

CF OPERATING PROCEDURE  
NO. 175-14

STATE OF FLORIDA  
DEPARTMENT OF  
CHILDREN AND FAMILIES  
TALLAHASSEE, January 1, 2013

Family Safety

INTAKES AND INVESTIGATIVE RESPONSE TO THE HUMAN TRAFFICKING OF CHILDREN

1. Purpose. This operating procedure describes the special requirements for Intakes and subsequent actions relating to the commercial sexual exploitation of a child, sexual abuse-sexual exploitation, and labor trafficking of children. The operating procedure establishes the roles and responsibilities of Hotline counselors; child protective investigators; contracted community based care providers; and sub-contracted service providers in cases of the human trafficking of children.
2. Scope. This operating procedure applies to Department and contracted provider staff involved in child welfare. The term "Department" includes the Florida Abuse Hotline; Child Protective Investigations within the Department and Sheriff's offices and Community Based Care Lead Agencies with direct contracts to the Department and their sub-contracted service providers.
3. Authority.
  - a. §39.01(15)(g), Florida Statutes (F.S.); §39.01(67)(g), F.S.; §39.201, F.S.; §39.301, F.S.; §39.5075, F.S.; §39.524, F.S.; §409.9531, F.S.; §787.06, F.S.; §796.035, F.S.; and §796.045, F.S.
  - b. 18 U.S.C. §§ 1581, 1584, 1589-1595; and 22 U.S.C. § 7105.
  - c. Trafficking Victims Protection Act of 2000, PL 106-386, 114 Stat. 1464 (Oct. 28, 2000) and the Trafficking Victims Protection Reauthorization Act of 2008, PL 110-457, 122 Stat. 5044 (Dec.23, 2008).
  - d. Immigration and Nationality Act, §101(a)(15)(T) & (U).
  - e. 8 CFR 214.11 (T-Visa) & 8 CFR 214.14 (U-Visa).
  - f. Rules: 65C-9.003, Florida Administrative Code (F.A.C.); 65C-30.003, F.A.C.; 65C-30.007, F.A.C.; and 65C-28-30, F.A.C.
4. Definitions. For the purposes of this operating procedure, the following definitions will apply:
  - a. Commercial Sex Act. Any sex act where anything of value is given to or received by any person.
  - b. Commercial Sexual Exploitation of a Child. The use of any person under the age of 18 for sexual purposes in exchange for money, goods or services or the promise of money, goods or services.
  - c. Debt Bondage. When a person under control of another person promises to pay money owed with his or her labor or through the personal services of a child under his or her control as a security for debt.

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This operating procedure supersedes CFOP 175-14 dated May 1, 2009.

OPR: PDFS

DISTRIBUTION: X: OSEC; OSGC; ASGO; PDFS; PDRS; Regional Managing Directors; Region Family Safety staff.

d. Dependent Child. For the purposes of investigating allegations of Human Trafficking, a child who is found to be dependent includes a child who is found by the court to have been victim of trafficking and to have no parent, legal custodian, or responsible adult relative currently known and capable of providing the necessary and appropriate supervision and care.

e. Force, Fraud or Coercion.

(1) Force involves the use of rape, beatings, confinement and any other actions designed to control victims. Forceful violence is used especially during the early stages of victimization, known as the “seasoning process”, which is used to break victims’ resistance and make them easier to control.

(2) Fraud often involves false offers that induce people into trafficking situations. For example, women and children will reply to advertisements promising jobs as waitresses, maids and dancers. Once they arrive in the United States they are then forced into prostitution or domestic servitude.

(3) Coercion involves threats of serious harm to, or physical restraint of, any person; any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or the abuse or threatened abuse of the legal process.

f. Harboring. To receive or hold a person in a place without legal authority.

g. Immigrant Child. A person under the age of 18 who is not a U.S. citizen.

h. Induced. To lead or move by persuasion.

i. Labor Trafficking. The recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud or coercion, for the purpose of subjecting that person to involuntary servitude, peonage (where someone is held against their will to pay off a debt), debt bondage, or slavery.

j. Non-Governmental Organization Advocate/Agency. Local service agencies and case managers across the country which help victims of Human Trafficking get assistance such as housing, medical care, mental health services and referrals for pro bono legal help. These agencies and personnel are not to be confused with the Community-Based Care Lead Agencies or subcontracted providers used to manage Florida’s dependency system.

k. Recruitment. The process of enlisting or convincing a person to join with another person for a stated purpose.

l. Refugee. A person outside of his or her country of nationality who is unable or unwilling to return because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion.

m. Repatriation. The act of returning to one’s country of origin. In the case of trafficked children, this could also mean reunifying with that child’s family.

n. Safe House. A licensed living environment that has set aside gender specific, separate, and distinct living quarters for sexually exploited children who have been adjudicated dependent or delinquent and need to reside in a secure residential facility with staff members who are awake 24 hours a day.

o. Safe House Assessment. Any comprehensive child assessment that meets all requirements established by s. 39.524(1).

p. Servitude. Slavery; the condition where a person is forced to perform labor or services, against his or her will, by another person.

q. Sexual Abuse-Sexual Exploitation. The use of any person under the age of 18 for sexual purposes in exchange for money, goods, or services where a parent, legal guardian, or caregiver is alleged to be benefiting financially or receiving anything of value from the child's participation in the commercial sex trade.

r. Sexual Exploitation of a Child. The sexual exploitation of a child, which includes the act of a child offering to engage in or engaging in prostitution, provided that the child is not under arrest or is not being prosecuted in a delinquency or criminal proceeding for a violation of any offense in chapter 796 based on such behavior; or allowing, encouraging, or forcing a child to:

- (1) Solicit for or engage in prostitution;
- (2) Engage in a sexual performance, as defined by chapter 827; or,
- (3) Participate in the trade of sex trafficking as provided in s. 796.035.

s. Sex Trafficking. The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

t. Slavery. The condition where a person is forced to perform labor or services, against his or her will, by another person.

u. T Visa. A visa created by the Trafficking Victims Protection Act of 2000 to protect women, children and men who are the victims of human trafficking. The T visa allows victims of severe forms of trafficking in persons to remain in the United States and assist law enforcement in the investigation and prosecution of human trafficking cases. The U.S. Citizenship and Immigration Services grants nonimmigrant status and the U.S. Department of State issues T visas.

v. Trafficked. The state of a person who is or has been a victim of human trafficking.

w. Trafficking or Human Trafficking. Children can be victims of human trafficking regardless of their citizenship, residency, or alien or immigrant status.

(1) Severe form of trafficking in persons (as defined by the TVPA) means:

(a) Sex trafficking in which a commercial sex act is induced by force, fraud or coercion or in which the person induced to perform such act is under 18; or,

(b) The recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud or coercion, for the purpose of subjecting that person to involuntary servitude, peonage (where someone is held against their will to pay off a debt), debt bondage, or slavery.

(2) Human trafficking (State) means the transporting, soliciting, recruiting, harboring, providing, or obtaining another person for transport. It is a crime for any person to knowingly engage, or attempt to engage, in human trafficking with the intent or knowledge that the trafficked person will be

subjected to forced labor or services; or to benefit financially by receiving anything of value from participation in a venture that has subjected a person to forced labor or services.

x. Trafficked. A visa created by the Trafficking Victims Protection Act of 2000 to protect women, children and men who are the victims of criminal activity including sexual exploitation and assault. The U visa allows victims to remain in the United States and assist law enforcement, including certain entities charged with the detection of crimes, in the investigation and prosecution of criminal activity. Children are not required to assist law enforcement in any ongoing investigation to be considered eligible for a U visa status or issuance. The U.S. Citizenship and Immigration Services grants nonimmigrant status and the U.S. Department of State issues U visas.

5. Responsibilities of the Florida Abuse Hotline. The Florida Abuse Hotline shall generate an intake for all cases where a child is an alleged victim of Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse-Sexual Exploitation, or Human Trafficking/Labor Trafficking.

a. Human Trafficking/Commercial Sexual Exploitation of a Child. A report type of In-Home with the maltreatment code of Human Trafficking/Commercial Sexual Exploitation of a Child shall be used in those cases where the allegations appear to involve commercial sexual exploitation of a child (adult entertainment clubs, escort services, prostitution, etc.), and the alleged perpetrator is not considered to be a parent, legal guardian, or caregiver.

(1) Child Not Currently Identified as an Active Victim. If the alleged perpetrator is unknown or is not considered to be a parent, legal guardian, or caregiver and it can be determined that the child is not already residing in the dependency system or the child is currently residing in the dependency system but is not currently identified as being an active victim of commercial sex exploitation of a child within the Florida Safe Families Network (FSFN), take the following action.

(a) All pertinent information will be forwarded to law enforcement in a manner that conforms with all requirements associated with s. 39.201(2), F.S.

(b) A Child Abuse Report shall be created with a report type of In-Home with a maltreatment code of Human Trafficking/Commercial Sexual Exploitation of a Child.

(c) Response priority shall be based upon the results of the safety assessment.

(2) Child Currently Identified as an Active Victim. If the alleged perpetrator is unknown or is not considered to be a parent, legal guardian, or caregiver and it can be determined that the child is already residing in the dependency system and the child is currently identified as being an active victim of commercial sexual exploitation of a child within the Florida Safe Families Network, forward all pertinent information to:

(a) Law enforcement in a manner that conforms to all requirements associated with s. 39.201(2), F.S..

(b) The community based care (CBC) lead-agency that has primary case management responsibility for the child via an internal message contained within the Florida Safe Families Network (FSFN).

b. Sexual Abuse-Sexual Exploitation.

(1) Alleged Perpetrator Appears to be a Parent, Legal Guardian, or Caregiver Not Associated with an Institutional Entity. If the alleged perpetrator is considered to be a parent, legal

guardian, or caregiver that does not appear to be associated with an institutional entity, such as a foster home, group home, school, etc.:

(a) A Child Abuse Report with the report type of In-Home with maltreatment code of Sexual Abuse–Sexual Exploitation shall be created.

(b) Response priority shall be based upon the results of the safety assessment.

(2) Alleged Perpetrator Appears to be a Parent, Legal Guardian, or Caregiver Associated with an Institutional Entity. A report type of Institutional with the maltreatment code of Sexual Abuse–Sexual Exploitation shall be used in those cases where the allegations appear to involve commercial sexual exploitation of a child (adult dancing, escort services, prostitution, etc.), and the alleged perpetrator appears to be a parent, legal guardian, or caregiver that is associated with an institutional entity, such as a foster home, group home, school, etc.

(a) A Child Abuse Report with the report type of Institutional with the maltreatment code of Sexual Abuse–Sexual Exploitation shall be created.

(b) Response priority shall be based upon the results of the safety assessment.

c. Human Trafficking/Labor Trafficking.

(1) A report type of In-Home with the maltreatment code of Human Trafficking/Labor shall be used in those cases where the allegations appear to involve issues associated with labor trafficking, slavery, or servitude that do not appear to be sexual in nature, and the alleged perpetrator is unknown or is not considered to be a parent, legal guardian, or caregiver, or the alleged perpetrator is considered to be a parent, legal guardian, or caregiver that does not appear to be associated with an institutional entity, such as a foster home, group home, school, etc.

(a) If the alleged perpetrator is unknown or is not considered to be a parent, legal guardian, or caregiver:

1. All pertinent information will be forwarded to law enforcement in a manner that conforms with all requirements associated with s. 39.201(2), F.S.

2. A Child Abuse Report shall be created with a report type of In-Home with a maltreatment code of Human Trafficking/Labor.

3. Response priority shall be based upon the results of the safety assessment.

(b) If the alleged perpetrator is considered to be a parent, legal guardian, or caregiver that does not appear to be associated with an institutional entity, such as a foster home, group home, school, etc.:

1. A Child Abuse Report with the report type of In-Home shall be created with the maltreatment code of Human Trafficking/Labor.

2. Response priority shall be based upon the results of the safety assessment.

(2) A report type of Institutional with the maltreatment code of Human Trafficking/Labor shall be used in those cases where the allegations appear to involve issues associated with labor

trafficking, slavery, or servitude that do not appear to be sexual in nature, and the alleged perpetrator is considered to be a parent, legal guardian, or caregiver that appears to be associated with an institutional entity, such as a foster home, group home, school, etc.

(a) A Child Abuse Report with the report type of Institutional shall be created with the maltreatment code of Human Trafficking/Labor.

(b) Response priority shall be based upon the results of the safety assessment.

6. Responsibilities of the Child Protective Investigator. In addition to the directives provided by Chapter 39, F.S. and Florida Administrative Code 65C-29, a child protective investigator will have the following responsibilities associated with allegations of Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse–Sexual Exploitation, or Human Trafficking/Labor Trafficking:

a. If Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse–Sexual Exploitation, or Human Trafficking/Labor is one of the maltreatment codes contained within an abuse report or the child protective investigator suspects that a child might be a victim of trafficking at any time throughout the course of an investigation, the investigator must immediately:

(1) Initiate all local child protective investigative response procedures and protocols associated with a possible allegation of Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse–Sexual Exploitation, or Human Trafficking/Labor.

(2) Contact the appropriate county sheriff or other law enforcement agency, including federal law enforcement authorities for the purposes of determining if:

(a) Law enforcement is going to accept the case for criminal investigation.

(b) Law enforcement and the child protective investigative entity are going to conduct a coordinated investigation as directed per s. 39.301(2)(c), F.S.

(c) In those cases where law enforcement does not accept the case for criminal investigation or proceeds with an independent investigation, the child protective investigator shall document these decisions within the Florida Safe Families Network (FSFN).

(3) Initiate a multidisciplinary staffing that shall include, but not be limited to, a representative from the community based care lead-agency, Children's Legal Services, knowledgeable victim advocates, and the Refugee Services Program Office's Anti-Trafficking Coordinator in those cases where a foreign national victim is involved.

(4) In those cases where the maltreatment codes of Human Trafficking/Commercial Sexual Exploitation of a Child and/or Human Trafficking/Labor are suspected but not contained within the active abuse report and the alleged perpetrator is unknown or is not considered to be a parent, legal guardian, or caregiver, the Child Protective Investigator shall immediately contact the Florida Abuse Hotline for the purposes of ensuring that all law enforcement notification requirements associated with s. 39.201(2), F.S. are met.

(5) If the maltreatment codes of Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse–Sexual Exploitation, or Human Trafficking/Labor have not been selected within the active abuse report, the Child Protective Investigator shall add the appropriate maltreatment codes to the report.

b. When investigating Human Trafficking/Commercial Sexual Exploitation of a Child, Sexual Abuse–Sexual Exploitation, or Human Trafficking/Labor Trafficking cases child protective investigators should focus their efforts on determining:

(1) The legal connection of any individual claiming to be a parent, relative, caregiver, or legal custodian to the child. In many cases traffickers will present themselves as a parent, relative, caregiver, or legal custodian.

(2) The possible involvement of any confirmed parent, relative, caregiver, or legal custodian in the trafficking of the child.

(3) The capability of any confirmed parent, relative, caregiver, or legal custodian to provide the necessary and appropriate level of supervision and care.

(4) Ensure that any information related to any person that might possibly be involved in the trafficking of any individual is provided to the appropriate law enforcement for possible criminal investigation.

c. Special care should be given to the placement of child who is suspected to be a victim of human trafficking with a parent, relative, caregiver or legal custodian until there is a clear determination that the person in question is not a trafficker or allied with the trafficker.

7. Responsibilities of the Community Based Care Lead Agencies and Other Service Providers for Assessment, Placement, and Services for Commercial Sexual Exploitation or Human Trafficking Victims.

a. Community based care lead agencies and their contracted service providers are required to design and deliver services that meet the unique needs of possible and confirmed victims of commercial sexual exploitation that are residing within the foster care system.

b. In addition to the provisions of s. 409.1678, F.S., such a contract shall include, but not be limited to:

(1) Placement security with requirements that include:

(a) External electronic video monitoring of the facility.

(b) Alarms on all external doors.

(c) Emergency response agreements with local law enforcement.

(2) Access to an array of services, consistent with applicable licensing statutes and regulations, and the individually assessed needs of each child, that include at minimum:

(a) Evidence based trauma-informed care.

(b) Treatment and intervention for sexual assault, including appropriate health care.

(c) Psychosocial skill development, including:

1. Resiliency skills;

2. Positive youth development services;
3. Life skills; and,
4. Mentoring.

(d) Education that will transfer back to the child's home district for credit.

(e) Substance abuse screening, and where necessary, access to treatment.

(f) Recreational therapy and personal development.

(g) Discharge planning that is consistent with services received by the child, at the facility.

(3) Placement policy and procedures that shall require that:

(a) Cell phones, unmonitored personnel computers, or other devices that could be used to conduct unsupervised communication with external parties are not allowed.

(b) All client phone and computer usage shall be monitored by program staff.

(c) All off-site activities shall be supervised by program staff.

(d) All visitation shall occur off-site at a location other than the "Safe House" placement.

c. Once a child has been adjudicated dependent and is confirmed to be a victim of commercial sexual exploitation, the community based care lead-agency shall:

(1) Assess the child for placement in a "Safe House" environment in a manner that meets all requirements established by s. 39.524(1), F.S.

(2) All "Safe House" assessments must be updated every 180 days on an ongoing basis for as long as the child is an active participant in an open case where the child is coded as being a confirmed victim of commercial sexual exploitation within the Florida Safe Families Network (FSFN).

(3) Per s. 39.524(2), F.S., the results of any "Safe House" assessment must be included in the next judicial review for the child and at each subsequent judicial review for long as the child is an active participant in an open case where the child is coded as being a confirmed victim of commercial sexual exploitation within the Florida Safe Families Network (FSFN). The court must also be advised in writing of the status of the child's placement, with special reference regarding the stability of the placement and the permanency planning for the child.

(4) Children who fail to participate in the administration of a "Safe House" assessment either through their direct refusal or through their unavailability due to runaway behavior or other similar issues shall have their "Safe House" assessment rescheduled on an ongoing basis. The reason as to why the required "Safe House" assessment has not been completed shall be noted within the Florida Safe Families Network (FSFN).

(5) Special care and consideration should be given to the placement of children who have a history of recruiting other children into the commercial sex trade so as to ensure that the risk of the possible victimization of other children is minimized.



(6) The reason for not placing a child into a "Safe House" environment must be documented within the Florida Safe Families Network in all cases where a child has been adjudicated dependent and the minimum placement requirements for possible consideration for placement into a "Safe House" environment have been met.

(7) Children who have been identified as being from out-of-state that have absconded, escaped, or run away shall be referred to the Florida Department of Juvenile Justice for the purposes of ensuring that all requirements associated with returning these juveniles to the other state, whenever their return is sought, as required by s. 985.801, F.S. (Interstate Compact on Juveniles), is completed prior to completing a "Safe House" assessment, or to the placement of a child into a "Safe House" environment.

d. In those cases where it is believed or determined that a child is a victim of commercial sexual exploitation and/or labor trafficking and the child is not considered to be a citizen of the United States and is in the country illegal or the child is in the country legally but their parent, guardian, or caregiver can no longer care for them, the Department of Health and Human Services, Office of Refugee Resettlement (HHS/ORR) shall be contacted for the purposes of determining if the child will be placed into the Unaccompanied Refugee Minors (URM) program due to the child being a victim of a severe form of trafficking.

e. Upon receipt of a Foster Care Referral or any other similar Florida Safe Families Network (FSFN) message indicating that a child who is already residing in the foster care system and who is a confirmed victim of commercial sexual exploitation and who is continuing to display commercial sexual exploitation behavior, the community based care lead-agency or their contracted services provider shall coordinate with the appropriate law enforcement agency so as to ensure that all information needed to pursue a criminal investigation against any possible trafficker has in fact been provided to the correct law enforcement agency.

f. The community based care lead agency shall develop internal policies and procedures that ensure that the legal rights of children who are possible or confirmed victims of commercial sexual exploitation are protected while still allowing for them to be questioned as part of any ongoing criminal investigation or case against a possible trafficker.

g. The community based care lead-agency shall review the cases of all children that are currently residing in the dependency system that have not already been identified as being currently involved in the commercial sex trade for possible involvement in the commercial sex trade in those cases where the child has 10 or more missing child episodes documented within the Florida Safe Families Network (FSFN) within one year.

#### 8. Unique Service Options for Non-Citizens Victims of Commercial Sexual Exploration and Human Trafficking.

a. Determination of Services. The determination of services and placement of a foreign born child who is a victim of trafficking is dependent on many factors which differ from situations where trafficking is not an issue.

(1) Certification and Eligibility are terms used to describe a process that the Department of Health and Human Services, Office of Refugee Resettlement (HHS or ORR) uses to officially declare that a foreign national is eligible to receive benefits. A child does not have to be "certified" but s/he does need to obtain an "eligibility" letter from HHS to receive a wide range of benefits. (Adults are "certified" and receive a "certification letter." Children are deemed "eligible" and receive an "eligibility letter.")

(2) T The process to obtain an eligibility letter should be coordinated with a local non-governmental organization advocate and law enforcement. (Call the Federal Anti-Trafficking Resource Hotline 1-888-3737-888 for information about local anti-trafficking programs.)

(3) Federal law enforcement will require access to the victim and information from the Non-Governmental Organization Advocate before they will issue a statement that they believe the child is a victim of “a severe form of trafficking.” A Child Protective Investigator cannot make this request on his or her own without law enforcement assistance.

(4) Once a law enforcement agency has issued a statement to ORR that a child is believed to be a victim of trafficking, ORR may issue a letter of eligibility. The victim or the victim’s advocate may then present the letter to social service providers as proof of eligibility. Benefit issuing agencies must call ORR’s toll-free trafficking victim verification hotline at 1-866- 401-5510 to verify the child’s eligibility for benefits and inform HHS of the benefits applied for.

(5) It is very important to work with an advocacy organization that is familiar with BOTH the victim’s rights regarding social services and his/her legal rights. Contact Refugee Services at 850-488-3791 for more information about victim rights and possible benefits.

b. Interim Benefits.

(1) The William Wilberforce Trafficking Victims Protection Reauthorization Act (Public Law 110-457) signed into law on December 23, 2008, directs The United States Department of Health and Human Services (HHS), upon receipt of credible information that a child may have been subjected to trafficking in persons, to make a prompt determination if the child is eligible for up to 90 days of interim assistance. Before the end of that period, HHS, in consultation with USDOJ, DHS and nongovernmental experts, will determine if the child is eligible for long-term assistance. Not later than 24 hours after a Federal, State, or local official discovers that a person who is under 18 years of age, and who is neither a U.S. citizen nor an LPR, may be a victim of trafficking in persons, the official must notify HHS to facilitate the provision of interim assistance.

(2) To request an eligibility letter or interim assistance letter for a foreign child victim of trafficking, contact the HHS Office of Refugee Resettlement (ORR) Anti-Trafficking in Persons Division and complete the “Request for Assistance for Child Victims of Human Trafficking” form located at

[http://www.acf.hhs.gov/trafficking/about/ATIP\\_Request\\_Assistance\\_Child\\_Victims\\_Trafficking.pdf](http://www.acf.hhs.gov/trafficking/about/ATIP_Request_Assistance_Child_Victims_Trafficking.pdf)

and send via email to [childtrafficking@acf.hhs.gov](mailto:childtrafficking@acf.hhs.gov) or via fax (202) 205-4582 on cases where Human Trafficking is believed to be occurring (discuss with point of contact and/or law enforcement to determine when the letter should be sent). Or the CPI or CPI Supervisor can call ORR at 202-205-4582 and speak to an ORR Child Protection Specialist. The Office of Refugee Resettlement (ORR) will issue an eligibility letter (or denial will be sent to requestor) to allow the victim access to federal services under the TVPA for up to 90 days. The Interim Benefits letter is important as immigrant children who are human trafficking victims may not be eligible for the same benefits as United States children who are victims of human trafficking due to their immigration status.

c. Pre-Certification/Pre-Eligibility. Pre-certified/pre-eligible victims of human trafficking residing in the state of Florida who have filed or are in the process of filing an application for a T Visa or are in the process of seeking certification/eligibility as a victim of human trafficking from ORR may be eligible for existing state benefits and services to the same extent as a refugee for a temporary period while they wait for the federal processing or certification/eligibility to be completed. The benefits are comparable to Refugee Cash Assistance (RCA) or Temporary Aid for Needy Families (TANF); Refugee Medical Assistance (RMA); Food Stamps (FS); and Refugee Social Service programs. Contact

Refugee Services at 850-488-3791 for the contact information of the benefits provider and for more details.

d. Eligibility (Children). Benefits to children who receive an eligibility letter may include: Refugee Cash Assistance (RCA) or Temporary Assistance to Needy Families (TANF); Social Security Income (SSI); Medicaid or Refugee Medical Assistance (RMA); Health Screening; Food Stamps (FS); Match Grant; as well as entry into Refugee Social Services programs that may include adult education, legal services, employment assistance, youth and family services, and child care. Contact Refugee Services at 850-488-3791 for the contact information of local Refugee Social Services programs or for more details.

e. Unaccompanied Refugee Minor Program (URMP). The Unaccompanied Refugee Minor Program (URMP) is a federally funded foster care placement option for non-U.S. citizen child victims of human trafficking managed by Refugee Services. Children must receive an eligibility letter from ORR and be reclassified to unaccompanied refugee minor status by ORR prior to entering the URMP. A caseworker seeking URMP as a placement option should immediately contact Refugee Services at 850-488-3791 and ask for the child to be reclassified to unaccompanied refugee minor status. Reclassification, for purposes of entering the URMP, can only be initiated by the Director of Refugee Services. Caseworkers will be required to share information about the case/child with Refugee Services. Not all children will be placed in the URMP; if the child is safe and has bonded with a family in mainstream foster care, the Department may not interrupt that placement unless necessary.

f. Repatriation/Reunification. Repatriation/Reunification is available for foreign born children whose best interests it is to return to his/her home country, and for whom there is not a risk of being re-trafficked.

g. Other Options. CPIs, CBCs, and other interested parties should be aware that an immigrant child who has been a victim of sexual exploitation or other abuses that do not meet the T-Visa requirements have other options that may help the child access services, such as:

(1) Special Immigrant Juvenile (SIJ) Status – potential for immigrant children declared dependent.

(2) U-Visa – potential for victims of sexual assault, domestic violence, and other “qualifying criminal activity” detailed in the regulations.

(3) Violence Against Women Act (VAWA) – used by immigrant children and spouses of U.S. citizens and LPRs who are victims of domestic violence.

BY THE DIRECTION OF THE SECRETARY:

*(Signed original copy on file)*

PETE DIGRE  
Assistant Secretary for  
Operations

SUMMARY OF REVISED, DELETED, OR ADDED MATERIAL

This operating procedure has been substantially revised to include all requirements for responding to allegations of human trafficking of children