficking indicators.                                                                                                                                                                 |
| Virginia Department of Corrections (VADOC)                      | Screening for trafficking indicators within correctional populations; referral for victim services; coordination with parole/probation officers to support reentry for trafficking survivors.                                                                                                                                                                     |
| Virginia Tourism Corporation (VTC)                              | Public awareness campaigns in hospitality and travel sectors; training support for tourism partners (hotels, events); coordination with VDOT and DCJS on signage and prevention messaging.                                                                                                                                                                        |

While DCJS brings valuable resources and authority to statewide coordination, no single entity alone can manage human trafficking and without robust checks and balances. Justice system actors often default to punitive responses when addressing youth involved in trafficking, particularly in environments where protocols and training are inconsistent or where oversight from child welfare and survivor advocacy sectors is limited.

Despite recent legislative reforms, significant statutory gaps persist, especially in vacatur laws and diversion protocols, which means that youth can still be charged or detained for offenses directly related to their exploitation. This concern is amplified by Virginia’s and other states’ historical precedent of criminalizing exploited youth. Shifting away from this deeply embedded pattern requires intentional, structural safeguards to ensure that vulnerable young people are treated as victims in need of support, not as offenders subject to further harm by the justice system. There is a legitimate risk that justice system priorities could overshadow the needs and rights of trafficked youth.

Embedding statutory protections, multidisciplinary governance, survivor leadership, trauma-informed protocols, and transparent data practices, such as those in **Table 10**, are essential to ensure that Virginia’s response remains victim-centered, developmentally appropriate, and aligned with both state law and national best practices for child trafficking.

**Table 10: Recommended Checks & Balances**

| Safeguard                          | Purpose                                   | Example Implementation                                           |
|------------------------------------|-------------------------------------------|------------------------------------------------------------------|
| Safe Harbor Laws                   | Prevent prosecution of trafficked youth   | Statutory prohibition, mandatory diversion                       |
| Survivor Council                   | Ensure survivor voice and oversight       | Policy review, case audits                                       |
| Child Welfare/Health Co-Leadership | Balance justice with welfare perspectives | Dual agency leadership                                           |
| Independent Ombudsperson           | Provide external accountability           | Case investigations, complaints process                          |
| Trauma-Informed Protocols/Training | Standardize non-criminal response         | Statewide, recurring, scenario-based                             |
| Data Transparency                  | Monitor and correct system outcomes       | Public reporting, Continuous Quality Improvement (CQI) processes |
| Cross-System MOUs and Case Review  | Shared accountability, prevent silos      | Formal agreements, multidisciplinary panels                      |

To balance independence and feasibility, for the Independent Ombudsperson, this role could initially be piloted as an external contracted position, enabling rapid deployment and survivor trust-building. Based on evaluation results, Virginia should consider transitioning the Ombudsperson to a quasi-independent office under state statute to secure long-term stability, investigative authority, and transparent public reporting. An alternative option includes housing the role within the Executive Branch (e.g., Office of the Governor or Secretary of Public Safety).

A robust, statewide multi-agency collaboration system, anchored by DCJS as lead, with clear roles, formal governance, unified reporting, and survivor leadership, will enable Virginia to deliver consistent, trauma-informed, and data-driven support for trafficked youth. This structure aligns with state law, CAPTA, and national guidance, ensuring accountability,

sustainability, and improved outcomes for youth survivors and the Commonwealth as a whole.

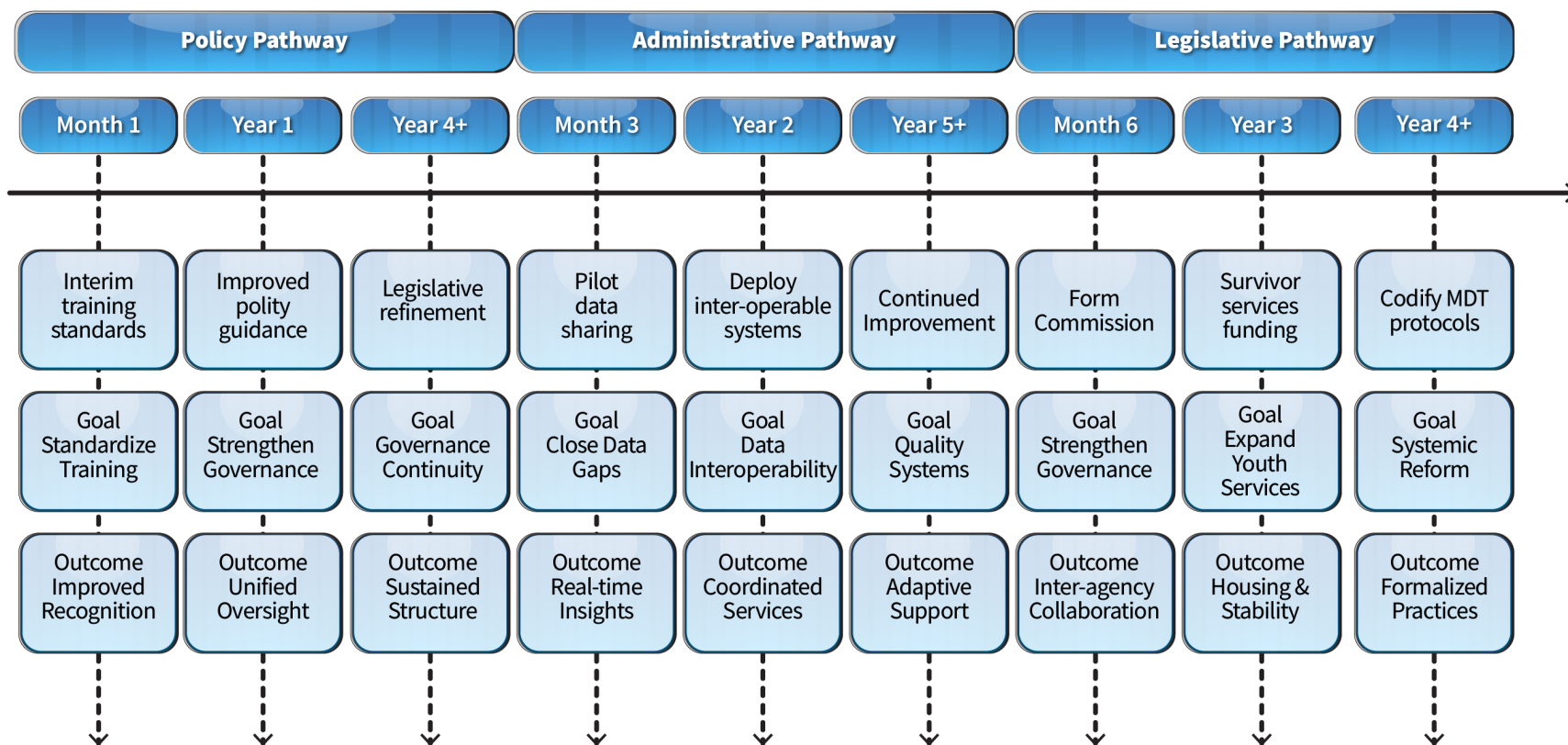
### **1.2.5 IMPLEMENTATION ROADMAP**

The following implementation roadmap provides a high-level framework to guide Virginia's efforts in advancing the recommendations of this strategic plan, focusing on improvements to address human trafficking data gaps, mandatory reporter training, and comprehensive long-term services for youth survivors. While this document does not represent a fully developed implementation plan, additional analysis and interagency coordination are required to define specific timelines, costs, and resource allocations, it offers a structured approach to prioritize actions, align with state and federal funding cycles, and ensure measurable progress over time.

An implementation roadmap is essential for translating strategic recommendations into actionable steps that are both feasible and sustainable. By sequencing activities into short-term (0–12 months), mid-term (1–3 years), and long-term (3+ years) horizons, the roadmap enables VDSS and its partners to synchronize initiatives with Virginia's annual and biennial budget processes, leverage federal funding opportunities (e.g., CAPTA, Title IV-E, VOCA), and coordinate across policy, administrative, and legislative pathways. This phased approach also aligns with several of the Governor's priorities to reduce taxpayer spending by maximizing use of existing resources, keeping communities safe from crime through improved prevention and intervention, making government more efficient by streamlining data systems and interagency collaboration, and increasing investment in Virginia by fostering public-private partnerships and scaling evidence-based practices.

The roadmap is organized around three primary action pathways, policy, administrative, and legislative, which together provide the flexibility to address immediate needs (e.g., training standardization) while building toward systemic reforms (e.g., integrated data platforms and

long-term care models). Each pathway supports VDSS's overarching goal of a coordinated, trauma-informed, and survivor-centered response, ensuring that youth impacted by trafficking receive timely identification, appropriate services, and ongoing support through adulthood. **Figure 2**, depicts the roadmap by phase.



VOSS 25-04

**Figure 2: Implementation Roadmap**



## Goals of the Implementation Roadmap

- *Close Data Gaps and Enhance Interoperability:* Modernize and integrate state data systems (CCWIS, VSDCS, LEDRS, and future CDT linkages) to enable real-time data sharing, improve case tracking, and inform statewide decision-making.
- *Standardize and Scale Mandatory Reporter Training:* Develop and deploy a unified training framework, leveraging national models like SOAR, to ensure all mandated reporters, educators, law enforcement, healthcare providers, and child welfare professionals, are equipped to recognize and respond to trafficking indicators.
- *Expand Long-Term and Youth-Centered Services:* Increase availability of trauma-informed housing, counseling, and vocational supports tailored to youth survivors, with particular focus on transition-age services that bridge adolescence and adulthood.
- *Strengthen Governance and Coordination:* Operationalize a Statewide Human Trafficking Commission (that aggregates existing and new human trafficking related activities for the Commonwealth) and regional MDT protocols to unify oversight, improve efficiency in service delivery, and align efforts across state, local, and nonprofit partners.

### Structure and Timeframes:

- *Short-Term (0–12 months):* Immediate actions such as forming governance bodies, establishing training standards, and initiating pilot data-sharing improvements.
- *Mid-Term (1–3 years):* Expansion of training statewide, deployment of interoperable data systems, and integration of survivor feedback into service delivery.
- *Long-Term (3+ years):* Sustained system maturity, continuous quality improvement, and legislative refinements to support enduring infrastructure and funding stability.

#### 1.2.5.1 Strategic Goals and Outcome Alignment



The implementation roadmap is rooted in the core goals of this strategic plan, **to close critical data gaps, standardize and scale mandatory reporter training, expand youth-centered services and support, and strengthen governance to ensure coordinated statewide response.** These goals are designed to yield measurable improvements in the lives of trafficked youth, including earlier identification and intervention, reduced re-traumatization through coordinated service delivery, greater access to long-term housing and wraparound supports, and improved transitions to adulthood. Success will be indicated by quantifiable outcomes such as increased rates of accurate trafficking identification, reduced service duplication, expanded availability of trauma-informed care, and measurable improvements in safety and stability indicators tracked through CCWIS and related systems.

The phased roadmap directly aligns these goals with Virginia’s budget and operational cycles, sequencing priorities to balance urgent needs with sustainable reforms. Short-term priorities

(0–12 months) focus on foundational actions establishing the Commission and governance structure, piloting data-sharing enhancements, and adopting statewide training standards. Mid-term priorities (1–3 years) expand implementation, including statewide training rollout, integration of data systems, and scaling survivor-informed service models. Long-term priorities (3+ years) emphasize continuous quality improvement, legislative refinements, and full system maturation to sustain outcomes and adapt to evolving best practices. This alignment ensures that each phase builds momentum toward the overarching objective: a unified, trauma-informed, and youth-centered system that improves outcomes while advancing the Commonwealth’s priorities of efficient government, public safety, and responsible stewardship of taxpayer resources.

#### *1.2.5.2 Action Pathways: Policy, Administrative, Legislative*

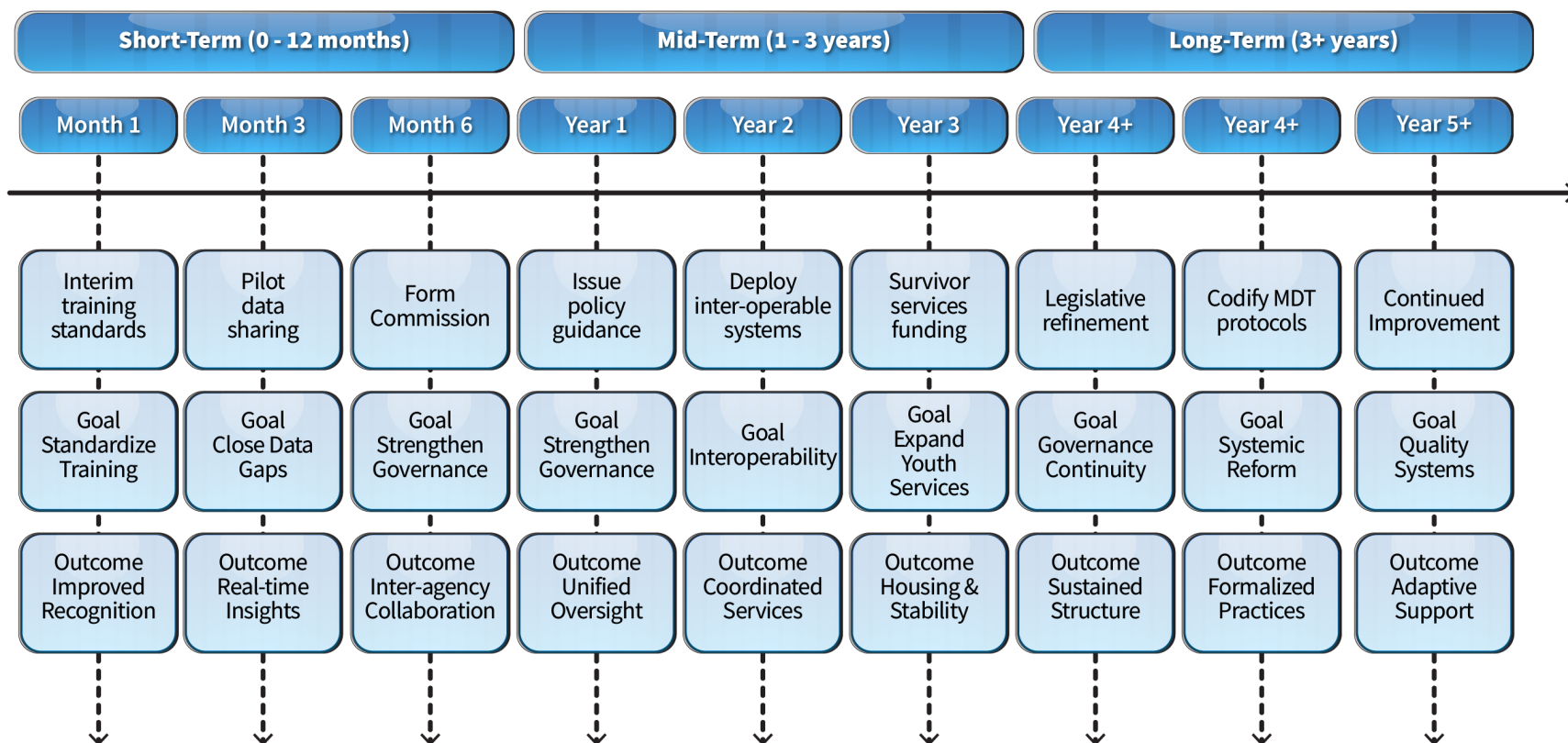
The objectives of this roadmap are to guide the Commonwealth in translating the strategic plan’s recommendations into coordinated actions that improve identification, response, and long-term outcomes for youth impacted by human trafficking. Each objective is supported by specific actions aligned to the plan’s four core goals closing data gaps, standardizing mandatory reporter training, expanding youth-centered services, and strengthening governance and coordination. These actions span policy, administrative, and legislative pathways, recognizing that successful implementation will require concurrent efforts across agencies, executive leadership, and the General Assembly. While this roadmap provides a structured starting point, all actions will need refinement and prioritization during execution to reflect final mandates, available resources, and evolving stakeholder input.

The policy pathway involves establishing or revising statewide standards, protocols, and interagency agreements without requiring statutory changes, for example, adopting a unified training curriculum informed by SOAR and survivor expertise. The administrative pathway focuses on operational changes within existing authorities, such as integrating CCWIS and VSDCS for improved case tracking or piloting multidisciplinary team protocols in high-need regions. The legislative pathway requires statutory action or new appropriations, such as creating a permanent Statewide Human Trafficking Commission or allocating dedicated funding for long-term housing supports. Each pathway includes clearly identified responsible authorities, VDSS and DCJS as lead implementing agencies, with contributions from State and nonprofit stakeholders (see Table 9) and will be sequenced in alignment with Virginia’s budget cycles and federal funding opportunities. Funding allocation should flow to the responsible agency; and be reported through the Commission for aggregation by DCJS to better track total investment for the SCS and Commission activities. This tiered approach ensures that urgent, low-cost improvements can begin immediately while mitigating duplication of efforts and building toward systemic reforms that require legislative support and sustained investment.

#### *1.2.5.3 Initiatives and Actions Items by Phase*

Implementation of the strategic plan should proceed in sequenced phases to balance immediate impact with long-term system transformation. Each phase—short-term (0–12

months), mid-term (1–3 years), and long-term (3+ years) is aligned with the plan’s three action pathways (policy, administrative, legislative) and is supported by defined roles for lead and partner agencies. The phased approach allows the Commonwealth to launch foundational improvements quickly, while building toward systemic reforms that require more extensive resources or statutory action. **Figure 3**, on the following page outlines the roadmap actions by phase.



**Figure 3: Implementation Actions by Pathway**



Quick wins within the first six months should focus on high-visibility, low-cost actions that immediately enhance coordination and lay the groundwork for future phases. These include: (1) convening the Statewide Human Trafficking Commission with defined governance and survivor representation; (2) adopting interim mandatory reporter training standards using existing curricula (e.g., SOAR framework) to address immediate gaps; and (3) piloting a data-sharing workgroup between VDSS and DCJS to prepare for future CCWIS and VSDCS integration. These efforts provide an early signal of progress, build stakeholder momentum, and support early alignment with the Governor’s priorities of keeping communities safe, increasing government efficiency, and responsibly investing taxpayer dollars.

Beyond these quick wins, short-term actions include finalizing statewide training frameworks, issuing policy guidance for multidisciplinary team protocols, and drafting memoranda of understanding for interagency data exchange. Mid-term actions focus on scaling training statewide, deploying interoperable data platforms, and piloting survivor-centered long-term housing supports. Long-term actions emphasize continuous quality improvement, legislative refinement (e.g., codifying the Commission), and embedding sustainable funding models across state and federal streams. Each action will identify responsible authorities (e.g., DCJS for training oversight, VDSS for child welfare data systems, VDOE for school integration) and deliver clear outputs such as standardized curricula, operational Commission charters, interoperable dashboards, and service capacity benchmarks. Sequencing these steps ensures that early administrative and policy gains establish a foundation for legislative reforms and enduring system change.

#### *1.2.5.4 Funding Strategy and Sustainability*

The funding and strategy sustainability approach aligns with programmatic priorities described in Data Gap Analysis (1.2.2), Training for Mandatory Reporters (1.2.3), and Long-Term and Youth-Specific Support Services (1.2.4). Funding recommendations leverage a blend of state appropriations, federal entitlements (e.g., VOCA, Title IV-E, CAPTA, RHYA), Medicaid waivers, and public-private partnerships (PPPs) to ensure a resilient and equitable financial foundation. To sustain and scale Virginia’s human trafficking response, the Commonwealth must adopt a diversified and forward-looking funding strategy. We explored public funding streams, including state appropriations and federal grants, and outlined opportunities to strengthen financial infrastructure through braided and blended funding models. It also examines the role of public-private partnerships, social innovation mechanisms such as impact investing and pay-for-success models, and alignment with policy and legislative frameworks to ensure long-term viability and cross-system collaboration.

Virginia’s Office of the Attorney General (OAG) receives federal grants from the U.S. Department of Justice (DOJ), including funding to investigate internet crimes against children through the ICAC initiative. Between 2020 and 2023, the OAG was awarded \$1.29 million from DOJ’s Office for Victims of Crime (OVC) to lead an Enhanced Collaborative Model (ECM) task

force aimed at improving statewide coordination to combat human trafficking. Given its law enforcement foundation, the OAG's federal grants tend to be more stable.

Meanwhile, VOCA allocations, a key funding source administered by the Virginia Department of Criminal Justice Services (DCJS), have declined by 15% in FY2024, contributing to broader uncertainty in the state's victim services landscape. Additional risks to DCJS and the Virginia Department of Social Services (VDSS) include delayed drawdowns due to federal payment system changes, mid-award cancellations, and increasingly complex reporting and verification requirements. Although DCJS maintains a robust grants office and is often well-positioned to align with federal expectations, VDSS's current performance tracking and financial auditing systems may require enhancements to meet the rigorous requirements of certain trauma-informed or youth-serving federal grants. Strengthening these systems could improve Virginia's competitiveness for future funding opportunities.

Compounding these challenges is a fiscal year misalignment: Virginia's fiscal year runs July 1 through June 30, while federal funding follows an October 1 start. As a result, Virginia agencies frequently rely on prior-year allocations or federal continuing resolutions to estimate future funding, potentially delaying programming or requiring upfront state expenditures. In such cases, unappropriated balances or reserve funds may need to be tapped until federal disbursements are received. These collective dynamics suggest that while OAG may offer a stable anchor for law enforcement-led trafficking interventions, DCJS remains best suited to head up strategic grants coordination due to its specialized capacity and existing infrastructure.

### **State and Federal Public Funding Streams**

#### **State Appropriations and Dedicated Funds**

- **Virginia Prevention of Sex Trafficking Fund:** This special non-reverting fund, administered by the Department of Criminal Justice Services, is used for prevention, awareness, and training. It is designed to be sustainable, with interest retained and not reverting to general funds and can be expanded to support broader anti-trafficking initiatives.
- **State Matching Grants:** The Code of Virginia authorizes the Department of Social Services to receive and disburse state and federal funds through matching grants to local agencies and nonprofits, supporting certified programs and incentivizing local investment.
- **Children's Justice Act Program (CHJA) One-time Grants** accepted by DCJS to support child-serving entities who are in these spaces: Trauma-informed child friendly spaces; Forensic interview equipment; Multidisciplinary Team (MDT) Development and Enhancement; and Volunteer Support and Recruitment.

## **Federal Formula and Competitive Grants**

- **VOCA (Victims of Crime Act) Grants:** VOCA funds are a cornerstone for victim services, supporting direct services, training, and data improvements. These grants require state match and are awarded on a recurring cycle, supporting both local and statewide programs.
- **CAPTA (Child Abuse Prevention and Treatment Act) Grants:** CAPTA provides formula and discretionary grants for prevention, training, data systems, and service improvements. Compliance with CAPTA is required for continued funding, and Virginia's plans must include provisions for mandatory reporting, data tracking, and multidisciplinary collaboration.
- **Office for Victims of Crime (OVC) and Department of Justice (DOJ) Grants:** These support multi-agency collaboration, training, and long-term support services, including recent awards to Virginia for youth trafficking response and data system enhancements.

## **Braided and Blended Funding Approaches**

**Braided Funding:** Combine multiple funding streams (state, federal, local, private) for a single initiative, allowing flexibility and sustainability even as individual sources fluctuate. This is especially effective for cross-agency training, data systems, and long-term support services.

**Blended Funding:** Pool funds from different sources into a single pot, reducing administrative burden and supporting integrated service delivery.

## **Public-Private Partnerships (PPPs)**

**Corporate Partnerships:** Engage businesses in funding prevention, training, and survivor support, especially those in sectors with high trafficking risk (hospitality, transportation, financial services). PPPs can provide direct funding, in-kind support, and expertise for data and technology improvements.

**Employer Engagement:** Incentivize businesses to support survivor employment, job training, and economic empowerment programs, leveraging tax credits or recognition programs.

## **Non-Traditional and Innovative Funding Models**

Social Impact Bonds / Pay-for-Success

- **How It Works:** Private investors provide upfront capital for evidence-based programs (e.g., training, housing, data systems). The government repays investors only if agreed-upon outcomes are achieved, shifting financial risk away from taxpayers.
- **Benefits:** Proven at scale in social services, these models attract private capital, drive accountability, and support innovation without burdening beneficiaries.



### Social Enterprise and Fee-for-Service

- **Social Enterprises:** Nonprofits or coalitions operate mission-aligned businesses (e.g., thrift stores, training centers), using profits to fund survivor services and training. This model has been used globally to support reintegration and long-term care.
- **Fee-for-Service:** Agencies contract with government or private entities to deliver training, technical assistance, or evaluation services, generating unrestricted revenue.

### Impact Investing and Social Finance

- **Impact Investing:** Directs private capital to businesses and social enterprises that prioritize anti-trafficking outcomes, such as survivor employment, ethical supply chains, or technology for data collection. Investors seek both social and financial returns, and this model is growing in the anti-trafficking field.
- **Social Finance Mechanisms:** Microfinance, community lending, and digital finance tools can support survivor economic empowerment and program sustainability.

### Crowdfunding and Individual Donor Cultivation

- **Crowdfunding Platforms:** Mobilize community support for specific projects (e.g., training modules, data upgrades) through trusted platforms, ensuring transparency and broad engagement.
- **Major Donor and Foundation Partnerships:** Cultivate relationships with local, national, and international foundations committed to anti-trafficking, child welfare, and social justice.

### **Policy and Legislative Alignment**

- **Code of Virginia Updates:** Recent legislative changes support the creation of dedicated funds, matching grants, and certification systems for service providers, enabling more flexible and sustainable funding.
- **CAPTA Compliance:** Funding models must support mandatory reporting, multidisciplinary collaboration, and data system improvements to maintain eligibility for federal grants.
- **National Guidance:** All models align with federal recommendations for diversified, sustainable funding, cross-sector collaboration, and survivor-centered approaches.

**Table 11** provides an overview of the funding models most applicable to VDSS' human trafficking mission.

**Table 11: Funding Model Comparisons**

| Model/Source                 | Scalability | Sustainability | Political/Legal Alignment | Burden on Taxpayers | Notes/Examples                        |
|------------------------------|-------------|----------------|---------------------------|---------------------|---------------------------------------|
| State Dedicated Funds        | High        | High           | Strong (Code of VA)       | Moderate            | VA Prevention of Sex Trafficking Fund |
| Federal Grants (VOCA, CAPTA) | Moderate    | Variable       | Required (CAPTA)          | Low                 | VOCA, OVC, DOJ                        |
| Braided/Blended Funding      | High        | High           | Strong                    | Low-Moderate        | Used in many states                   |
| PPPs/Corporate Partnerships  | High        | High           | Strong                    | Low                 | UNODC PPP Compendium                  |
| Social Impact Bonds          | Moderate    | High           | Strong                    | Low                 | Pay-for-Success pilots                |
| Social Enterprise            | Moderate    | High           | Strong                    | None                | Profits fund services                 |
| Impact Investing             | Moderate    | High           | Strong                    | None                | Eagle Freedom Fund, JVI               |
| Crowdfunding/Donors          | Moderate    | Variable       | Strong                    | None                | Project-based                         |

### **Funding Model Goals and Actions**

The overarching funding strategy seeks to secure a diverse portfolio of resources that can sustain trauma-informed and survivor-centered initiatives across Virginia. By aligning short-, mid-, and long-term funding priorities with the broader implementation roadmap, the plan ensures that financial investments directly support programmatic goals identified in earlier sections. A key objective is to reduce dependence on one-time grants by leveraging braided and blended funding approaches that combine federal entitlements, state appropriations, and public-private partnerships. This strategy also embeds funding considerations into continuous quality improvement (CQI) processes, allowing the Commonwealth to monitor outcomes, adjust allocations based on data, and maintain a resilient financial framework that evolves with emerging needs and best practices. Phased funding actions to consider include:

#### **Short-Term (0–12 months)**

- **Consolidate and map funding streams** currently available across state agencies (e.g., VOCA, Title IV-E, CAPTA) and align them with immediate priorities (training standardization, CCWIS development, mobile crisis response pilots).
- **Develop funding guidance for local MDTs** to ensure equitable access to available grants and appropriations, particularly in rural or underserved areas.
- **Initiate PPP outreach** with survivor-led organizations, healthcare systems, and philanthropic entities to support housing and mentorship pilot programs.

- **Integrate funding metrics into implementation oversight** (see Section 1.2.5.5 on Monitoring and Success Indicators).

#### **Mid-Term (1–3 years)**

- **Establish a blended funding model** combining federal entitlements (VOCA, RHYA) with state general funds for long-term housing and wraparound services.
- **Legislatively pursue Medicaid waivers** to expand behavioral health coverage for trafficked youth (cross-reference: Long-Term Support Services 1.2.4).
- **Expand state-level matching funds** to incentivize localities and nonprofits to participate in statewide training collaboratives (cross-reference: Training 1.2.3).
- **Formalize funding oversight roles** within the Statewide Human Trafficking Commission to align budgets with CQI insights.

#### **Long-Term (3–5 years)**

- **Institutionalize a dedicated Anti-Trafficking Survivors Fund** as part of the state budget to ensure sustainable investment beyond grant cycles.
- **Integrate funding planning into statewide data dashboards** (cross-reference: Data Gap Analysis 1.2.2) to track resource allocation, service uptake, and outcome equity.
- **Scale PPPs and philanthropic contributions** to sustain survivor mentorship and housing models proven effective in pilot phases.
- **Evaluate and refine funding strategy** every three years to adapt to legislative changes, emerging needs, and evolving best practices.

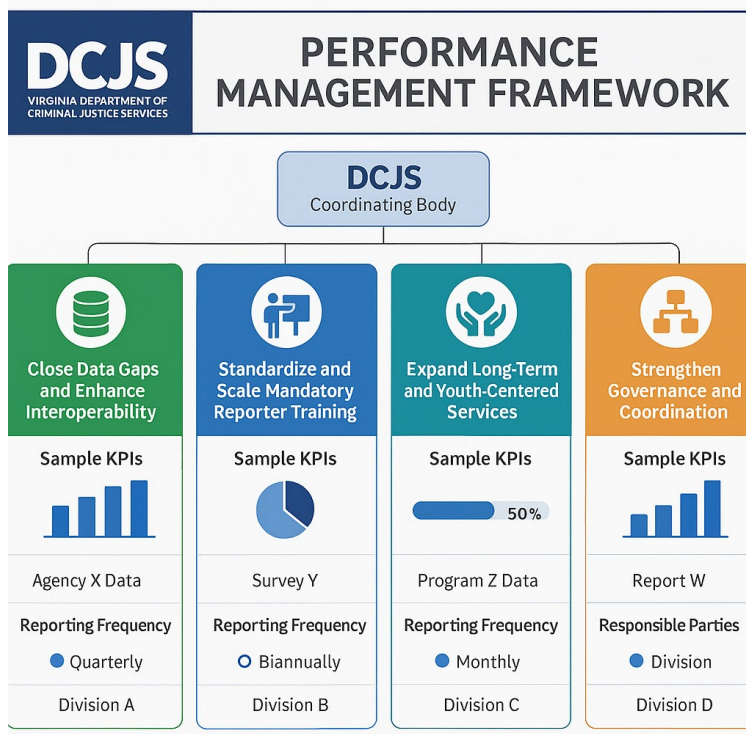
**Table 12: Funding Matrix**

| <b>Funding Source</b>       | <b>Applicable Initiatives</b>                          | <b>Lead Entity</b>                | <b>Timeline</b>  |
|-----------------------------|--------------------------------------------------------|-----------------------------------|------------------|
| VOCA Grants                 | Statewide training, youth housing, victim services     | DCJS / VDSS                       | Short & Mid-Term |
| Title IV-E                  | CCWIS development, foster care and case management     | VDSS                              | Short & Mid-Term |
| CAPTA Funds                 | Mandatory reporter training, data system modernization | VDSS                              | Short-Term       |
| Medicaid Waivers            | Behavioral health, long-term trauma-informed care      | VDSS / DMAS                       | Mid to Long-Term |
| RHYA Grants                 | Transitional living programs, mobile crisis teams      | VDSS / Nonprofits                 | Mid-Term         |
| State Appropriations        | Sustained MDT operations, survivor council activities  | General Assembly                  | All phases       |
| Public-Private Partnerships | Survivor-led mentorship, housing expansion             | DCJS / Faith & Community Partners | Mid to Long-Term |

Sustaining the funding strategy requires a multi-layered approach that blends recurring state appropriations with federal grant programs to ensure continuity of services beyond individual funding cycles. By embedding financial oversight within the Commission governance structure (see Section 1.2.5.6), the Commonwealth can align funding decisions with statewide priorities and ensure equitable resource distribution across urban and rural regions. Braided funding models—combining federal, state, and philanthropic contributions should be prioritized to maximize flexibility while maintaining compliance with federal reporting requirements. Continuous quality improvement (CQI) processes will play a critical role in evaluating cost-effectiveness and adapting funding allocations based on real-time data. This feedback loop allows Virginia to respond to emerging needs, legislative changes, and evolving best practices, ensuring that the funding framework remains responsive, resilient, and centered on the long-term well-being of trafficking survivors.

#### **1.2.5.5 Monitoring, Evaluation, and Success Indicators**

Successful implementation of the roadmap requires a structured performance management framework led by DCJS, with delegated responsibilities to partner agencies including VDSS, VDOE, DBHDS, Virginia State Police, and nonprofit collaborators. DCJS, as the centralized coordinating body, should establish Key Performance Indicators (KPIs) tied to each initiative and broader youth-centered outcomes, ensuring alignment with the roadmap’s four strategic goals: closing data gaps, scaling mandatory reporter training, expanding long-term services, and strengthening governance.



**Figure 4: Example Dashboard for Success Indicators**

KPIs should be **initiative-specific and outcome-oriented**. For example:

- **Data system integration (Policy/Administrative):** Percentage of CCWIS–VSDCS interoperability milestones achieved; number of agencies contributing to centralized data dashboards.
- **Mandatory reporter training (Policy/Administrative):** Number and percentage of mandated reporters trained; training completion rates by sector (education, child welfare, law enforcement); post-training knowledge gains.
- **Youth-centered service expansion (Administrative/Legislative):** Increase in available trauma-informed housing placements; percentage of youth receiving wraparound support within 30 days of identification; service satisfaction ratings from survivors.
- **Governance and coordination (Policy/Legislative):** Commission meeting frequency; cross-agency participation rates; number of adopted statewide protocols and MOUs.

Data to track these indicators should be drawn from existing systems (CCWIS, VSDCS, LEDRS) and supplemented by standardized reporting from regional MDTs, nonprofit service providers, and the Commission itself. Quarterly reporting to the Commission will enable rapid course corrections, while annual public reporting will demonstrate transparency and progress to the General Assembly and the Governor’s office. DCJS should manage a centralized dashboard that visualizes performance trends and supports decision-making, with VDSS responsible for child welfare data contributions, VDOE for school-based metrics,

DBHDS for behavioral health outcomes, and nonprofits for survivor service feedback. This coordinated tracking structure ensures that implementation remains data-driven, responsive to emerging needs, and accountable to the Commonwealth's priorities of efficiency, safety, and responsible investment.

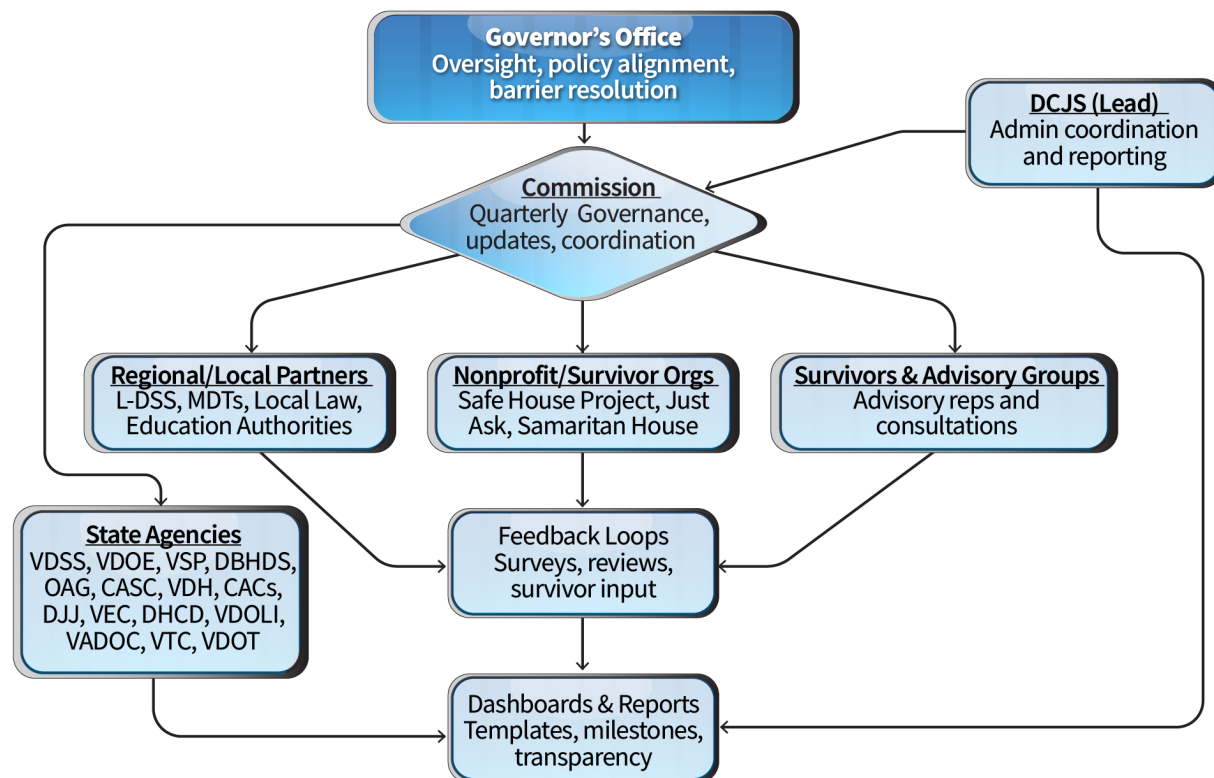
**Table 13: KPI Framework**

| <b>Strategic Goal</b>                             | <b>Sample KPI's</b>                                                                                                                                                                                                                                      | <b>Data Source(s)</b>                                               | <b>Reporting Frequency</b>                               | <b>Responsible Party</b>                                                        |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------|
| Close Data Gaps and Enhance Interoperability      | <ul style="list-style-type: none"> <li>• % completion of CCWIS–VSDCS integration milestones</li> <li>• Number of agencies contributing to centralized dashboards</li> <li>• Reduction in duplicate records across systems</li> </ul>                     | CCWIS, VSDCS, LEDRS, Commission reporting                           | Quarterly internal; Annual public                        | DCJS (lead); VDSS (data management); VSP (law enforcement data)                 |
| Standardize and Scale Mandatory Reporter Training | <ul style="list-style-type: none"> <li>• % of mandated reporters trained by sector (education, child welfare, law enforcement)</li> <li>• Training completion rate within required timeline</li> <li>• Average knowledge gains (pre/posttest)</li> </ul> | Training portal data; DCJS training records; Partner agency reports | Quarterly internal; Annual aggregate reporting           | DCJS (lead); VDOE (schools); VDSS (child welfare)                               |
| Expand Long-Term and Youth-Centered Services      | <ul style="list-style-type: none"> <li>• Increase in trauma-informed housing placements</li> <li>• % of youth receiving wraparound support within 30 days of identification</li> <li>• Survivor satisfaction ratings (service feedback)</li> </ul>       | CCWIS; MDT service tracking; Nonprofit provider reports             | Quarterly performance reviews; Annual outcome evaluation | VDSS (lead service coordination); DBHDS (behavioral health); Nonprofit partners |
| Strengthen Governance and Coordination            | <ul style="list-style-type: none"> <li>• Commission meeting frequency and attendance</li> </ul>                                                                                                                                                          | Commission minutes; Governance                                      | Biannual Commission updates;                             | DCJS (lead); Commission co-                                                     |

| Strategic Goal | Sample KPI's                                                                                                                                               | Data Source(s)           | Reporting Frequency     | Responsible Party     |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------|-----------------------|
|                | <ul style="list-style-type: none"> <li>• Number of adopted statewide protocols/MOUs</li> <li>• Cross-agency participation rate in MDT protocols</li> </ul> | reports; DCJS monitoring | Annual public reporting | chairs; Regional MDTs |

### 1.2.5.6 Roles, Responsibilities, and Governance

Implementation of the roadmap will require a phased oversight structure that balances executive leadership, operational expertise, and survivor-informed input while transitioning responsibilities as the Statewide Centralized System (SCS) and Statewide Human Trafficking Commission mature. During the stand-up phase, the VDSS and DCJS should serve as co-leads, leveraging their complementary strengths: VDSS brings deep expertise in child welfare systems and service delivery, while DCJS provides the foundation for future administrative leadership and established training and data coordination functions. The Governor's Office should serve in an administrative support role, providing high-level visibility, policy alignment, and facilitation to overcome interagency barriers and secure cross-state collaboration during this critical start-up period.



**Figure 5: Proposed Governance Model**

This joint leadership structure is essential to establish governance charters, secure multi-agency participation, finalize survivor representation mechanisms, and align funding commitments from both state and federal sources. Once the centralized system and Commission are fully operational, targeted for the end of the short-term phase (within 12 months), leadership should transition to DCJS as the sole administrative lead, with VDSS continuing as a primary partner on child welfare-related initiatives and the Governor's Office shifting to an oversight and policy advocacy role.

The Commission will function as the enduring oversight body, including representation from VDSS, VDOE, DBHDS, Virginia State Police, survivor leaders, and nonprofit partners such as Safe House Project and Samaritan House. This body will set statewide priorities, review progress against KPIs, and validate policy and legislative recommendations. Implementation leads for each major initiative (e.g., data integration, mandatory reporter training, youth services) should be designated from the appropriate agencies and provide quarterly updates to the Commission, supplemented by biannual executive reviews with the Governor's Office to maintain alignment with budget cycles and policy priorities.

**Coordination protocols** should include:

- **Quarterly reporting** to the Commission via a centralized KPI dashboard to track implementation milestones and outcomes.
- **Biannual executive-level briefings** with the Governor's Office to address barriers and align with legislative and budget timelines.
- Continuous input from **survivor advisory groups** to ensure trauma-informed, youth-centered implementation.
- Formation of **cross-agency workgroups** (data, training, services) to operationalize initiatives, manage dependencies, and accelerate problem-solving during rollout.

This phased co-leadership approach embeds expertise from the outset, leverages executive influence to overcome systemic barriers, and ensures a seamless handoff to DCJS for long-term administrative oversight, maintaining accountability and coordination across Virginia's multi-agency response to youth trafficking.

#### ***1.2.5.7 Risk Management and Mitigation***

Effective implementation of this strategic plan requires proactively identifying and managing risks that could delay or dilute impact. The cross-sector and multi-agency nature of Virginia's human trafficking response introduces a range of operational, political, and funding-related risks—particularly during the stand-up of the Statewide Centralized System (SCS) and the launch of the Statewide Human Trafficking Commission. By establishing a shared risk management protocol and incorporating adaptive project management practices, Virginia can increase transparency, maintain momentum, and avoid fragmentation across partners and phases.



The Commission should maintain a living implementation risk register and assign risk owners for each major initiative. Risks should be assessed by both probability (likelihood of occurrence) and impact (degree to which the risk affects timeline, quality, or outcomes) and tracked alongside mitigation and contingency plans. Ongoing risk monitoring should be embedded into quarterly reporting cycles and biannual executive reviews to ensure timely escalation and response. This structured approach aligns with Virginia’s priorities for efficient government, fiscal stewardship, and public safety, ensuring that challenges are addressed early and do not undermine critical reforms.

**Table 14: Key Anticipated Risks and Mitigation Strategies**

| <b>Risk</b>                                                                                                                                             | <b>Probability/Impact</b>          | <b>Mitigation Strategy</b>                                                                                                                         | <b>Contingency Plan</b>                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| Funding Delays or Shortfalls – Delays in securing federal or state appropriations for CCWIS upgrades, training rollout, or long-term service expansion. | Medium probability / High impact   | Align implementation phases with Virginia’s biennial budget cycle; prioritize scalable pilots; leverage braided funding (VOCA, CAPTA, Title IV-E). | Adjust timeline, narrow initial scope, pursue public-private partnerships or grant opportunities.         |
| Cross-Agency Coordination Challenges – Differing priorities and operational cultures across state agencies (VDSS, DCJS, VDOE, DBHDS).                   | High probability / High impact     | Establish clear governance protocols, quarterly coordination meetings, and defined workgroup roles under Commission oversight.                     | Engage Governor’s Office to mediate barriers; escalate unresolved issues to executive review.             |
| Data Integration Barriers – Technical or legal barriers to integrating CCWIS, VSDCS, LEDRS, and other systems.                                          | Medium probability / High impact   | Conduct early legal and technical assessments; establish standardized data-sharing agreements; phase integration to manage complexity.             | Utilize interim manual reporting protocols while technical fixes or legislative changes are pursued.      |
| Training Participation and Compliance Gaps – Mandated reporters may not complete training or apply it effectively.                                      | Medium probability / Medium impact | Implement automated tracking via training portal; integrate training into professional licensure/renewal; provide incentives for completion.       | Require targeted make-up sessions; conduct spot audits; reassign training resources to high-need regions. |
| Turnover in Key Staff or Leadership – Changes in agency leadership or Commission membership disrupting continuity.                                      | Medium probability / Medium impact | Maintain documented governance charters, onboarding protocols, and cross-training to preserve institutional knowledge.                             | Assign deputies for key roles; use Commission to re-establish priorities if leadership changes occur.     |

| Risk                                                                                                                        | Probability/Impact                 | Mitigation Strategy                                                                                                                 | Contingency Plan                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Stakeholder Fatigue / Engagement Decline – Overburdened local agencies or nonprofits disengage due to competing priorities. | Medium probability / Medium impact | Build engagement plans with clear value propositions; stagger asks; incorporate survivor and frontline input to maintain relevance. | Rotate workgroup membership; provide recognition or stipends for sustained participation. |

### 1.2.5.8 Stakeholder Engagement and Communications

Effective implementation of this strategic plan depends on clear, consistent communication among stakeholders and a structured feedback process that fosters transparency, incorporates survivor perspectives, and avoids duplicative reporting burdens. Key stakeholders will be critical for the engagement process. Possible participants include:

- **State agencies:** Virginia Department of Criminal Justice Services (DCJS), Virginia Department of Social Services (VDSS), Virginia Department of Education (VDOE), Virginia State Police (VSP), and Department of Behavioral Health and Developmental Services (DBHDS).
- **Governor’s office:** Provides executive oversight, policy alignment, and barrier resolution support during stand-up and ongoing review cycles.
- **Regional and local partners:** Local Departments of Social Services, law enforcement, multidisciplinary teams (MDTs), and local education authorities.
- **Nonprofit and survivor-led organizations:** Safe House Project, Samaritan House, Just Ask Prevention, and other community-based organizations with direct survivor engagement.
- **Survivors and advisory councils:** Formal survivor advisory group and ad hoc survivor input mechanisms integrated into governance and program design.

Communication methods should leverage existing channels, quarterly Commission meetings, targeted workgroup updates, secure data dashboards, and annual public reporting, to ensure efficiency and minimize new administrative demands. Feedback loops should be built into these existing structures: survivors and frontline providers contribute insights via advisory group sessions and structured surveys, while agencies provide updates on data and implementation milestones through the Commission reporting cadence.

To maintain transparency without overburdening partners, reporting requirements should prioritize actionable data and qualitative insights over high-volume outputs, using shared templates and dashboards for consistency. Survivors’ voices should be elevated through advisory group representation on the Commission and periodic consultations during key implementation milestones (e.g., training content review, data system design). This approach

ensures continuous alignment between strategic goals, frontline realities, and survivor-centered priorities, even within limited funding and staffing constraints.

#### *1.2.5.9 Review and Continuous Improvement*

Sustained success of this implementation roadmap depends on its ability to remain adaptive and responsive to shifting conditions, including evolving stakeholder needs, changes in political priorities, fluctuations in funding streams, and resource constraints. To achieve this, the roadmap should be governed by a continuous improvement cycle anchored in regular review and iterative updates rather than a static implementation plan. The Commission, under the administrative leadership of DCJS, should oversee this cycle, ensuring recommendations remain relevant, feasible, and aligned with Virginia's strategic objectives for combating human trafficking.

Review cycles should occur quarterly at the Commission level, using performance dashboards to track progress against Key Performance Indicators (KPIs) and identify emerging risks or bottlenecks. In addition, biannual executive reviews with the Governor's Office will provide opportunities to recalibrate priorities to align with budget cycles, legislative developments, and broader state initiatives. These reviews should also include an assessment of survivor and frontline feedback, drawn from advisory groups, stakeholder surveys, and qualitative input from local MDTs and nonprofit partners.

The continuous improvement process should prioritize lightweight, actionable reporting to avoid burdening partners with limited resources, focusing on trend analysis, major milestones, and outcome measures that directly inform decision-making. When gaps or misalignments are identified, whether due to policy shifts, funding delays, or operational challenges, the roadmap should allow for real-time course corrections through updated work plans, re-sequenced priorities, or temporary pilot adaptations. This iterative approach ensures that the roadmap remains flexible and sustainable, protecting its core mission: to deliver coordinated, trauma-informed, and survivor-centered services that evolve with the needs of Virginia's youth and communities.

# APPENDIX 1 – SUMMARY OF RECOMMENDATIONS

## DATA RECOMMENDATIONS

### ***Data Recommendation 1. Formalize and Expand Cross-Agency Data Sharing and Case Coordination***

**Action:** Leverage Virginia’s new [Commonwealth Data Trust](#) (CDT) and recent legislative mandates to rapidly onboard all relevant state and local agencies, including law enforcement, child welfare, education, behavioral health, and victim services, into a unified, secure, and legally compliant data-sharing framework. Develop and implement standardized agreements and protocols to facilitate real-time exchange of information, integrated case management, and coordinated service delivery. These efforts should be seamlessly aligned with existing platforms and requirements for any new or modernized systems within the state, such as OASIS (soon to be Comprehensive Child Welfare Information System or “CCWIS”), VSDCS, and others. The CDT is a secure, multi-stakeholder data exchange and analytics platform established under Virginia Code § 2.2-203.2:4 (2023). It enables data sharing under uniform security, privacy, and confidentiality rules among state, regional, local agencies, and higher education institutions; and is managed by the Office of Data Governance and Analytics (ODGA). Data Trust Members include agencies such as Virginia Department of Health, Social Services, Corrections, local police departments, and higher education institutions, who collectively sign Data Trust Agreements and agree to governance participation. CDT serves as a solid foundational element to underpin a statewide centralized system by providing a pathway to eliminate multiple ad-hoc data-sharing pipelines by providing a single, standardized environment, reducing technical complexity and costs via NIEM-based protocols (shared language and rulebook). ODGA launched the Commonwealth Data Trust Portal. Agencies can use the portal to join the Data Trust, view and manage agreements, and request access to datasets via Role-Based Access with Okta, a secure access management, two-factor authentication protocol, at no cost to participants.

**Why It Matters:** This initiative will break down long-standing data silos, enabling faster, more consistent, and coordinated responses across systems. It strengthens Virginia’s ability to identify trafficking cases early, ensure appropriate referrals, and provide holistic, trauma-informed care. Enhanced data integration also supports Child Abuse Prevention and Treatment Act (CAPTA) compliance, aligns with recent state legislation requiring multidisciplinary collaboration, and ensures that no survivor falls through the cracks due to fragmented information systems.

**Sustainability:** A robust, standardized data infrastructure empowers the Commonwealth to drive ongoing system evaluation, monitor service outcomes, and make data-informed decisions around resource allocation and policy development. Embedding these practices supports continuous quality improvement, enhances interagency accountability, and positions Virginia as a national leader in coordinated, survivor-centered responses to human trafficking.

### ***Data Recommendation 2. Standardize Data Elements and Reporting Protocols***

**Action:** Establish and implement a standardized set of data fields, definitions, and reporting protocols for all human trafficking cases and related service responses across agencies, leveraging CDT portal to facilitate agreements.

**Why it Matters:** Consistent data standards, field types, and definitions are essential to improving the quality, accuracy, and interoperability of information collected across systems. Standardization enables agencies to “speak the same language,” allowing for more effective data comparison, aggregation, and analysis. This condition is expected to have contributed to some of the complications that resulted in the discontinuation of the VAST platform; and would be an impediment to future efforts to aggregate data and information related to human trafficking in the long term. The potential value and return on investment for this action not only benefits human trafficking improvements but could improve awareness and capacity for many related needs across the state; and facilitates the identification of service gaps, supports evidence-based policy development, and creates the ability to enhance coordination with national data systems. Ultimately, it strengthens Virginia’s ability to respond strategically and cohesively to human trafficking across the continuum of care.

**Sustainability:** Long-term sustainability of standardized data elements and reporting protocols will require embedding these standards into statewide data governance frameworks and operational policies across child welfare, law enforcement, and victim services agencies. The Statewide Human Trafficking Commission, under DCJS administrative leadership, should oversee ongoing updates to standards as federal reporting requirements, trafficking trends, and technology platforms evolve. Integration with core systems such as CCWIS, VSDCS, and Kin First Now will ensure consistency across data collection points and reduce duplication of effort.

### ***Data Recommendation 3. Continue Funding for the Development, Implementation, & Sustainment of CCWIS***

Virginia is in the process of replacing its aging OASIS platform with the Comprehensive Child Welfare Information System (CCWIS), a modernized, federally compliant solution designed to improve case management, data integration, and service coordination for child welfare programs. This transition is critical for addressing long-standing gaps in data quality, interoperability, and real-time reporting that currently hinder the Commonwealth’s ability to identify and respond effectively to human trafficking cases. By fully funding and sustaining CCWIS beyond its initial development, Virginia can ensure that the system not only meets federal compliance requirements, but also supports a unified, survivor-centered approach across child welfare, law enforcement, education, and health sectors. Sustained investment will allow for continuous enhancements, statewide training, and alignment with evolving best practices in trauma-informed and youth-focused care.

**Action:** Secure and prioritize multi-year funding to complete the development and statewide rollout of CCWIS, including system integration with related data platforms (e.g., VSDCS, LEDRS, Kin First Now, and the Commonwealth Data Trust). Allocate resources for ongoing system maintenance, user training, and continuous upgrades to support emerging legislative requirements, enhanced reporting capabilities, and interoperability with national anti-trafficking data systems. Establish a dedicated governance structure within VDSS to oversee implementation, ensure stakeholder engagement, and coordinate periodic system evaluations for quality improvement.

**Why it Matters:** Continuing investment in CCWIS ensures Virginia can retire legacy systems that currently impede data sharing and comprehensive case tracking for trafficked youth. A fully functional CCWIS will provide a single, reliable source of truth for child welfare data, reduce reporting errors, and enable real-time coordination among agencies. This modernization is essential for early identification of trafficking victims, closing service gaps, and improving outcomes by linking survivors to the right supports at the right time. Moreover, CCWIS will strengthen Virginia's compliance with federal mandates, position the Commonwealth to leverage additional federal funding, and build a sustainable infrastructure that adapts to evolving best practices in child protection and anti-trafficking work.

**Sustainability:** Sustainability for CCWIS requires both financial and operational planning to ensure the system remains effective beyond its initial implementation. Virginia should establish a dedicated funding line within the state budget that supports ongoing maintenance, user training, and future enhancements tied to policy changes and emerging best practices. Leveraging braided funding streams, including federal Title IV-E funds, CAPTA allocations, and potential public-private partnerships, will reduce reliance on one-time appropriations and provide flexibility to address evolving system needs. Incorporating continuous quality improvement (CQI) processes will ensure CCWIS remains aligned with frontline realities and survivor-centered approaches, while periodic evaluations and stakeholder feedback loops will maintain system relevance and performance over time.

#### ***Data Recommendation 4. Conduct Comprehensive Review of Data Systems and Sources***

While this strategic plan identifies key data gaps and opportunities for integration, further work is needed to fully understand the breadth and functionality of all systems and databases across state agencies and non-state partners that contain human trafficking-related information. A comprehensive review would ensure Virginia captures the full spectrum of available data, evaluates data quality and interoperability, and identifies opportunities to streamline or modernize platforms to support a coordinated statewide response. This assessment is essential for developing a holistic understanding of the data landscape and ensuring that future investments in data modernization, such as CCWIS and VSDCS enhancements, are effectively targeted and aligned with statewide priorities.

**Action:** Initiate a structured review of all data systems and sources that contain human trafficking-related data across state agencies (e.g., VDSS, DCJS, VDOE, VSP, DBHDS) and relevant non-state organizations (e.g., nonprofits, advocacy networks, national hotlines). The

review should map current data flows, identify overlaps and gaps, and evaluate opportunities for integration or modernization in alignment with future CCWIS and VSDCS capabilities. Deliverables should include a comprehensive data inventory, recommendations for standardized data elements, and prioritized opportunities for cross-agency interoperability.

**Why it Matters:** A thorough understanding of the current data ecosystem is foundational to improving case coordination, measuring statewide outcomes, and informing resource allocation. By identifying all relevant data sources, both within and outside of government, Virginia can create a more accurate, survivor-centered picture of human trafficking trends and service needs. This effort will also inform policy and funding decisions, ensuring investments in data modernization (e.g., CCWIS) are targeted and avoid redundancy.

**Sustainability:** A comprehensive review of Virginia's data systems and sources with relevant human trafficking data should be institutionalized as an ongoing function of the Statewide Human Trafficking Commission rather than a one-time activity. Establishing a central data inventory maintained by DCJS and updated annually will ensure the state can rapidly identify new data sources and assess integration opportunities as programs evolve. Reviews should be embedded into biennial strategic planning cycles and incorporate survivor and community partner input to keep findings relevant and actionable. This living data inventory will reduce redundancy, highlight emerging trends, and inform funding decisions for modernization efforts over time. Leverage braided funding (VOCA, Title IV-E, CAPTA) and existing interagency data initiatives to minimize costs and maintain alignment with Virginia's enterprise data strategy.

#### ***Data Recommendation 5. Integrate State Systems with National and Cross-Sector Platforms***

**Action:** Develop and implement the necessary technical and legal infrastructure to integrate future aggregated data sets from state systems with key national data sources including the National Human Trafficking Hotline, Human Trafficking Reporting System (HTRS), and the National Center for Missing & Exploited Children (NCMEC), well as relevant state-level systems such as child welfare and healthcare databases.

**Why it Matters:** Seamless data integration will empower Virginia to benchmark its performance against national trends, contribute to broader analyses, and more effectively track victims and cases across state lines. This interoperability strengthens cross-jurisdictional coordination, enhances real-time decision-making, and increases access to critical federal resources. By aligning with national systems, Virginia positions itself as a leader in evidence-based, data-driven responses to human trafficking.

**Sustainability:** Long-term sustainability for integrating Virginia's state systems with national and cross-sector platforms hinges on building this work into the second phase of the Statewide Centralized System (SCS) and Commission's operations, after internal state data alignment has been achieved. Leveraging existing enterprise frameworks such as the Commonwealth Data Trust (CDT) will minimize the need for new infrastructure while ensuring compliance with statewide privacy and security standards.

Ongoing governance by the Commission should include a standing data integration subcommittee responsible for maintaining technical and legal agreements, ensuring interoperability with evolving national platforms like the National Human Trafficking Hotline, HTRS, and NCMEC. Integration should follow a **phased approach**—initially prioritizing de-identified or aggregate data exchanges to support benchmarking and trend analysis, then expanding to real-time case coordination where permitted. Sustained value will depend on periodic CQI reviews to confirm that these national linkages improve cross-jurisdictional awareness, enhance victim identification, and justify resource commitments over time.

### ***Data Recommendation 6. Establish a Continuous Quality Improvement (CQI) Program***

**Action:** Launch a comprehensive statewide Continuous Quality Improvement (CQI) initiative to routinely audit data quality, ensure adherence to reporting standards, and deliver standardized, ongoing training for all data contributors and mandatory reporters.

**Why it Matters:** Effective cross-agency collaboration and meaningful system improvements require high-quality, consistent, and ethically collected data. A robust CQI framework ensures that data remains accurate, actionable, and responsive to emerging trends. Regular audits and training create a culture of accountability and learning—equipping the workforce with the knowledge and tools to collect, interpret, and use data responsibly. These efforts will close information gaps, reduce reporting inconsistencies, and ensure compliance with evolving standards.

**Sustainability:** For long-term success, the Continuous Quality Improvement (CQI) program should be embedded within the Statewide Centralized System (SCS) and overseen by the Human Trafficking Commission with DCJS as the administrative lead. Rather than building new structures from scratch, Virginia should leverage existing statewide data frameworks and governance efforts, such as the Commonwealth Data Trust (CDT) and related cross-agency data initiatives, to streamline implementation, reduce duplication, and ensure alignment with broader enterprise data strategies.

CQI processes should include regular analysis of system performance, case outcomes, and service gaps, drawing from both state-managed systems (e.g., CCWIS, VSDCS, Kin First Now) and de-identified partner data from nonprofits and local agencies. Findings from these reviews should feed directly into quarterly Commission reports and biennial budget planning cycles, allowing for targeted policy and programmatic adjustments in real time. Incorporating survivor and frontline feedback into this cycle will ensure continuous improvements remain trauma-informed and relevant to lived experiences, while the use of existing frameworks like CDT will support sustainable interoperability and long-term data integrity without requiring significant new infrastructure investments.

## **TRAINING RECOMMENDATIONS**

Virginia's mandatory reporter training framework represents one of the most critical opportunities to improve early identification and intervention for children and youth



impacted by human trafficking. Current training efforts delivered by agencies such as the Department of Criminal Justice Services (DCJS) and supported by non-profit partners including Safe Harbor, Samaritan House, Safe House Project, Just Ask Prevention, offer a strong starting point but are limited by fragmentation, inconsistent content, and uneven accessibility across regions. Federal guidance, such as the SOAR to Health and Wellness Training from the U.S. Department of Health & Human Services and best practices from the Office for Victims of Crime (OVC), underscore that training must be recurring, interactive, and trauma-informed, with clear attention to youth developmental stages and culturally responsive practices. Incorporating survivor-informed content is equally essential, ensuring professionals not only recognize trafficking indicators but also respond in ways that reduce re-traumatization, prioritize safety, and connect youth to appropriate support systems.

As Virginia expands the scope of mandated reporters and strengthens multidisciplinary team (MDT) responses, there is a critical need to **standardize training statewide** and **align it with national best practices**. The recommendations that follow outline strategies to build a sustainable, high-quality training infrastructure that can be scaled across diverse settings schools, healthcare systems, law enforcement, local health departments, and child welfare agencies. These strategies include adopting proven frameworks like SOAR, implementing train-the-trainer models to expand reach, and integrating continuous quality improvement (CQI) processes to monitor impact and adapt content over time. Collectively, these measures will ensure all professionals, regardless of geography or discipline, share a common understanding of trafficking dynamics, are equipped to act consistently and appropriately, and contribute to a coordinated, survivor-centered response across the Commonwealth.

### **Training Recommendation 1. Virginia Department of Criminal Justice Services – Human Trafficking Education, Training and Awareness**

The Virginia Department of Criminal Justice Services (DCJS) has created and continue to facilitate several comprehensive human trafficking training programs administered both via E-Learning and In-person to include the following:

- E-Learning Courses:
  - Human Trafficking 101
  - Human Trafficking Awareness Training for Hotels
  - Human Trafficking Awareness Training for Colleges
- In-Person Courses:
  - Human Trafficking Identification for Criminal Justice and First Responders
  - Human Trafficking Investigation and Prosecution
  - SETTS: Sexual Exploitation Treatment and Training Services

While trainings can be facilitated both virtually and/or in-person, the sheer volume of trainings that would need to occur to ensure all mandated reporters, non-mandated

providers, community members and youth in the state of Virginia exceeds what the DCJS training team could support. As a result, key recommendations include the following:

- Expand the DCJS training team – provide funding for one (1) additional staff person to address the human trafficking training needs of the state of Virginia
- Develop a Train-the-Trainer program – a train-the-trainer program could streamline the training process and increase the number of mandated reporters and non-mandated providers that need to receive human trafficking training to ensure victims (both youth and adults) can be properly identified and connected with immediate and long-term services and resources. Human Trafficking Regional Coordinators would participate in the DCJS Train-the-Trainer program to then provide approved trainings in their region of the state.
  - Human Trafficking Regional Coordinators would be identified to ensure the entire state is covered. Their tasks would include not only connecting victims and survivors with services and resources in their region of the state but also facilitate various levels of human trafficking trainings for providers and community members.
  - To ensure the successful implementation of this initiative the following components must be identified and regulated by the DCJS training team:
    - Identify the skills, knowledge, and competencies required of trainers
    - Set clear, measurable goals for what trainers should know and be able to do; align objectives with organizational goals and learner needs
    - Develop structured modules or topics for trainer instruction
    - Create trainer manuals, participant guides, slide decks, and handouts
    - Prepare evaluation tools (pre/post tests to measure knowledge gains)
    - Outline expectations for trainer performance
    - Prepare trainer performance assessments during and after the program
    - Provide refresher trainings or booster sessions for trainers
    - Budget and resource allocation

### **Training Recommendation 2. SOAR to Health and Wellness Training Framework**

The SOAR (Stop, Observe, Ask, Respond) framework is a nationally recognized, trauma-informed, and culturally responsive training program developed by the U.S. Department of Health and Human Services. It is designed for professionals across health care, behavioral health, public health, education, and social services, sectors that frequently encounter trafficking victims, especially youth. Key features include:

- Trauma-Informed and Survivor-Centered: Emphasizes understanding trauma, minimizing re-traumatization, and empowering survivors.

- **Cross-Sector Applicability:** Modules are tailored for health care, behavioral health, education, and social service professionals, making it ideal for Virginia's multidisciplinary response needs.
- **Cultural and Linguistic Responsiveness:** Training is available in English and Spanish and addresses the needs of diverse populations.
- **Flexible Delivery:** Offers in-person, virtual, and on-demand options, supporting both urban and rural implementation.
- **Evidence-Based Content:** Covers identification of trafficking indicators, trauma responses, reporting protocols, and resource navigation.
- **Alignment with Best Practices:** Incorporates scenario-based learning, case studies, and practical tools for real-world application.

#### **Why Appropriate for Virginia:**

- **Scalable and Customizable:** Can be adopted statewide and adapted to local contexts, including integration with Virginia's existing Department of Social Services and Department of Education training resources.
- **Supports Mandated Reporter Training:** Addresses current gaps in recognizing youth behavioral cues and trauma indicators.
- **Politically Feasible:** Already recognized by federal agencies and compatible with Virginia's current legal and policy environment.

#### **Training Recommendation 3. Statewide Multidisciplinary Learning Collaborative Model**

This model builds upon the proven **Community-Based Learning Collaborative (CBLC)** approach, which has successfully advanced the large-scale implementation of trauma-informed practices in other states. It convenes professionals from child welfare, law enforcement, education, healthcare, and community organizations to engage in shared, ongoing training and quality improvement initiatives. The goal is to foster a unified, trauma-informed response across systems through the following components:

- **Cross-Agency, Multidisciplinary Training:**  
Regular joint sessions for mandated reporters and frontline staff to build a shared understanding of human trafficking dynamics, strengthen collaboration, and break down silos between agencies.
- **Trauma-Informed Core Curriculum:**  
Utilizes evidence-based tools such as the NCTSN Child Welfare Trauma Training Toolkit and foundational TF-CBT modules, with a specific focus on recognizing youth-specific trauma, behavioral indicators, and red flags for trafficking.
- **Interactive, Scenario-Based Learning:**  
Reinforces practical skills through real-world case studies, peer learning, and role-

playing exercises, helping participants apply knowledge with confidence in high-stakes situations.

- **Continuous Quality Improvement:**

Integrates follow-up coaching, peer consultation, and ongoing performance monitoring to ensure that best practices are sustained, refined, and responsive to emerging needs.

- **Statewide System Integration:**

Designed for alignment and coordination with Virginia's Department of Criminal Justice Services, Department of Social Services, and local multidisciplinary teams to support long-term scalability and system-wide consistency.

Together, these elements create a powerful, scalable framework to equip Virginia's workforce with the tools, language, and shared vision necessary to effectively prevent, identify, and respond to human trafficking.

### **Why This Model Is Well-Suited for Virginia:**

- **Addresses Regional Disparities:**

Promotes equitable access to trauma-informed training by facilitating knowledge-sharing and capacity-building in rural, underserved, and resource-constrained areas across the Commonwealth.

- **Supports Policy and Practice Alignment:**

Establishes consistent standards, language, and protocols across systems, helping to close existing gaps in training content, delivery, and interagency coordination.

- **Builds on Existing Infrastructure:**

Leverages Virginia's mandated multidisciplinary response teams and aligns with ongoing statewide efforts to standardize protocols, enhance interagency collaboration, and strengthen trauma-informed systems of care.

### **Implementation Considerations:**

- **Mandate and Incentivize Participation:**

Require annual or biennial completion of training for all mandated reporters and frontline personnel. Offer incentives or recognition for agencies demonstrating high rates of participation and compliance.

- **Embed Within Existing Systems:**

Integrate training frameworks into onboarding processes, professional development plans, and continuing education requirements for sectors such as child welfare, education, law enforcement, and healthcare.

- **Evaluate and Evolve:**

Utilize data from Virginia's data systems to track training outcomes, assess impact,

and refine content based on emerging trends, field feedback, and evolving best practices.

**Table 5: Framework Comparison**

| Framework                                | Core Strengths                                   | Virginia-Specific Benefits                        |
|------------------------------------------|--------------------------------------------------|---------------------------------------------------|
| SOAR to Health and Wellness              | Nationally recognized, trauma-informed, flexible | Scalable, cross-sector, addresses training gaps   |
| Multidisciplinary Learning Collaborative | Interactive, cross-agency, ongoing improvement   | Builds collaboration, standardizes best practices |

#### **Training Recommendation 4. Develop a Statewide Training Framework for Virginia Human Trafficking Response**

**Action:** Establish a hybrid statewide training framework that integrates the nationally recognized SOAR to Health and Wellness model with a multidisciplinary learning collaborative approach tailored to Virginia’s needs. This framework should provide consistent, trauma-informed, and survivor-centered training for all mandated reporters and frontline professionals, including educators, healthcare providers, law enforcement, child welfare staff, and allied community members. Training should be delivered through a hybrid model (in-person, virtual, and on-demand), incorporate scenario-based learning, and be informed by survivor perspectives.

To ensure scalability, the framework should include a train-the-trainer program that equips regional coordinators and local partners (including nonprofits such as Safe Harbor, Samaritan House, and Safe House Project) to deliver approved content, expanding reach across urban and rural areas while maintaining fidelity to state standards. This framework must explicitly include the Virginia Department of Education (VDOE) and local school systems in curriculum design and delivery, ensuring that teachers, counselors, nurses, and administrators receive targeted training aligned with their mandated reporting responsibilities and roles in multidisciplinary teams (MDTs).

**Why it Matters:** Creating a standardized statewide training framework ensures all professionals, across child welfare, healthcare, law enforcement, and education, share a common understanding of human trafficking indicators, reporting obligations, and trauma-informed response practices. While Virginia has made progress in training frontline staff, education stakeholders remain a critical but underutilized resource in prevention and early intervention efforts.

Local school systems are uniquely positioned to identify and respond to trafficking because they maintain daily contact with children and adolescents, often recognizing changes in behavior, attendance, or academic performance that may indicate exploitation. Teachers, counselors, nurses, and administrators are mandated reporters under Virginia law, yet many lack access to comprehensive training on trafficking indicators, proper reporting protocols,

and trauma-informed engagement. Without this foundation, opportunities for early identification and support may be missed.

Integrating education personnel into the statewide training framework will also strengthen **multi-disciplinary response teams (MDTs)** by ensuring schools contribute critical insight into a child's academic, social, and emotional context. This coordinated approach enables more holistic interventions, supports continuity in education, and connects vulnerable students to services without disruption to their academic trajectory. Prioritizing training for educators will not only improve reporting accuracy but also embed trafficking prevention and response into **everyday school practices**, amplifying statewide capacity to protect at-risk youth.

**Sustainability:** To ensure long-term impact, the training framework should be embedded into professional development and continuing education requirements across child welfare, education, healthcare, and criminal justice sectors. DCJS will maintain statewide oversight of mandatory reporter training, validate curriculum quality and ensure consistency across agencies, while leveraging nonprofits such as Safe House Project, Safe Harbor, and Samaritan House to expand delivery capacity and increase the frequency of training statewide.

Collaboration between VDOE, local school systems, VDSS, and DCJS should be formalized through Memoranda of Understanding (MOUs) that outline joint responsibilities for training, reporting protocols, and referral pathways. This structure will help schools integrate trafficking prevention into daily practice, ensuring continuity of care and academic stability for at-risk students.

Sustainability will also rely on braided funding (e.g., CAPTA, VOCA, Title IV-E, state appropriations) and a Continuous Quality Improvement (CQI) loop that uses standardized metrics, survivor input, and data from systems like CCWIS and VSDCS to adapt training content over time. By institutionalizing these partnerships and practices, Virginia can maintain a coordinated, trauma-informed, and survivor-centered training framework that evolves with statewide priorities and emerging best practices.

### **Training Recommendation 5. Standardize and Pilot Trauma-Informed Protocols and Training**

**Action:** Design and implement a pilot program featuring standardized, trauma-informed, and youth-centered protocols and training modules for multidisciplinary teams in select regions. Require active participation from all core agencies, including child welfare, law enforcement, healthcare, and education, and ensure the content comprehensively addresses the identification, referral, and support of trafficked youth.

**Why it Matters:** Piloting these protocols establishes a consistent foundation for early identification and coordinated response, while creating space for real-time feedback, local adaptation, and continuous improvement. It ensures all team members are aligned in language, approach, and responsibilities when working with at-risk or trafficked youth.

**Sustainability:** This phased, evidence-informed approach lays the groundwork for a scalable, survivor-centered model that can be adopted statewide. Piloting not only enhances quality and efficacy but also builds early buy-in across agencies, demonstrates measurable outcomes, and accelerates Virginia’s readiness for successful system-wide implementation.

### **Training Recommendation 6. Expand and Standardize Trauma-Informed Training for Youth-Serving Professionals**

**Action:** Launch a comprehensive statewide initiative to deliver mandatory, recurring trauma-informed training for all professionals who interact with youth, including educators, healthcare providers, social service personnel, and law enforcement officers. The training should be interactive and scenario-based, with a focus on identifying trafficking-specific behavioral cues, recognizing trauma indicators, and following appropriate, survivor-centered referral protocols.

**Why It Matters:** This initiative directly addresses current inconsistencies in the identification and response to youth trafficking. It aligns with recent updates to the Code of Virginia, which expand the scope of mandated reporters, and fulfills CAPTA (Child Abuse Prevention and Treatment Act) workforce training requirements. National best practices underscore the need for regular, hands-on training to equip professionals with the skills to intervene early and respond without causing further harm.

**Sustainability:** By embedding this training into existing professional development and continuing education requirements, Virginia can ensure long-term capacity-building, reinforce trauma-informed values across systems, and drive a statewide culture shift toward proactive, coordinated, and compassionate responses to trafficking.

### **Training Recommendation 7. Assign DCJS as Lead for Statewide Mandatory Reporter Training Oversight**

Given its statutory authority, existing training infrastructure, and designated role as administrative lead for the proposed Statewide Centralized System and Commission, the Virginia Department of Criminal Justice Services (DCJS) should serve as the primary entity responsible for overseeing statewide mandatory reporter training on human trafficking. DCJS is best positioned to establish and maintain standardized training curricula, ensure alignment with trauma-informed and survivor-centered best practices, and manage quality assurance across agencies and disciplines. To maximize reach and leverage subject matter expertise, DCJS should coordinate closely with the Virginia Department of Social Services (VDSS) to integrate child welfare mandates and CCWIS data protocols; the Virginia Department of Education (VDOE) to embed training within educator and school personnel professional development; the Virginia Department of Health (VDH), and the Department of Behavioral Health and Developmental Services (DBHDS) to address behavioral health and trauma indicators; and other stakeholders where their mission role is a priority (ex. VDOT awareness notices at airports, etc.). Nonprofit and survivor-led organizations, including Safe House Project, Safe Harbor, and Samaritan House, should be engaged through a

train-the-trainer model to expand delivery capacity, especially in rural and underserved regions, and to ensure survivor-informed content is incorporated. Oversight of this coordinated training framework should rest with a Commission Training Subcommittee, chaired by DCJS and co-chaired by VDSS, to establish curriculum standards, monitor statewide implementation, and guide continuous quality improvement. This structure ensures all mandated reporters—across education, healthcare, law enforcement, and child welfare—receive consistent, high-quality training that supports early identification, coordinated response, and improved outcomes for trafficked youth across the Commonwealth.

## LONG-TERM AND YOUTH (LTY)–SPECIFIC RECOMMENDATIONS

### **LTY Recommendation 1. Expand Youth-Specific, Trauma-Informed Housing and Support Services Statewide**

**Action:** Invest in the development and statewide expansion of dedicated, long-term housing options for trafficked youth, including specialized shelters, transitional living programs, and host homes. These housing models must be paired with comprehensive, trauma-informed wraparound services, such as mental health care, educational support, legal advocacy, and economic empowerment resources.

**Why It Matters:** Virginia currently faces critical gaps in safe, youth-specific housing and holistic care for survivors of trafficking. Without stable, developmentally appropriate options, many young people are left vulnerable to re-exploitation. National best practices and **CAPTA guidance** emphasize the importance of survivor-centered environments that prioritize safety, healing, and long-term stability. Expanding these services statewide not only addresses geographic inequities but also reinforces Virginia’s legislative commitment to recognizing trafficked youth as victims in need of protection—not punishment.

**Sustainability Strategy:** To ensure long-term impact, Virginia should pursue a **blended funding model**—leveraging state resources, braided federal funding streams (e.g., VOCA, RHYA, Medicaid), and innovative **public-private partnerships**. This approach reduces dependence on short-term grants, builds local ownership, and supports the creation of a robust, sustainable continuum of care.

The state of Virginia could benefit from existing national human trafficking programs that focus on survivor housing, services and education that include addressing the needs of youth human trafficking victims. The Safe House Project is a national anti-trafficking organization headquartered in Virginia Beach, Virginia, dedicated to increasing identification of human trafficking victims in the United States and providing safe, restorative housing for survivors, with a distinct focus on youth and child trafficking survivors. Without a secure, supportive environment, survivors face a heightened risk of re-exploitation, homelessness, and long-term trauma. To address this need, the Safe House Project operates and supports a comprehensive housing model that includes long-term shelter services, transitional program services, and a



national housing certification program, with particular emphasis on youth survivors of sex trafficking.

To expand safe housing and ensure high standards of care, the Safe House Project developed a Housing Certification Program focused especially on youth trafficking survivors.

Program highlights include:

- Establishing national best practice standards
- Certifying safe houses that meet trauma-informed care benchmarks
- Training staff in youth-centered practices
- Expanding the network of qualified housing providers
  - Current housing providers in Virginia looking to expand their residential housing offerings could seek the Safe House Certification to build credibility with existing and future donors, foundations and government agencies. In addition, the Safe House Project provides funding to organizations that serve trafficking survivors and could prove to be a much-needed funding resource for service providers in Virginia.

## **LTY Recommendation 2. Establish a Statewide Survivor Council**

**Action:** Establish a **formal statewide Survivor Council** to serve as a formal advisory body within the Commission, with voting rights on survivor-specific recommendations but not administrative decisions. Infusing lived experience leaders into the framework of the Commission will ensure relevant and consistent, structured input into program design, policy development, training initiatives, and continuous quality improvement efforts at both the state and regional levels, that considers service needs from the survivor's perspective.

**Why It Matters:** Meaningful survivor engagement is not only a cornerstone of national best practices and CAPTA compliance, but also essential to ensuring services are trauma-informed, culturally responsive, and aligned with the real-world needs of those they are designed to support. Centering the voices of individuals with lived experience strengthens system accountability, uncovers hidden barriers, sparks innovation, and ensures that policies and programs are survivor-centered, not just survivor-informed.

**Sustainability Strategy:** By embedding survivor leadership within formal governance structures, Virginia can ensure that survivor perspectives remain central and influential as policies, practices, and systems evolve. Institutionalizing this council supports long-term relevance, equity, and responsiveness—transforming survivor input from one-time feedback into ongoing, empowered leadership.

## **LTY Recommendation 3. Implement a Statewide Centralized System (SCS) Including a Statewide Human Trafficking Commission**

To strengthen statewide multi-agency collaboration in addressing human trafficking, Virginia should implement a centralized, coordinated system.

The permanent Statewide Human Trafficking Commission, which shall serve as the governance authority for the Commonwealth's centralized multi-agency collaboration system on human trafficking. The system shall be administered by the Department of Criminal Justice Services (DCJS) in coordination with state agencies, the statewide survivor council, and community partners.

### **Governance Structure and Principles**

The Commission shall:

1. Function as the statewide governance authority overseeing policy, data integration, interagency coordination, and performance tracking.
2. Operate under a survivor-centered, trauma-informed, culturally responsive framework, explicitly prohibiting criminalization of victims.
3. Include survivor representatives or survivor-led organizations as voting members, constituting at least 25% of voting rights.
4. Include representatives from DCJS, VDSS, the Office of Attorney General, law enforcement (VSP and local), VDH, VDOE, and others as determined.
5. DCJS shall serve as administrative lead, implementing the system under Commission direction; decision-making authority rests with the Commission.

### **Reporting and Accountability**

The Commission and DCJS shall:

1. Define measurable outcomes for service coordination, data sharing, survivor well-being indicators.
2. Submit an annual report to the Governor and General Assembly annually.
3. Hold quarterly public briefings and maintain a publicly accessible dashboard.
4. Recommend any modifications to appropriations or statutory authority.

### **LTY Recommendation 4. External Funding and Sustainability**

It is recommended DCJS be authorized to pursue federal and private funding to supplement state funds. All external funding acceptance and use must be approved by the Commission, including the Survivor Council, ensuring alignment with governance principles. Such funding shall not override Commission oversight.

The proposed model would clearly delineate roles and responsibilities across state and local partners and leveraging Memorandum of Understanding (MOU) and the CDT; and should include the Office of the Attorney General, Virginia Department of Social Services (VDSS), Virginia State Police (VSP), Commonwealth's Attorneys, Virginia Department of Education (VDOE), Virginia Department of Health (VDH), Department of Behavioral Health and Developmental Services (DBHDS), Children's Advocacy Centers (CACs), healthcare systems, nonprofit providers, and survivor leaders. A formal governance structure would be

established, consisting of a statewide Steering Committee, regional multidisciplinary teams (MDTs), and a Survivor Council to embed survivor input in all decision-making and quality improvement efforts.

All participating agencies would provide aggregate, anonymized data to a unified statewide platform. The platform would use standardized data fields and metrics to track overall service access, outcomes, training compliance, and equity indicators, not individual case details. No personally identifiable information (PII) would be collected or shared, and the system would be designed in full compliance with applicable federal and state confidentiality laws (including HIPAA, VOCA, and relevant Virginia statutes). The system would include robust confidentiality protections, incorporate continuous quality improvement processes, and require annual public reporting to promote transparency and system-wide learning without compromising victim privacy.

Statewide adoption of uniform, trauma-informed protocols would be mandated, alongside recurring, interactive training for all mandatory reporters and frontline staff. Training would be standardized and scenario-based, with a focus on youth behavioral cues, trauma responses, the intersectionality of support needs, and trafficking-specific dynamics.

The Survivor Council would serve as a core component of governance, ensuring survivor voices guide policy, training design, and quality assurance at both the state and regional levels. The model includes clear performance metrics for system capacity, service delivery, survivor engagement, and equity, with regular evaluation to inform policy, funding, and continuous improvement.

An example of successful statewide multi-agency collaboration is Florida's direct-support organization, the Florida Alliance to End Human Trafficking. This nonprofit supports the Statewide Council on Human Trafficking through appropriated funds from the state's General Revenue Fund. It facilitates survivor engagement through speaking opportunities, promotes the Survivor Bill of Rights, and coordinates training and awareness programs across law enforcement, hospitality, healthcare, and education sectors. The organization also centralizes resources, publications, and training materials for agencies and nonprofits involved in anti-trafficking efforts.

Supported by the Alliance, the Statewide Council on Human Trafficking comprises 15 entities, including DCG, FDLE, DOH, DJJ, AHCA, DOE, and legislative appointees. It oversees regional task forces and coalitions to advance cross-sector collaboration and best practice sharing statewide.

Initially funded with a \$250,000 appropriation in FY2019–2020 and an additional \$500,000 in FY2022–2023, the Alliance continues its work through state and federal grants. In partnership with the USF TIP Lab, it leverages data for strategic proposals and program evaluations. The Alliance also issues grant funding to law enforcement agencies for technology upgrades and continuing education.

A similar nonprofit structure in Virginia could promote continuity and capacity, especially for administering matching grants and sustaining multi-agency efforts. For example, the Safe

House Project employs a Survivor Support Team approach of working with healthcare providers, advocates, and law enforcement to help victims exit trafficking and begin their journey to healing and independence. In addition, the Safe House Project has a robust offering of online training for a variety of audiences. Some courses are at no cost while others for professionals' range in cost. Examples of training include:

- OnWatch Training – helps the public identify human trafficking victims
- Academic Healthcare Training – learn to identify and respond to human trafficking
- Healthcare Training (2.0 hrs.) and Healthcare Training (1.0 hrs.)
- In-Home Service Providers training
- Just Ask Prevention Curriculum – human trafficking prevention curriculum to educate youth
- TRAP (Trafficking Resistance, Awareness, and Prevention) – school-based program that partners with SROs (Student Resource Officers) to create a direct line of defense to actively protect and prevent children from becoming victims of human trafficking

As previously stated, the Safe House Project would act as a certifying and referral hub for safe housing programs statewide, ensuring quality standards, trauma-informed care, and survivor placement pathways; and leverage Samaritan House of Virginia as the regional anchor model provider within the SCS and as Commission member to managing direct service delivery (emergency housing, case management, legal advocacy, children's services) to prototype delivery in Hampton Roads and where feasible expand deployment across state regions.

Strategically leveraging these organizations would strengthen Virginia's capacity to support survivors of human trafficking and enhance statewide coordination.

**Safe House Project**, a national nonprofit headquartered in Virginia, specializes in expanding and certifying safe housing programs for trafficking survivors and provides large-scale training on trafficking identification and response. Their expertise in establishing national standards, certifying programs, and coordinating survivor placement could be applied to help Virginia identify gaps in safe housing capacity, develop quality assurance standards for programs, and create statewide referral protocols for emergency and long-term housing.

**Samaritan House**, a regional leader in Hampton Roads, operates a comprehensive network of emergency and permanent housing, wraparound support services, and trauma-informed programming for individuals and families affected by domestic violence, sexual assault, human trafficking, and homelessness. Their integrated approach to survivor care, including crisis response, legal advocacy, counseling, and child-specific supports, positions them as a model for regional service delivery and a vital partner in scaling effective practices statewide.

**Safe Harbor**, a regional leader in the Richmond area, provides services to human trafficking victims and survivors that is trauma-informed individual and group counseling in English and Spanish for women, men, and teen human trafficking survivors; emergency and transitional

housing for adult human trafficking; and community outreach and education to include businesses, places of worship, middle and high schools (prevention) and community groups.

By embedding these organizations within the centralized system as lead organizations in the Commission, Virginia could align Safe House Project as a certification and placement hub while designating Samaritan House and Safe Harbor as regional anchor providers, ensuring both national standards and local expertise are reflected in service delivery. Through shared data and coordinated case management, the centralized system could provide real-time insight into statewide service availability, outcomes, and emerging needs.

Safe House Project could lead a workgroup focused on housing certifications and placement, leveraging its national insights to guide system design and expansion. Samaritan House and Safe Harbor could lead or co-lead direct services and survivor support workgroups, ensuring statewide recommendations reflect the realities of local service delivery and the intersections of trafficking with other forms of violence.

Additionally, the Commonwealth could combine these organizations' expertise to inform the design and expand capacity to deliver **mandatory reporter training**. Safe House Project's scalable national programs can support funding, as well as standardized awareness and recognition content (specifically where housing is concerned), while Samaritan House and Safe Harbor can contextualize training to address co-occurring domestic and sexual violence and provide localized referral pathways. Together, this partnership could enable both virtual and in-person training delivery, reaching professionals in education, healthcare, law enforcement, and child welfare across the state.

This dual-leverage approach, combining Safe House Project's national reach and housing expertise with Samaritan House's and Safe Harbor's regional service model and wraparound supports, would allow Virginia to establish a survivor-centered, scalable system that aligns with best practices, maximizes existing capacity, and strengthens coordination through the centralized system and Commission framework.

**Table 9: State-Level Leadership and Coordination, Roles & Responsibilities**

| Stakeholder                                                   | Roles & Responsibilities                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Governor's Executive Order<br>Commission on Human Trafficking | Establishes statewide priorities for minors                                                                                                                                                                                                                                                      |
| DCJS (Lead Agency)                                            | Convene and coordinate system; aggregate relevant funding data for CSC activities across stakeholders; oversee data collection and reporting; ensure compliance; and availability of quality training for mandatory reporters                                                                    |
| Department of Social Services<br>(VDSS)                       | Child welfare response; case management                                                                                                                                                                                                                                                          |
| Office of the Attorney General<br>(OAG)                       | Legal guidance; prosecution support; policy leadership; interagency agreements; management of federally funded initiatives: <ul style="list-style-type: none"> <li>Improving Outcomes for Minors Grant Initiative</li> <li>Integrated Services for Minor Victims of Human Trafficking</li> </ul> |

| Stakeholder                                                      | Roles & Responsibilities                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Office of the Children's Ombudsman                               | Provides oversight to ensure systems of care meet vulnerable minors' needs                                                                                                                                                                                                                                                                                        |
| Virginia State Police (VSP) & Local Law Enforcement              | Investigate cases; refer victims; participate in multidisciplinary teams; data sharing; Operation Silence Shattered to identify trafficking networks                                                                                                                                                                                                              |
| Commonwealth's Attorneys Services Council (CASC)                 | Prosecutorial training; case review; legal strategy coordination                                                                                                                                                                                                                                                                                                  |
| Department of Education (VDOE)                                   | School-based prevention; training for educators; referral protocols; data sharing                                                                                                                                                                                                                                                                                 |
| Department of Behavioral Health & Developmental Services (DBHDS) | Behavioral health services; crisis intervention; mobile response teams                                                                                                                                                                                                                                                                                            |
| Virginia Department of Health (VDH)                              | Public health approach; victim identification; health and human service capacity building; education and training for healthcare providers, educators, etc.; public awareness campaigns; and regulation of the training of overnight lodging facilities (hotels, motels, and bed and breakfasts)                                                                  |
| Child Advocacy Centers (CACs)                                    | Forensic interviews; trauma-informed care; multidisciplinary case review                                                                                                                                                                                                                                                                                          |
| Nonprofit & Community-Based Organizations                        | Survivor services (housing, legal aid, peer mentorship, economic empowerment); outreach; survivor engagement; support capacity building for training                                                                                                                                                                                                              |
| Survivor Leaders/Council                                         | Program and policy input; training development; quality improvement; peer mentorship                                                                                                                                                                                                                                                                              |
| Health Care Systems                                              | Trauma-informed medical/mental health care; screening; referral; data sharing and health related data collection                                                                                                                                                                                                                                                  |
| Local Government (e.g., DSS, CSBs)                               | Local coordination; service delivery; participation in multidisciplinary teams                                                                                                                                                                                                                                                                                    |
| Virginia Department of Transportation                            | Transportation infrastructure management; placement and maintenance of human trafficking awareness signage at rest areas and welcome centers; provide transportation-related data (e.g., high-risk corridors) to task forces; coordinate with law enforcement during investigations; support prevention and awareness campaigns targeting transportation networks |
| Virginia Employment Commission (VEC)                             | Workforce development; job placement and training programs for survivors; unemployment benefits guidance; collaboration with MDTs and nonprofits to connect survivors to economic empowerment resources.                                                                                                                                                          |
| Department of Juvenile Justice (DJJ)                             | Juvenile detention screening and referral; trauma-informed rehabilitation; data sharing with MDTs; coordination with courts and community programs for diversion and support of trafficked youth.                                                                                                                                                                 |
| Virginia Department of Housing and Community Development (DHCD)  | Safe and transitional housing grants; coordination of housing resources for survivors; integration of anti-trafficking priorities into homelessness prevention and rapid-rehousing programs.                                                                                                                                                                      |
| Virginia Department of Labor and Industry (DOLI)                 | Enforcement of labor laws; identification and referral of labor trafficking cases; education and training for employers and                                                                                                                                                                                                                                       |

| Stakeholder                                | Roles & Responsibilities                                                                                                                                                                      |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            | workers; collaboration with MDTs on workplace trafficking indicators.                                                                                                                         |
| Virginia Department of Corrections (VADOC) | Screening for trafficking indicators within correctional populations; referral for victim services; coordination with parole/probation officers to support reentry for trafficking survivors. |
| Virginia Tourism Corporation (VTC)         | Public awareness campaigns in hospitality and travel sectors; training support for tourism partners (hotels, events); coordination with VDOT and DCJS on signage and prevention messaging.    |

While DCJS brings valuable resources and authority to statewide coordination, no single entity alone can manage human trafficking and without robust checks and balances. Justice system actors often default to punitive responses when addressing youth involved in trafficking, particularly in environments where protocols and training are inconsistent or where oversight from child welfare and survivor advocacy sectors is limited.

Despite recent legislative reforms, significant statutory gaps persist, especially in vacatur laws and diversion protocols, which means that youth can still be charged or detained for offenses directly related to their exploitation. This concern is amplified by Virginia's and other states' historical precedent of criminalizing exploited youth. Shifting away from this deeply embedded pattern requires intentional, structural safeguards to ensure that vulnerable young people are treated as victims in need of support, not as offenders subject to further harm by the justice system. There is a legitimate risk that justice system priorities could overshadow the needs and rights of trafficked youth.

Embedding statutory protections, multidisciplinary governance, survivor leadership, trauma-informed protocols, and transparent data practices, such as those in **Table 10**, are essential to ensure that Virginia's response remains victim-centered, developmentally appropriate, and aligned with both state law and national best practices for child trafficking.

**Table 10: Recommended Checks & Balances**

| Safeguard                          | Purpose                                   | Example Implementation                                           |
|------------------------------------|-------------------------------------------|------------------------------------------------------------------|
| Safe Harbor Laws                   | Prevent prosecution of trafficked youth   | Statutory prohibition, mandatory diversion                       |
| Survivor Council                   | Ensure survivor voice and oversight       | Policy review, case audits                                       |
| Child Welfare/Health Co-Leadership | Balance justice with welfare perspectives | Dual agency leadership                                           |
| Independent Ombudsperson           | Provide external accountability           | Case investigations, complaints process                          |
| Trauma-Informed Protocols/Training | Standardize non-criminal response         | Statewide, recurring, scenario-based                             |
| Data Transparency                  | Monitor and correct system outcomes       | Public reporting, Continuous Quality Improvement (CQI) processes |

| Safeguard                         | Purpose                              | Example Implementation                      |
|-----------------------------------|--------------------------------------|---------------------------------------------|
| Cross-System MOUs and Case Review | Shared accountability, prevent silos | Formal agreements, multidisciplinary panels |

A robust, statewide multi-agency collaboration system, anchored by DCJS as lead, with clear roles, formal governance, unified reporting, and survivor leadership, will enable Virginia to deliver consistent, trauma-informed, and data-driven support for trafficked youth. This structure aligns with state law, CAPTA, and national guidance, ensuring accountability, sustainability, and improved outcomes for youth survivors and the Commonwealth as a whole.



## APPENDIX 2 – GLOSSARY OF ACRONYMS

| Acronym    | Definition                                                                |
|------------|---------------------------------------------------------------------------|
| A-CRA      | Adolescent Community Reinforcement Approach                               |
| AHCA       | Agency for Healthcare Administration                                      |
| ATEST      | Alliance to End Slavery and Trafficking                                   |
| BRIGHT     | Bridging Resources and Information Gaps in Human Trafficking              |
| CAC        | Children's Advocacy Center                                                |
| CAPTA      | Child Abuse Prevention and Treatment Act                                  |
| CASC       | Commonwealth's Attorney Services Council                                  |
| CBLC       | Community-Based Learning Collaborative                                    |
| CCWIS      | Comprehensive Child Welfare Information System                            |
| CDO        | Chief Data Officer                                                        |
| CDT        | Commonwealth Data Trust                                                   |
| CE         | Continuing Education                                                      |
| CGI        | Consultants to Government and Industry                                    |
| CHJA       | Children's Justice Act Program                                            |
| COMPASS    | Comprehensive Permanency Assessment and Safety System                     |
| CPS        | Child Protective Services                                                 |
| CQI        | Continuous Quality Improvement                                            |
| CSB        | Community Service Board                                                   |
| CSC        | Criminal Sexual Conduct                                                   |
| DBHDS      | Department of Behavioral Health and Developmental Services                |
| DBRA       | Debt Bondage Relief Act                                                   |
| DCF        | (Florida) Department of Children and Families                             |
| DCJS       | Department of Criminal Justice Services                                   |
| DCSE       | Division of Child Support Enforcement                                     |
| DHCD       | Department of Housing and Community Development                           |
| DJJ        | Department of Juvenile Justice                                            |
| DOE        | Department of Education                                                   |
| DOH        | (Florida) Department of Health                                            |
| DOJ        | Department of Justice                                                     |
| DOLI       | Department of Labor and Industry                                          |
| DMAS       | Department of Medical Assistance Services                                 |
| DSS / VDSS | Virginia Department of Social Services                                    |
| ECM        | Enhanced Collaborative Model                                              |
| FDLE       | Florida Department of Law Enforcement                                     |
| HIPPA      | Health Insurance Portability and Accountability Act                       |
| H.O.P.E.   | Healthcare Observations for Prevention & Eradication of Human Trafficking |
| HT         | Human Trafficking                                                         |
| HTRS       | Human Trafficking Reporting System                                        |
| IACP       | International Association of Chiefs of Police                             |
| ICAC       | Internet Crimes Against Children                                          |
| KPI        | Key Performance Indicator                                                 |
| LDSS       | Local Department of Social Services                                       |

| Acronym   | Definition                                                           |
|-----------|----------------------------------------------------------------------|
| LED RS    | Law Enforcement Data Reporting System                                |
| LGBTQ+    | Lesbian, Gay, Bisexual, Transgender, Queer/Questioning and others    |
| LSNV      | Legal Services of Northern Virginia                                  |
| LTY       | Long-Term and Youth-specific (context-specific abbreviation)         |
| MDT       | Multidisciplinary Team                                               |
| MOU       | Memoranda of Understanding                                           |
| MRSS      | Mobile Response Teams                                                |
| MST       | Multisystemic Therapy                                                |
| MYTEI     | Minnesota Youth Trafficking and Exploitation Identification Tool     |
| NCMEC     | National Center for Missing & Exploited Children                     |
| NCTSN     | The National Child Traumatic Stress Network                          |
| NHTTAC    | National Human Trafficking Training and Technical Assistance Center  |
| NIEM      | National Information Exchange Model                                  |
| NVFS      | Northern Virginia Family Services                                    |
| OAG       | Office of the Attorney General                                       |
| OASIS     | Online Automated Services Information System                         |
| ODGA      | Office of Data Governance and Analytics                              |
| OJJDP     | Office of Juvenile Justice and Delinquency Prevention                |
| OLRA      | Office of Legislative and Regulatory Affairs                         |
| OVC       | Office for Victims of Crime                                          |
| OVC TTAC  | Office for Victims of Crime Training and Technical Assistance Center |
| PII       | Personally Identifiable Information                                  |
| PPP       | Public-Private Partnership                                           |
| RHYA      | Runaway and Homeless Youth Act                                       |
| RMS       | Records Management System                                            |
| SAKI      | (Virginia) Sexual Assault Kit Initiative                             |
| SCS       | Statewide Centralized System                                         |
| SEAS      | Screening for Experiences and Strengths                              |
| SEEN      | Support to End Exploitation Now                                      |
| SETTS     | Sexual Exploitation Treatment and Training Services                  |
| SOAR      | Stop, Observe, Ask, Respond (National training framework)            |
| SRO       | Student Resource Officer                                             |
| TF-CBT    | Trauma-Focused Cognitive Behavioral Therapy                          |
| TIP       | Trafficking in Persons                                               |
| TIPSTR    | Trafficking in Persons - Risk to Resilience                          |
| TRAP      | Trafficking Resistance, Awareness, and Prevention                    |
| TVPA      | Trafficking Victims Protection Act                                   |
| UNODC PPP | United Nations Office on Drugs and Crime Public-Private Partnerships |
| USCRI     | U.S. Committee for Refugees and Immigrants                           |
| USF       | University of South Florida                                          |
| UVA       | University of Virginia                                               |
| VADOC     | Virginia Department of Corrections                                   |
| VAST      | Virginia Analytics System for Trafficking                            |
| VCU       | Virginia Commonwealth University                                     |

| Acronym | Definition                                  |
|---------|---------------------------------------------|
| VDH     | Virginia Department of Health               |
| VDOE    | Virginia Department of Education            |
| VDOT    | Virginia Department of Transportation       |
| VEC     | Virginia Employment Commission              |
| VOCA    | Victims of Crime Act                        |
| VSDCS   | Victims Services Data Collection System     |
| VSP     | Virginia State Police                       |
| VTC     | Virginia Tourism Corporation                |
| WHRO    | Public Media Station (mentioned in context) |
| YFT     | Youth For Tomorrow                          |

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144. Figure 1: Current Gaps Identified Through Interviews Visual reflects qualitative insights gathered through confidential interviews with survivors and service providers. Data has been anonymized and aggregated to protect participant identities.