

The Price of Slavery: An Analysis of Human Trafficking Policy and Spending in Department of Defense Procurement

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Overview

- Research Question and Sponsor
- Prevention, Monitoring, and Response
- FAR 52.222-50 – CTIP Clause
- Results - Spend Analysis
 - PPE
 - Construction Services
 - Food & Food Products
- Recommendations
- Human Trafficking Risk Dashboard Prototype



Research Question and Sponsor

- How can DOD better leverage its acquisition workforce, sourcing expertise, and data to rigorously uphold United States policy of zero-tolerance for human trafficking?
- DOD CTIP Program Management Office

FAR 52.222-50, Combating Trafficking in Persons

- >\$550K, non-COTS service & commodities, & outside US
- Does this criteria go toward a zero-tolerance policy?

DEPARTMENT OF THE
DEFENSE
TRAFFICKING

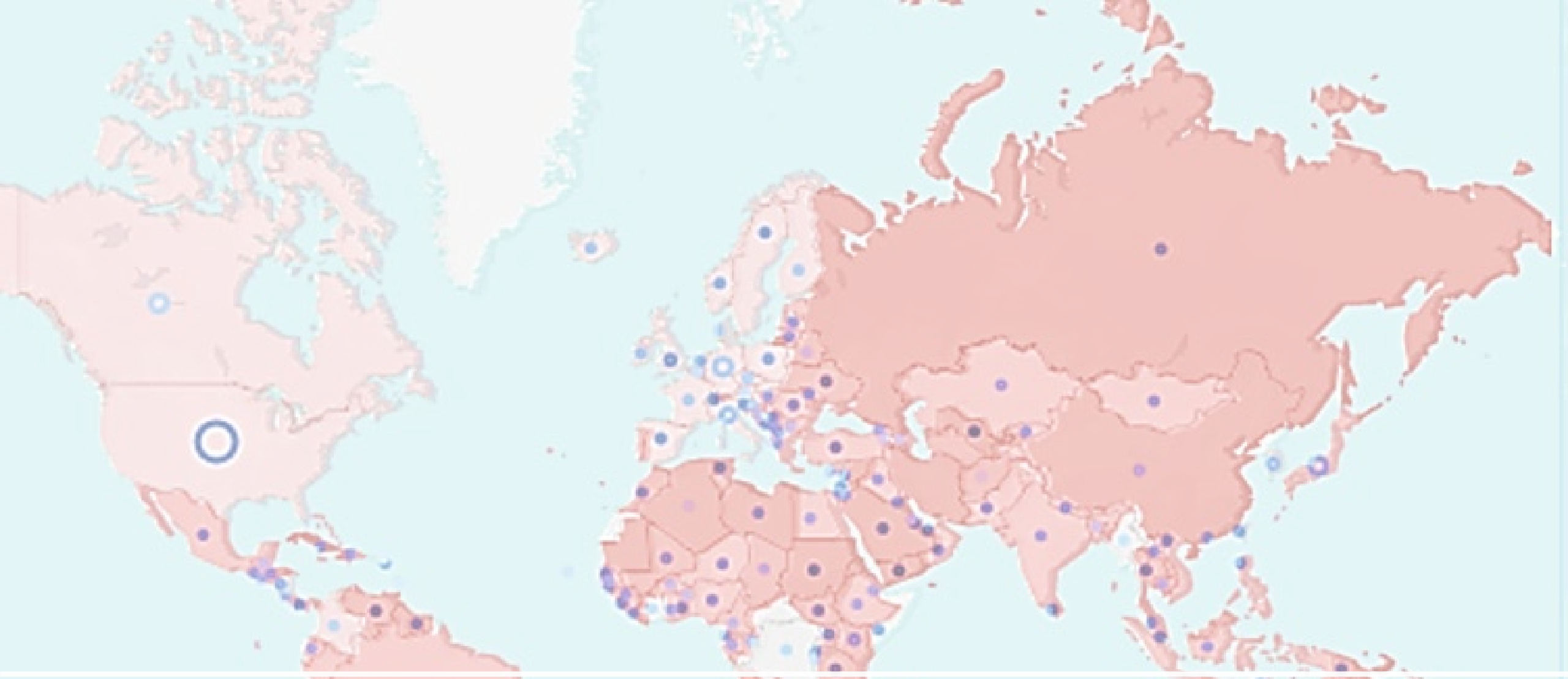
Prevention, Monitoring & Response

PREVENTION (pre-award/award)	How to stop human trafficking from happening within acquisitions
MONITORING (post-award/contractor performance)	How to identify human trafficking within DoD acquisitions, through a standardized process
RESPONSE (post-award/contractor performance)	Who's responsible and how to respond should human trafficking be discovered on a DoD acquisition

Spend Analysis

- AFBIT Lite
 - Spending visualization tool that captures FPDS data from USASpending and SAM
- Identify areas of high DoD spend
 - Geographically
 - Market - Product & Service Codes (PSCs)
 - www.fscpsc.com
- Apply recommendations through a top-down method
- Limitations
 - Reliant on data inputs
 - Classified, green door, Special Access Programs (SAP)
 - PSCs don't fully capture the market
 - Only capturing spend at the prime level





OCONUS DoD Spend vs Human Trafficking Tiers

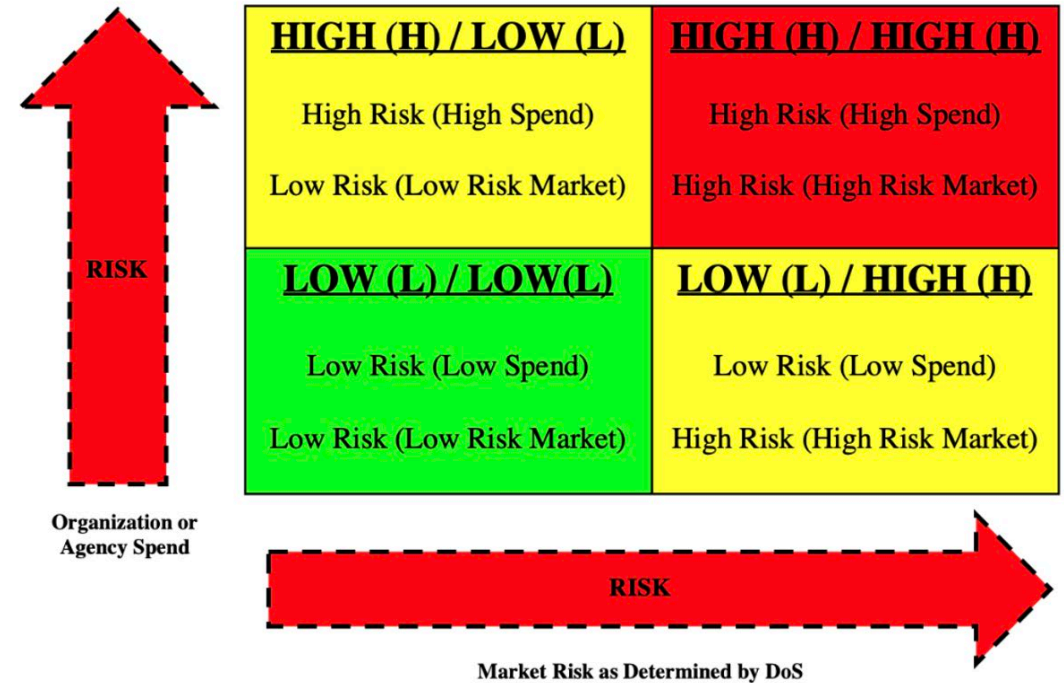
Results

PPE	Construction	Food & Food Products
<ul style="list-style-type: none">• DOD spent \$6.66 billion for PPE in FY19 and FY20.• PPE is considered a COTS item, meaning it is <i>not covered</i> under the criteria for requiring a CTIP compliance plan from a defense contractor.• \$5.26 million spent on PPE in Tier 3 countries.	<ul style="list-style-type: none">• DOD spent \$42.42 billion for construction services in FY19 and FY20.• DOD spent \$5.37 billion OCONUS on construction services, which fall under the criteria for a defense contractor to submit a CTIP compliance plan.• This reveals a \$37.3 billion gap in CTIP prevention and monitoring since those construction services were performed domestically and not covered under the criteria for submitting a CTIP compliance plan.	<ul style="list-style-type: none">• DOD spent \$3.29 billion on food and food products in FY19 and FY20.• FY19 and FY20 there was less than \$1 million spent for food and food products in Tier 3, Tier 2 Watch List, and Special Case countries.• Food and food products are considered COTS items and do not require a CTIP contractor compliance plan.



Recommendation	Description
FAR 22.17, FAR 52.222–50, CTIP Clause	<p>Removal of certification and compliance plan criteria</p> <p>Incorporating clause by full text into the contract</p>
DOD Human Trafficking Training for Acquisition Personnel	Creating mechanisms to ensure acquisition professionals are current with required training
CTIP Acquisition Representatives	Create human trafficking-specific positions in buying agencies that are identified as high-risk
CTIP General Training Requirements	Reinstate and improve the human trafficking general awareness to all of DOD
Synergy of Efforts Across the Anti-Human Trafficking Ecosystem	<p>Use existing human trafficking agencies as a springboard to collaborate with anti-human trafficking organizations</p> <p>Establish a single resource to collect data, best practices, and information regarding human trafficking</p>

Recommendation	Description
The Contracting Officer Representative (COR)	Add human trafficking-focused questions into site surveys and labor checks that could identify red flags Allow CORs to conduct labor checks at the subcontractor level
Risk Model	Require buying agencies to build a human trafficking risk model on an annual basis
Human Trafficking Risk Dashboard	The prototype expedites the ability to conduct a spend analysis as it relates to DOS country tier list, amount of spend, and at-risk markets (by PSC and the North American Industry Classification System [NAICS])
Installation Access <u>With</u> Labor-Monitoring Mechanism	Involve the contracting office in the vetting process of defense contractor employees when entering DOD installations



Recommendation	Description
Increase interaction with all agencies tasked to respond to human trafficking	Assemble DOD and non-DOD agencies to increase <u>cross-pollination</u>
A single CTIP platform	Create a single platform for the acquisition workforce to report CTIP identifiers
Victim responsibility	Convicted contractors be required to provide restitution to CTIP victims

IF YOU SUSPECT SOMEONE MAY BE
A VICTIM OF HUMAN TRAFFICKING,

REPORT IT

#HUMANTRAFFICKINGAWARENESSDAY



Human Trafficking Risk Dashboard Prototype

[Link to Prototype](#)

