PERFORMANCE AUDIT

Office of the Washington State Auditor
Pat McCarthy

Assessing Washington's State-Level Human Trafficking Awareness Efforts

September 1, 2026

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Executive Summary

State Auditor's Conclusions (page 31)

It's an unpleasant reality that human trafficking does happen in Washington. In acknowledging this fact, the state has an obligation to raise public awareness of its existence. More importantly, exploited people need to know help is available and they are not alone.

Washington's statewide efforts to raise awareness of human trafficking – both sex trafficking and labor trafficking – can help the public and victims identify it as a crime and connect survivors with services. This performance audit provides an important survey of those awareness efforts across five state agencies.

Those agencies addressed awareness in their areas of service, many voluntarily going over and above legal requirements. But the state's efforts overall are vulnerable to gaps and overlaps.

An example of one such risk is our finding that a telephone number mentioned in state law is no longer in service. The agency responsible for managing this number intended to use it to refer people to local crime victim services, but found it frequently confused callers who were looking for immediate help and decided to disconnect it. Nonetheless, other agencies continued to list the disconnected number on their posters and websites. That gap created the possibility that exploited people – having seen a poster and summoned the courage to call for help – had their calls go literally unanswered.

As a state, we must ensure our laws and materials are current and effective. This report includes a number of leading practices from other states, listed in more detail in an appendix. And we found the Washington State Task Force Against the Trafficking of Persons is well positioned to consider and recommend to legislators needed updates and expansions of state awareness requirements.

By better coordinating activities across the full range of involved public agencies, we can boost the chances that the ugly crime of human trafficking is exposed, and its survivors offered the help they need.

Background (page 7)

Human trafficking is an illegal trade of exploiting people, often those who are more vulnerable. It is defined as using force, fraud or coercion to compel a person

into any form of work, whether sex or other labor. Human trafficking happens in Washington, though few may recognize it when they see it.

Raising awareness is an important early step that can help identify cases, then connect survivors with services. Two of the most common awareness tools are poster campaigns and awareness trainings. In Washington, many organizations have responsibilities related to human trafficking awareness, including government agencies, nonprofit organizations and multidisciplinary groups. The Washington Task Force Against the Trafficking of Persons is responsible for making legislative recommendations to further the state's anti-trafficking efforts.

This audit sought to better understand Washington's state-level human trafficking awareness activities and any opportunities for improvement. We evaluated a selection of state-level human trafficking awareness responsibilities under state law. We also gained a better understanding of leading practices by reviewing expert reports and laws in other states to help us find any gaps between Washington's laws and leading practices.

Selected state agencies carried out many required and recommended human trafficking awareness activities (page 12)

We evaluated five state agencies with important human trafficking awareness responsibilities:

- **The Department of Children, Youth, and Families (DCYF)** conducts awareness activities for groups who work with children and youth. The agency updated its mandatory reporting poster to include trafficking, reported it is completing required screening for children, and offers awareness training for various groups including those within the child welfare community, juvenile rehabilitation and child care.
- **The Department of Commerce** administers a statewide awareness training program for some criminal justice personnel. The agency coordinated four training sessions for law enforcement and prosecutors across the state in 2024 and 2025.
- **The Department of Labor & Industries (L&I)** addressed trafficking awareness on posters and in a training for adult entertainers. Staff said the agency also offers training to employees that has helped them identify some possible cases of human trafficking.
- **The Department of Transportation (WSDOT)** installed awareness signage at rest areas statewide, and also went beyond requirements with other posters and training.

- **The Office of Superintendent of Public Instruction (OSPI)** reviewed and posted curricular resources to help school districts educate students about sex trafficking.

Updating state laws and some agency materials could improve Washington's human trafficking awareness activities (page 21)

Outdated awareness laws and materials might be hindering Washington's human trafficking awareness efforts. Commerce developed a required model version of a poster in 2016, but an updated version does not exist. Some human trafficking laws and materials reference a disconnected telephone number, though other resources are typically available as well. Commerce staff said they have not provided information to medical, mental health and social work groups in several years.

Some state laws and activities focus on sex trafficking, which can obscure the urgency of labor trafficking awareness. This includes laws for screening children, training criminal justice personnel, educating students and training teachers.

Leading practices and other states suggest Washington has other gaps and weaknesses in its awareness laws. It lacks state laws requiring training for certain categories of workers recommended by leading practices. It also lacks nondiscretionary laws about signs in some locations recommended by leading practices.

Washington's Task Force Against the Trafficking of Persons is well positioned to consider expanding the state's human trafficking awareness laws. However, by adding activities to align state laws with leading practices, Washington's agencies may face resource concerns.

Recommendations (page 32)

We made two recommendations to Washington's Task Force Against the Trafficking of Persons. The first was for the task force to evaluate whether the state's anti-trafficking efforts would be improved by expanding and strengthening state laws to better align with leading practices and other states. The second was to evaluate how state laws that reference a disconnected victims' services phone number should be updated. For both, we asked the task force to make recommendations to the Legislature accordingly.

We also made a series of recommendations to the Department of Commerce's Office of Crime Victims Advocacy to update certain awareness materials.

Next steps

Our performance audits of state programs and services are reviewed by the Committee to Hear SAO Performance Audits and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with committee members in Olympia. The public will have the opportunity to comment at this hearing. Please check the committee's website for the exact date, time and location (https://leg.wa.gov/about-the-legislature/committees/joint/sao-audit-committee/). Our Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology. See the **Bibliography** for a list of references and resources used to develop our understanding of topic area.

Background

Human trafficking is an illegal trade of exploiting people, a crime which often goes undetected

Human traffickers profit by exploiting other people. Despite the common perception that human trafficking involves only movement across borders, this is far from the case. Human trafficking is defined as using force, fraud or coercion to compel a person into any form of work, in any location. It may be in the commercial sex industry, but labor trafficking occurs in industries as diverse as hospitality, agriculture and domestic service. Exploitation of a minor for commercial sex is considered human trafficking, even without the use of force, fraud or coercion.

Traffickers use a variety of strategies to control their victims. They might use overt force, intimidation or the threat of violence to exert control. They might lure workers with the promise of payment or other benefits, then abandon those promises and continue threatening the workers with exposure or harm if they try to leave. Traffickers may withhold necessities such as food, shelter, wages or personal documents. And finally, they may manipulate their victims by isolating them from others, addicting them to drugs and offering a false perception of love or belonging.

Traffickers often target those who are more vulnerable

Anti-trafficking organizations warn that people from marginalized groups and the most vulnerable populations are often traffickers' preferred targets. This includes children, particularly LGBTQ+ youth or those involved in the child welfare system who likely have less stable support networks. Others at risk of being trafficked are those with needs traffickers can exploit: migrant workers, people with disabilities, and those experiencing poverty, homelessness, substance use disorder or past trauma. Indigenous people and racial minority groups who have historically faced discrimination – and its many social, economic and other consequences – are disproportionately harmed by human trafficking. Some from these communities face multiple, intersecting vulnerabilities – for example, a Black woman who experienced systemic barriers to housing, education and services as well as childhood trauma.

Human trafficking happens in Washington, though few may recognize it when they see it

It is clear that human trafficking happens in Washington. In 2024, the National Human Trafficking Hotline received a total of 659 tips from this state, 191 of which were provided by survivors of trafficking.

However, the secretive nature of the crime and a general lack of awareness of its characteristics mean few people recognize human trafficking for what it is, and so many cases go unreported. Even victims may be so manipulated that they do not recognize their situation as one of trafficking. Other victims may be too frightened to come forward out of fear of retaliation. As a result, many experts in the field acknowledge that accurate data on the prevalence of human trafficking is uniquely difficult to obtain, and warn that existing data represents only the smallest fraction of this largely hidden crime.

Raising awareness is an important early step that can help identify cases, then connect survivors with services

The state can aim to counter human trafficking by publicizing its characteristics and ways government officials, survivors and other people can take appropriate action.

Public awareness campaigns use a wide variety of tools and techniques, including social media outreach, billboards and TV or radio coverage, sometimes centered on major events that attract millions of eyes and ears like the Super Bowl. Two of the most common awareness tools at the state's disposal are poster campaigns and trainings.

- **Posters, notices or signs,** often placed in discreet locations such as restroom stalls, typically include common signs of human trafficking and a way to reach out for help, often through a telephone number, a text line or a QR code linked to a website. Many signs, such as the example here posted by Washington State Ferries, are geared toward victims themselves, so they might recognize their situation for what it is and seek help.

Source: Washington State Ferries.

- **Awareness trainings** can be required for people in certain professions, such as law enforcement or child welfare workers, or offered to groups or organizations with relevant interests. Professionals gain understanding and tools that help them recognize human trafficking and take steps to connect the victim with support and assistance.

People working to combat human trafficking hope that by increasing a community's understanding of the problem, the result will be better identification of potential cases and victims. However, the evidence for the success of these efforts is mixed. Some experts caution that there is limited evidence that awareness activities lead to the identification of more cases. Other studies suggest these activities increase understanding of the crime in the short-term. The U.S. Department of Transportation's Advisory Committee on Human Trafficking reported in 2024 that 99% of those who took an online "Truckers Against Trafficking" training said they had gained an improved understanding of human trafficking indicators and felt better equipped to report suspected instances of crime.

Once identified, a trafficking survivor can be connected to needed services

After a case of trafficking has been identified, the next step recommended by anti-trafficking organizations is to build trust with the survivor, to let them know resources are available and help identify their self-determined needs. Their immediate needs could include emergency shelter, medical care, clothing or other essentials. Survivors who decide to pursue charges will need help to navigate legal procedures; depending on the case, this might require immigration assistance or child custody proceedings. Once they are safe, they may need mental health and substance use services, employment support or vocational training, and more. And throughout the process, they should receive specialist, trauma-informed care after enduring the psychological, physical or sexual abuse of their traffickers.

Many organizations exist to provide services to survivors of human trafficking in Washington, including those operated by nonprofits and local, state and Native American tribal governments, often working together. For example, the Department of Commerce's Office of Crime Victims Advocacy (OCVA) awards grants to groups that serve survivors directly by connecting them to housing or health care. According to a Commerce report covering fiscal year 2023, funded programs served nearly 700 people.

Even though the need is great, some service providers worry about insufficient funding

Notwithstanding the great need, some organizations are worried about the lack of funding for survivors' services and gaps in existing services. They cite critical needs such as safe housing and employment services. An analysis by Commerce found that the amount of federal Victims of Crime Act funding for the state, intended

to help people harmed by criminal activity including trafficking, has fluctuated significantly in recent years – providing just 25% in 2024 of what it had in 2018. However, it also says the state supplemental funding has helped fill that gap.

In Washington, many organizations have responsibilities related to human trafficking awareness

Organizations large and small conduct human trafficking awareness activities, including government agencies, nonprofit organizations and multidisciplinary groups.

Many state agencies hold responsibilities that align with their mission and goals. For example, Commerce's OCVA serves as the voice within government for crime victims and holds several responsibilities related to human trafficking awareness, spanning trainings, posters and other informational resources. The Department of Children, Youth, and Families (DCYF) is tasked with protecting vulnerable children, which includes screening youth who may be suspected of being trafficked.

Nongovernmental organizations also bring awareness to human trafficking as part of their overall missions. For example, two nonprofit groups, Businesses Ending Slavery and Trafficking (BEST) and Innovations Human Trafficking Collaborative, work with multiple agencies to help address trafficking. BEST is involved in training for both government and private industry, ranging from state agencies to businesses involved in hospitality, transportation and airport services.

A Washington task force is responsible for making legislative recommendations to further the state's anti-trafficking efforts

The Legislature established Washington's Task Force Against the Trafficking of Persons in 2003. The task force was assigned a wide range of duties related to anti-human trafficking efforts. Membership includes representatives from the Legislature, various state agencies, experts from organizations that serve survivors and others. They are directed to make recommendations on legislation, and assess the impact and effectiveness of strategies in state law.

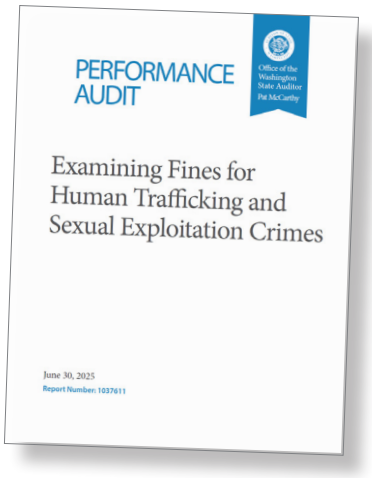
While other coordinating groups play a role in awareness, they focus on specific populations or specific locations. For example, the Youth Human Trafficking Coordinating Committee (formerly known as the Commercially Sexually Exploited Children Statewide Coordinating Committee), which is authorized in state law and is specific to children, is convened by the Center for Children & Youth Justice. The Washington Advisory Committee on Trafficking (WashACT) is a multidisciplinary task force convened by the U.S. Attorney's Office and serves Western Washington.

This audit examined Washington's state-level human trafficking awareness laws and activities

This audit sought to better understand Washington's state-level human trafficking awareness activities and any opportunities for improvement. We evaluated a selection of state-level human trafficking awareness responsibilities under state law. We also gained a better understanding of leading practices by reviewing expert reports and laws in other states to help us find any gaps between Washington's laws and leading practices. **Appendix C** brings together dozens of references to our research and practices identified across the nation in other states.

The audit answered the following questions:

1. What state-level human trafficking awareness activities does Washington state law require, and which agencies participate in those efforts?
2. What practices related to human trafficking awareness do other states use or leading practices recommend?
3. How might Washington improve its efforts to identify human trafficking compared to state law, other states or leading practices?



Read our 2025 report on human trafficking issues on our website: portal.sao.wa.gov/ReportSearch/Home/ViewReportFile?arn=1037611&isFinding=false&sp=false

Audit Results

Selected state agencies carried out many required and recommended human trafficking awareness activities

Results in brief

We evaluated five state agencies with important human trafficking awareness responsibilities:

- **The Department of Children, Youth, and Families (DCYF)** conducts awareness activities for groups who work with children and youth. The agency updated its mandatory reporting poster to include trafficking, reported it is completing required screening for children, and offers awareness training for various groups including those within the child welfare community, juvenile rehabilitation and child care.
- **The Department of Commerce** administers a statewide awareness training program for some criminal justice personnel. The agency coordinated four training sessions for law enforcement and prosecutors across the state in 2024 and 2025.
- **The Department of Labor & Industries (L&I)** addressed trafficking awareness on posters and in a training for adult entertainers. Staff said the agency also offers training to employees that has helped them identify some possible cases of human trafficking.
- **The Department of Transportation (WSDOT)** installed awareness signage at rest areas statewide, and also went beyond requirements with other posters and training.
- **The Office of Superintendent of Public Instruction (OSPI)** reviewed and posted curricular resources to help school districts educate students about sex trafficking.

We evaluated five state agencies with important human trafficking awareness responsibilities

Washington state law requires or authorizes many different state-level human trafficking awareness efforts, including trainings, posters and notices, and screening

children for signs of trafficking. These different activities share the common goal of increasing public awareness and connecting survivors to services.

While many state agencies are involved in human trafficking awareness activities that align with their mission and goals, we selected five agencies with specific and important responsibilities in current state law. **Exhibit 1** lists audited agencies, how their mission and goals link to human trafficking awareness, and their legal responsibilities. Note that some of the listed activities are "authorized," meaning state law says these actions may be considered discretionary 'as funding' or 'as circumstances' allow.

Exhibit 1 – Selected agency human trafficking awareness responsibilities in law

** Indicates the activity is not mandatory, but the law gives agencies discretion in implementing it.*

Agency	Primary responsibilities	Required or discretionary activities under state law
Department of Children, Youth, and Families (DCYF)	Oversees activities, including human trafficking awareness, within child welfare, juvenile rehabilitation and early care and education	**Posters –** Publish a printable and downloadable poster on its website that includes requirements to report child abuse or neglect, which includes trafficking **Screening –** Screen children for possible commercial sexual abuse of a minor
Commerce's Office of Crime Victims Advocacy (OCVA)	The voice within state government for crime victims, including survivors of human trafficking	**Training –** Administer a human trafficking training program for criminal justice personnel **Model poster –** Approve and annually review a model version of a poster about human trafficking for display in public restrooms **Informational material –** Provide certain medical, mental health and social work organizations with information on human trafficking to share with licensees
Department of Labor & Industries (L&I)	Works to ensure safety, health and security of Washington workers, including by providing human trafficking awareness materials and training	**Training –** Develop training for adult entertainers that includes the risk of human trafficking **Posters* –** Add information on how to help trafficking victims to its posters and brochures, as the agency deems appropriate **Model form* –** Create a model form for domestic employers and international recruitment agencies to provide to foreign workers
Department of Transportation (WSDOT)	Helps ensure safety of the traveling public, including by providing awareness materials and training	**Posters* –** May add informational posters at rest areas, including working with advocates to develop posters
Office of Superintendent of Public Instruction (OSPI)	Oversees public K-12 education while providing schools human trafficking awareness curricula and resources	**Curricula* –** Review curricula for sex trafficking prevention education for students, subject to the availability of funds **Resources* –** Make resources available in a library of openly licensed courseware, to the extent practicable

Source: Auditor assembled from state laws listed in Figure 1 in Appendix B.

Beyond activities outlined in state law, agencies may voluntarily undertake activities recommended by leading practices. In addition to evaluating required awareness activities, this audit recorded some of the additional efforts agency staff said they have undertaken. Some of them also appeared in our research – a review of leading practices and laws in other states (see Appendix C). While this report does not mention every optional activity they conducted, it does include detailed descriptions of a number of specific efforts.

Department of Children, Youth, and Families (DCYF)

DCYF conducts awareness activities for groups who work with children and youth

DCYF is the state's lead agency tasked with providing better outcomes for children, families and young people under the age of 25. The main audience for its human trafficking awareness work is groups who work with children and youth.

REQUIRED

Updated its mandatory reporting poster to include trafficking

State law directs DCYF to publish a poster on its website that includes specific information about reporting suspected cases of child abuse and neglect, including who is required to report, definitions of reportable crimes, and how and where to submit a report. Changes to the law, effective July 1, 2025, expanded the definition of abuse and neglect to include trafficking. DCYF updated its poster accordingly in January 2026; **Exhibit 2** illustrates the new poster, which is also available in Korean, Russian, Simplified Chinese, Somali, Spanish and Vietnamese.

Exhibit 2 – DCYF's mandatory reporter poster now includes mention of trafficking

What Must Be Reported?

- Physical abuse
- Sexual abuse
- Sexual exploitation
- Severe forms of trafficking in persons
- Negligent treatment or maltreatment
- Abandonment

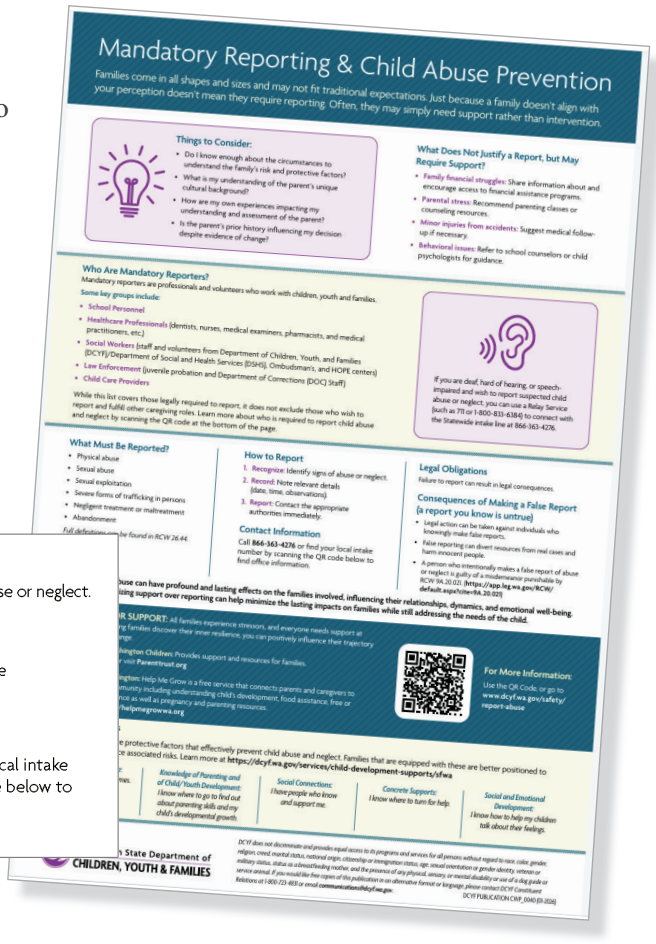
Full definitions can be found in RCW 26.44.

How to Report

1. **Recognize:** Identify signs of abuse or neglect.
2. **Record:** Note relevant details (date, time, observations).
3. **Report:** Contact the appropriate authorities immediately.

Contact Information

Call **866-363-4276** or find your local intake number by scanning the QR code below to find office information.



Source: DCYF.

REQUIRED

Reported the agency is completing required screening for children

A new state law that came into effect on July 1, 2025, requires DCYF and juvenile justice agencies to screen children they suspect may be victims of commercial sexual abuse of a minor, a form of human trafficking. This requirement aligns with leading practices which broadly advise screening children caught up in protective or judicial systems for commercial sexual exploitation or human trafficking.

Any provider serving children and young people, including child welfare workers and juvenile justice officers, may use a screening tool of questions that helps them evaluate the child's situation. The more issues providers score as 'possible or clear concern,' for example, the more reliably they can confirm whether it is truly a case of sex trafficking so they can refer the child to services appropriately and notify police about the case.

DCYF staff said the agency is following the law in its screening of children, using a screening tool on all reports of commercial sexual abuse of a minor or commercial sexual exploitation of a child that staff receive through the agency's intake system. DCYF showed auditors internal reports reflecting that the agency conducted more than 200 screenings between July and October 2025, across three agency divisions and six regions.

Leading Practice

Offers awareness training for various groups, including within the child welfare community, juvenile rehabilitation and child care

Leading practices strongly recommend, and other states require, providing training for key groups that work with children and youth involved in protective or judicial systems. This includes child welfare agency workers, juvenile justice agency workers, foster parents and other caregivers.

While human trafficking awareness training is not explicitly required by Washington state law, DCYF requires or offers trainings that include information on human trafficking to its staff as well as foster parents and caregivers. Training topics include four specific areas.

- **Mandatory reporting, for foster parents and employees in child welfare or juvenile rehabilitation.** DCYF requires annual training for its own staff, including child welfare and juvenile rehabilitation workers, to ensure they understand mandatory reporting requirements around child abuse and neglect. New foster parents must take a similar training. DCYF revised the training to include human trafficking, in alignment with the July 2025 amendment to state law.
- **Commercially sexually exploited children, for case-carrying staff.** According to agency staff, DCYF policy requires staff in the Child Welfare

Division and Licensing Divisions to take this training within the first year of employment.

- **Human trafficking awareness, for DCYF juvenile rehabilitation workers.** These employees must take an awareness training titled "DCYF JR Identifying and Responding to Human Trafficking Foundation Skills."
- **Human trafficking awareness for foster parents and other caregivers.** Among the optional trainings DCYF offers is a commercial sexual exploitation awareness training designed for a wide spectrum of caregivers, including anyone who has placement of a youth or child such as foster parents, kin or a placing agency. Agency staff said they are also working on updating other trainings for child care and early learning providers.

Department of Commerce

Commerce administers a statewide awareness training program for some criminal justice personnel

As the voice within state government for crime victims, Commerce's Office of Crime Victims Advocacy (OCVA) is involved in a variety of human trafficking awareness activities. For example, OCVA staff said the agency responds to requests for information and collaborative trainings from organizations as diverse as Truckers Against Trafficking and the Yakama Nation. This audit evaluated OCVA's three main responsibilities set out in state law:

- Statewide trafficking awareness training for law enforcement personnel, prosecutors and court personnel
- A model version of a poster, meant as an option for establishments to display in their public restrooms
- Information for medical, mental health and social work groups

This report discusses issues fulfilling the latter two requirements in Chapter 2, pages 22 and 24.

REQUIRED

Statewide training program for police, prosecutors and courts

Commerce must administer a human trafficking training program designed for law enforcement personnel, prosecutors and court personnel. It must specifically address state trafficking laws that include definitions of trafficking, which are key to awareness and identification of victims. Such training for law enforcement is also advised by leading practices.

OCVA coordinated four training sessions for law enforcement and prosecutors across the state in 2024 and 2025, featuring state and federal laws, working with victims, and understanding the diverse populations most affected by human trafficking.

Commerce has attempted to train additional court personnel – judges specifically – but has been unsuccessful in its efforts. For example, in 2018, Commerce created a proposal to deliver this training at a judicial conference but staff said this request was denied.

Department of Labor & Industries (L&I)

L&I addressed trafficking awareness on posters and in a training for adult entertainers

Washington's Department of Labor & Industries (L&I) is responsible for ensuring the safety, health and security of Washington workers. As part of this work, L&I is involved with several efforts focused on providing workers with necessary human trafficking information. For instance, staff said L&I offers human trafficking awareness training to its employees and developed a protocol describing how to report possible cases. Staff said the training and protocol had resulted in several cases being referred to survivors' services or law enforcement.

This audit evaluated L&I's responsibilities around awareness set out in state law:

- Develop training about the risk of trafficking for adult entertainers
- Add trafficking awareness information to L&I posters, as the agency deems appropriate
- May create a model form for employers and recruitment agencies to give to foreign workers. (However, L&I has not implemented this discretionary activity. We discuss this issue in Chapter 2, page 28.)

REQUIRED

Produced a training for adult entertainers

As required, L&I produced a training for adult entertainers that includes information about the risk of human trafficking. Entertainers must provide proof they took the training to receive or renew their license, which is issued by a local government. L&I's online training also incorporates resources and ways for survivors to seek help. The training functions on smartphones, so it can be taken even if someone does not have access to a computer.

AUTHORIZED

Updated posters for workers statewide

State law authorizes L&I to integrate information on how to help victims of human trafficking into its posters and brochures to workers, as it deems appropriate. L&I has done so with two posters it makes available online: "Your Rights as a Worker" and "Adult Entertainment: Entertainer rights, establishment responsibilities." Both posters include victim services telephone numbers, and are available in at least one other language besides English.

Department of Transportation (WSDOT)

WSDOT installed awareness signage at rest areas statewide, and also went beyond requirements with other posters and training

State law describes actions WSDOT may take to help ensure the safety of travelers and workers in the transportation industry, which includes placing informational posters at rest areas in Washington. In addition to evaluating the activities statute specifically mentioned, the audit noted two additional activities WSDOT conducts that go beyond what the law set out.

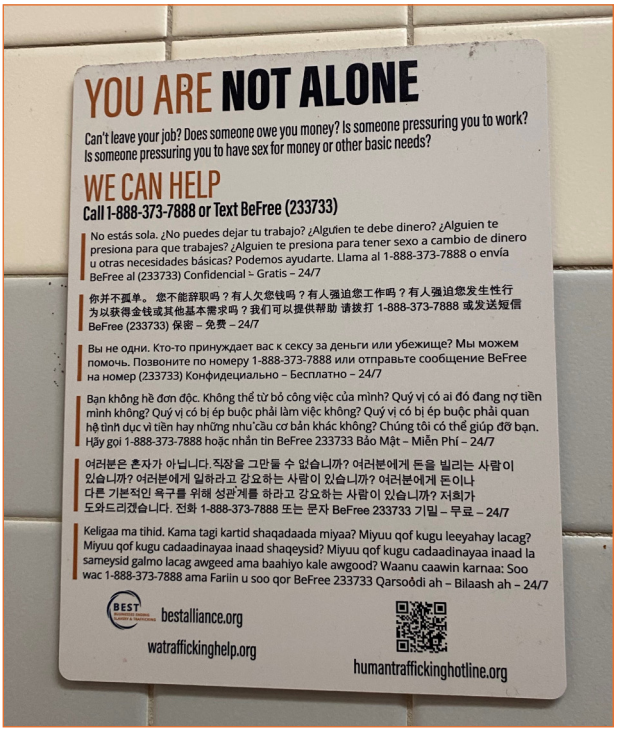
AUTHORIZED

Installed awareness materials at rest areas statewide

In 2012-2014, WSDOT granted permits to an anti-trafficking organization, Seattle Against Slavery, to install permanent signs in rest area restrooms and information kiosks at locations throughout the state.

In 2022, the Legislature approved a one-time, $50,000 appropriation to install updated signs. WSDOT worked with several groups to develop signs that are victim-centered, with "We Can Help" messages in seven languages that promote the national human trafficking hotline number.

In 2022, WSDOT reported to the Legislature that it installed 220 signs in rest areas across Western Washington. WSDOT employees later said the agency placed an additional 219 signs in Eastern Washington. The agency also has established policies and manuals for replacing signs if they are damaged or removed.



Source: Auditor photo at Washington rest area.

Leading Practice

Conducts additional awareness efforts that reflect leading practices

WSDOT staff described other steps the agency has taken that are not specifically mentioned in state law, but which widen the reach of its anti-trafficking messages. They include:

- **Ferries and train signage.** To reach more travelers in the state, WSDOT worked with Businesses Ending Slavery and Trafficking (BEST) to create digital signs to be displayed on ferry vessels and terminals. WSDOT contracts with Amtrak to install human trafficking awareness posters in restrooms aboard its trains and in all rail stations.
- **Training.** Staff said the agency had partnered with OCVA and local groups, including BEST and Truckers against Trafficking, to deliver training in preparation for the upcoming FIFA World Cup soccer tournament.

Office of Superintendent of Public Instruction (OSPI)

OSPI reviewed and posted curricular resources to help school districts educate students about sex trafficking

OSPI is the primary agency charged with overseeing public K-12 education in the state. It conducted two activities, authorized in a new state law passed in 2023, that provided human trafficking awareness resources to school staff and students.

- Reviewed curricula related to the awareness and prevention of sex trafficking by June 30, 2024
- Posted materials related to sex trafficking in an online library

Both, however, came with caveats that could inform OSPI's success in pursuing them in the future.

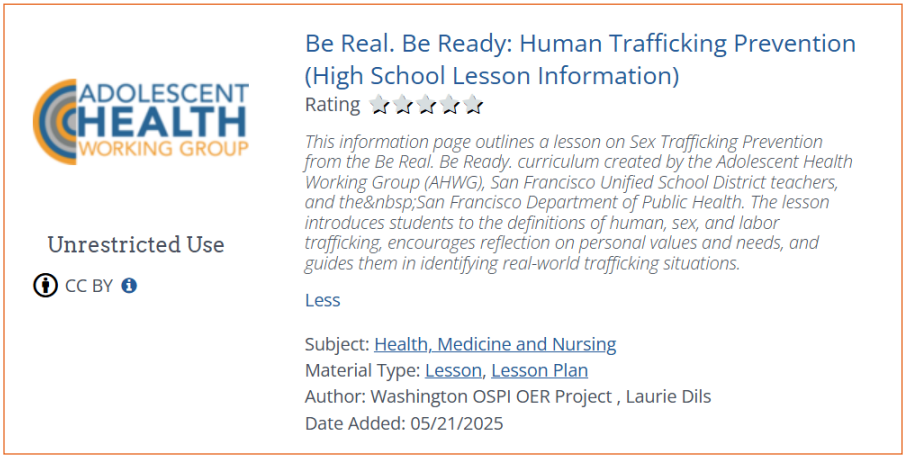
AUTHORIZED

Curricula review and resources related to sex trafficking awareness

OSPI's authorized review of curricula was made required "subject to the availability of amounts appropriated for this specific purpose." Although the Legislature did not provide funding to OSPI for this activity, the agency has completed its review of these resources.

The direction to make resources related to sex trafficking available in a library of openly licensed courseware was made "to the extent practicable." As of November 2025, OSPI has posted six materials related to sex trafficking on the Open Educational Resources online library, including the example shown in **Exhibit 3**.

Exhibit 3 – Example of one curricular resource available on Washington's Open Educational Resources online library



Source: OSPI Open Educational Resources online library.

This new law also required school districts to offer sex trafficking awareness and prevention instruction, but this was too recent to evaluate

Aside from these authorized activities at OSPI, this new law requires school districts to offer instruction in sex trafficking awareness and prevention to students beginning no later than the 2025-26 school year. Each student must receive this instruction at least once between grade 7 and graduation. To prepare schools for implementing these new courses, OSPI staff said they have distributed information about the requirements to school administrators, as well as discussing them with other school staff and community groups.

Because this is a new requirement, OSPI has limited information on whether and how schools were fulfilling this responsibility, but said the State Board of Education anticipates having data by next year.

Updating state laws and some agency materials could improve Washington's human trafficking awareness activities

Results in brief

Outdated awareness laws and materials might be hindering Washington's human trafficking awareness efforts. For example, Commerce developed a required model version of a poster in 2016, but an updated version does not exist. Some human trafficking laws and materials reference a disconnected telephone number, though other resources are typically available as well. Commerce staff said they have not provided information to medical, mental health and social work groups in several years.

Some state laws and activities focus on sex trafficking, which can obscure the urgency of labor trafficking awareness. This includes laws for screening children, training criminal justice personnel, educating students and training teachers.

Leading practices and other states suggest Washington has other gaps and weaknesses in its awareness laws. It lacks state laws requiring training for certain categories of workers recommended by leading practices. It also lacks nondiscretionary laws about signs in some locations recommended by leading practices.

Washington's Task Force Against the Trafficking of Persons is well positioned to consider expanding the state's human trafficking awareness laws. However, by adding activities to align state laws with leading practices, Washington's agencies may face resource concerns.

Outdated awareness laws and materials might be hindering Washington's human trafficking awareness efforts

Most selected state agencies have implemented human trafficking awareness activities as required in state law or recommended by leading practices. However, we found certain Washington awareness laws and materials were out of date, with the likely consequence of missed opportunities to identify cases of human trafficking and help connect survivors with services.

Three issues we identified primarily concerned Commerce:

- The model version of the poster on human trafficking is out of date, with constraints on how the agency can revise and distribute a new version.

- A victims' telephone number, though no longer functioning, persists in materials available in physical form, online and in state law.
- Out-of-date materials provided to medical, mental health and social work groups.

Commerce developed a required model version of a poster in 2016, but an updated version does not exist

Leading practices and other states advise placing posters or notices where people can see them to help identify potential cases of human trafficking. California state law, for example, requires its Department of Justice to develop a model notice and make it available for download on the agency's website. Washington state law required Commerce's Office of Crime Victims Assistance (OCVA) to initially approve, and then annually review, a model notice on human trafficking for establishments to voluntarily post in their public restrooms for their patrons.

In 2016, Commerce duly reported to the Legislature that it had worked with several anti-trafficking nonprofit groups to design a model notice, and distributed more than 400 copies to a variety of organizations across the state. Its report said the model notice was also available on the Washington State Clearinghouse on Human Trafficking website.

The law stipulated Commerce was to review the notice annually to ensure information stayed current. However, we found Commerce lacks a formal process to do so. Furthermore, an updated version does not exist, nor is a copy available on the Clearinghouse website.

Language in state law may contribute to Commerce not having an updated model notice

As currently framed, the law prohibits Commerce from using state funds to produce, print and post the notices, instead requiring the costs to be borne by a partner nonprofit. In its 2016 report, Commerce recommended removing this restriction because such costs to the state would be minimal and it can impede quick production of notices when there is a demand.

Commerce employees interviewed for this audit said the law could present a challenge now as well, adding they may not have understood what the law intended their agency's role to be in maintaining the model notice. They explained that there may not be enough interest in the notice to justify a review process, but acknowledged this may be because of the fact state law does not require establishments to post the notice.

The lack of interest could also stem from the fact establishments are not aware of the existence of a model notice or because a model notice is not readily available. Nonetheless, having an updated version of the model notice, well promoted and readily available, could encourage its use.

Some human trafficking laws and materials reference a disconnected telephone number

At one time, OCVA operated a telephone line for victims of all types of crime, not just human trafficking, but the agency disconnected it in 2024. Staff said this line was intended as a resource people could call for referral to a local crime victim services program. However, callers often expected immediate help and services that Commerce could not provide, resulting in confusion and disappointment. Staff also said that when it was active, the number typically received between 60 and 100 calls a month, primarily from people who were already connected with local services.

Commerce staff said the agency took several steps to communicate the disconnection

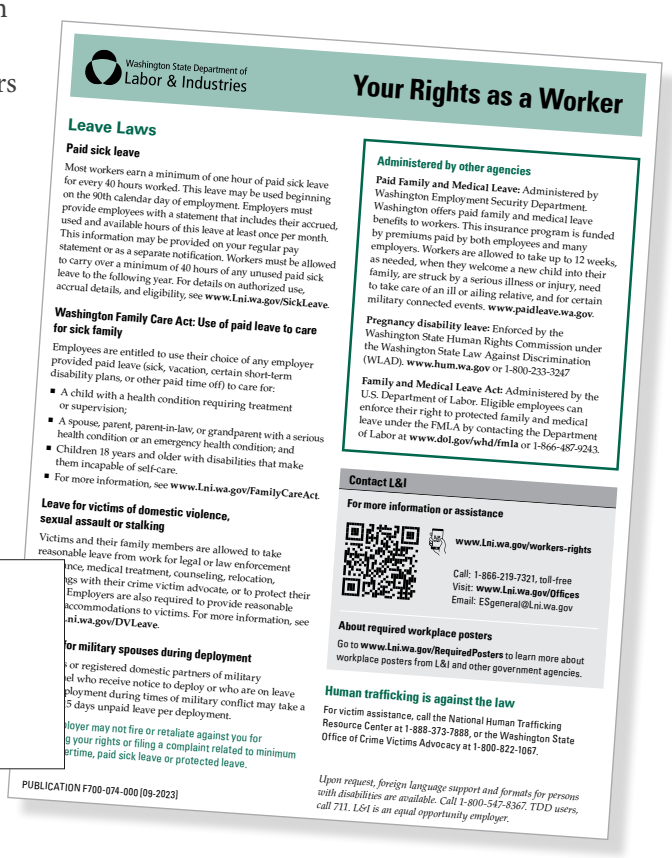
Commerce staff said that before disconnecting the number, the agency posted information on its website and emailed more than 600 contacts about the change. For several months during the disconnection process, the agency placed an automated message to help connect callers with alternative resources. Staff added that when they encounter the number somewhere, on a website or a brochure for example, they will ask the organization responsible to remove it.

The disconnected phone number still appears in awareness materials as well as several state laws, though other resources are typically also available

Despite Commerce's efforts to inform interested parties that the number was disconnected, several references to it remain in circulation. Fortunately, our review of currently available awareness materials found they typically listed other numbers or online directories in addition to the disconnected Commerce number.

- **At least two posters:** Two L&I posters – the "Know Your Rights" poster (illustrated in **Exhibit 4**), which all employers must display, and one for adult entertainment facilities – currently list the disconnected number.

Exhibit 4 – L&I's "Your Rights as a Worker" poster lists an inactive number after the National Hotline



Washington State Department of Labor & Industries

Your Rights as a Worker

Leave Laws

Paid sick leave

Most workers earn a minimum of one hour of paid sick leave for every 40 hours worked. This leave may be used beginning on the 90th calendar day of employment. Employers must provide employees with a statement that includes their accrued, used and available hours of this leave at least once per month. This information may be provided on your regular pay statement or as a separate notification. Workers must be allowed to carry over a minimum of 40 hours of any unused paid sick leave to the following year. For details on authorized use, accrual details, and eligibility, see **www.Lni.wa.gov/SickLeave**.

Washington Family Care Act: Use of paid leave to care for sick family

Employees are entitled to use their choice of any employer provided paid leave (sick, vacation, certain short-term disability plans, or other paid time off) to care for:

- A child with a health condition requiring treatment or supervision;
- A spouse, parent, parent-in-law, or grandparent with a serious health condition or an emergency health condition; and
- Children 18 years and older with disabilities that make them incapable of self-care.
- For more information, see **www.Lni.wa.gov/FamilyCareAct**.

Leave for victims of domestic violence, sexual assault or stalking

Victims and their family members are allowed to take reasonable leave from work for legal or law enforcement nce, medical treatment, counseling, relocation, gs with their crime victim advocate, or to protect their Employers are also required to provide reasonable accommodations to victims. For more information, see .ni.wa.gov/DVLeave.

or military spouses during deployment

or registered domestic partners of military el who receive notice to deploy or who are on leave ployment during times of military conflict may take a 5 days unpaid leave per deployment.

loyer may not fire or retaliate against you for g your rights or filing a complaint related to minimum ertime, paid sick leave or protected leave.

Administered by other agencies

Paid Family and Medical Leave: Administered by Washington Employment Security Department. Washington offers paid family and medical leave benefits to workers. This insurance program is funded by premiums paid by both employees and many employers. Workers are allowed to take up to 12 weeks, as needed, when they welcome a new child into their family, are struck by a serious illness or injury, need to take care of an ill or ailing relative, and for certain military connected events. **www.paidleave.wa.gov**.

Pregnancy disability leave: Enforced by the Washington State Human Rights Commission under the Washington State Law Against Discrimination (WLAD). **www.hum.wa.gov** or 1-800-233-3247

Family and Medical Leave Act: Administered by the U.S. Department of Labor. Eligible employees can enforce their right to protected family and medical leave under the FMLA by contacting the Department of Labor at **www.dol.gov/whd/fmla** or 1-866-487-9243.

Contact L&I

For more information or assistance

www.Lni.wa.gov/workers-rights

Call: 1-866-219-7321, toll-free
Visit: **www.Lni.wa.gov/Offices**
Email: ESgeneral@Lni.wa.gov

About required workplace posters

Go to **www.Lni.wa.gov/RequiredPosters** to learn more about workplace posters from L&I and other government agencies.

Human trafficking is against the law

For victim assistance, call the National Human Trafficking Resource Center at 1-888-373-7888, or the Washington State Office of Crime Victims Advocacy at 1-800-822-1067.

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Upon request, foreign language support and formats for persons with disabilities are available. Call 1-800-547-8367. TDD users, call 711. L&I is an equal opportunity employer.

Human trafficking is against the law

For victim assistance, call the National Human Trafficking Resource Center at 1-888-373-7888, or the Washington State Office of Crime Victims Advocacy at 1-800-822-1067.

Source: L&I.

However, these posters also do include the national hotline, and L&I has committed to updating both posters to remove the disconnected phone number. Of note, WSDOT's rest area poster, which is prominently displayed to travelers throughout the state, includes the national hotline and not the inactive Commerce number.

- A variety of **other organizations' websites** listed the disconnected number, including the King County Sexual Assault Resource Center, several Washington counties and the federal Office for Victims of Crime. They do contain other active telephone numbers or web links.
- **Three state laws** that concern human trafficking awareness posters (listed in the sidebar) still refer specifically to the now disconnected number. (All three laws also refer specifically to the national hotline number.) To ensure no one inadvertently adds a defunct number to a new resource or rule, the state law will need to be amended.

Laws that reference the disconnected number

- RCW 47.38.080: *WSDOT posters at rest areas*
- RCW 19.320.050: *L&I awareness posters and brochures*
- RCW 43.280.110: *Commerce model notice*

Better coordination could help ensure victims and others see only working contact numbers

In human trafficking crimes, criminals often exert such control over their victims that reaching out for help may seem nearly impossible. Victims may not have the capacity to call an alternative number listed on a poster if the first one they try is disconnected.

While Commerce staff said no one has contacted them with concerns about the disconnected telephone line, it is possible that the persistence of a wrong number could make it harder for someone in need to connect with services. The fact that this number still exists in several locations suggests some breakdown in communication between organizations working to provide resources for survivors of human trafficking and other crimes. Key groups involved in human trafficking awareness efforts should work together to update awareness laws and materials accordingly.

Commerce staff said they have not provided information to medical, mental health and social work groups in several years

State laws require OCVA to provide information on human trafficking to several specific organizations: the Washington Medical Commission, the Examining Board of Psychology, and the Mental Health Counselors, Marriage and Family Therapists, and Social Workers Advisory Committee. These organizations must distribute the information to their licensees.

However, Commerce staff said they have not sent materials on trafficking to these groups in several years, and what they last provided is now out of date. A page on the Department of Health website may be related to this requirement, but it has broken links and still refers to Commerce's disconnected telephone number.

Furthermore, OCVA lacks a process for maintaining these materials; staff explained that limited capacity may have been a contributing factor.

Some state laws and activities focus on sex trafficking, which can obscure the urgency of labor trafficking awareness

Researchers in the field of human trafficking and society's responses to it have observed that anti-trafficking efforts nationwide have historically focused on sex trafficking. A consequence of this choice is that it has led to less understanding that people can be trafficked into other forms of labor.

Leading practices today highlight the importance of awareness activities that encompass labor trafficking, to increase the likelihood people can identify it in reputable industries ranging from domestic service, farm work and construction. Even people caught up in the trade of illegal drugs may have been trafficked into participating and not of their own volition. Some states include labor trafficking in their awareness efforts. Florida, for example, requires a training for its public education employees to include information on the differences between sex trafficking and labor trafficking.

While many of Washington's human trafficking awareness efforts include labor trafficking, this is not always the case. We found several state laws that focused on sex trafficking. This focus on only one form of the problem has left the state with awareness activities that make little or no mention of labor trafficking. In these four examples, state law is specific to sex trafficking while omitting labor trafficking, yet the latter is also relevant to each situation.

- **Screening children.** State law requires DCYF and juvenile justice agencies to screen children for commercial sexual abuse of a minor, but not for labor trafficking. DCYF staff said they screen only for what the law requires; DCYF had considered also screening for labor trafficking but resource constraints prevented staff from doing so.
- **Training for criminal justice personnel.** State law requires Commerce to provide or coordinate training for criminal justice personnel on human trafficking. Sex trafficking specifically is mentioned twice in state law, but labor trafficking is not specifically mentioned at all. Commerce staff said for that reason, their training has focused on sex trafficking until recently. The first training incorporating information on labor trafficking was held in December 2024.
- **Education for students.** State law requires school districts to offer instruction in sex trafficking awareness and prevention to students. Most of the trafficking awareness materials, reviewed by OSPI and now

available on Washington's Open Educational Resources Hub, focus on sex trafficking.

- **Training for teachers.** State law requires teachers to complete a course on issues of abuse to receive initial certification as a teacher. It specifically mentions commercial sexual abuse of a minor and sexual exploitation of a minor, but not labor trafficking of children.

Both DCYF and OSPI staff said that awareness materials covering labor trafficking were difficult to find, and perhaps not even available to meet their needs. If national momentum for labor trafficking awareness continues, this situation may improve in the coming years. For example, the company that owns the screening tool DCYF uses has begun the process of adding questions for labor trafficking.

Leading practices and other states suggest Washington has other gaps and weaknesses in its awareness laws

Leading practices suggest other ways Washington might strengthen or expand its human trafficking awareness laws. This audit work reviewed leading practices for activities around trafficking awareness and compared them to Washington's state laws. (Some activities might be required under other laws or regulations, such as federal laws or local ordinances, but we did not examine them for this audit.) We could not confirm whether all suggested practices were happening somewhere in the state, although in some cases, we found information about actions conducted by audited agencies. It is important to remember that organizations beyond the audited agencies may be following these practices even though not required to do so.

The gaps we observed between leading practices and state law suggest ways Washington might improve its ability to identify cases of human trafficking. Without mandating certain awareness activities, there is a risk they are performed inconsistently across the entire state or not at all if they can be outweighed by competing priorities. Indeed, organizations point out several benefits to requiring activities in state law: doing so helps ensure they are enforceable, high quality, consistent and enduring. (Appendix C contains details about our research into leading practices and other states.)

Washington lacks state laws requiring training for certain categories of workers recommended by leading practices

Leading practices recommend, and other states require, trainings for people in jobs or workplaces where they are more likely to encounter possible victims. While Washington does require some trainings for relevant workers, we found gaps compared to leading practices.

In some cases, these workers are mandatory reporters of child abuse or neglect, and so may receive awareness training that at least to some extent covers human trafficking. In other cases, an organization is tasked with providing relevant training but the recommended workers are not actually required to take the training. For example, while Commerce administers a human trafficking training for groups including law enforcement, officers are not required to complete the training.

However, we found state laws do not mandate awareness training specifically about human trafficking for many categories of workers, including:

- **Other school personnel beyond teachers,** such as school counselors, extracurricular program staff that work with high-risk youth, or all school staff more broadly.
- **Health and mental health care professionals,** including nurses, physicians, therapists, emergency medical personnel, or health care workers or providers broadly. These professionals can be trained to recognize warning signs in trafficked patients, such as recurring visits for injuries or sexually transmitted infections while accompanied by a controlling person.
- **Employees of lodging facilities** like hotels or motels, places that may be common venues for trafficking. According to 2024 data from the National Human Trafficking Hotline for Washington, hotels or motels were the second-most common venue where sex trafficking was reported. A 2025 report by Polaris, a national anti-trafficking nonprofit organization, pointed out that labor trafficking is far from a rare occurrence in the hospitality industry as well.
- **Professionals who work with young people involved in the child welfare or juvenile justice systems,** including child welfare agency workers, juvenile justice agency workers, and foster parents or other caregivers. Such training may be especially important given that children or youth involved in the child welfare system may be disproportionately at risk of becoming victims of human trafficking. DCYF does conduct some awareness trainings for these workers even though not specifically required to do so by state law.
- **Law enforcement officers,** including police, sheriffs and related roles, as they may be the people most likely to encounter human traffickers and victims in their work responding to this and other crimes, including drug trafficking, domestic violence, and child abuse or neglect. While we found no Washington state law mandates training specifically dedicated to human trafficking for all law enforcement, some officers may encounter such training through various programs such as Commerce's training. Also, an administrative rule for carrying out the 2019 Law Enforcement Training and Community Safety Act states all general authority peace officers must complete a training that, among many other topics, includes topics related to human trafficking.

Washington also lacks nondiscretionary laws about signs in some locations recommended by leading practices

Leading practices recommend, and other states require, that various responsible agencies and organizations develop and display signs or posters in locations where potential victims or others may see them. Such signs include information on human trafficking so anyone can recognize its hallmarks, as well as who to contact for assistance. Posters are a popular, widely accepted tool across the country: Allies Against Slavery, a national nonprofit focused on using data to identify and eradicate human trafficking, reported that around 30 states require hotline postings in public or private establishments. California, for example, requires postering in 15 different types of "businesses and other establishments," covering transportation, lodging, health care, adult entertainment, and others such as farm labor contractors. Other states require awareness signs or posters in specific locations where possible victims or people likely to know a victim might encounter them.

Washington has some state laws about human trafficking awareness signs or notices, but the laws make the actions discretionary

Two state laws specifically address human trafficking awareness signs, but both are couched in discretionary language and so do not require entities to post the signs.

- **Rest areas.** WSDOT may place informational posters at rest areas, but this is not mandatory. As noted on page 18, WSDOT has voluntarily installed posters at rest areas across the state.
- **Public restrooms.** State law describes posting a notice on human trafficking for establishments that maintain restrooms for use by the public, but states establishments "may voluntarily" post such a notice.

There is always a risk that discretionary language lessens the chances a given action is actually carried out, especially in the longer term if budget and other circumstances change. For example, a third law states L&I may create a model disclosure form with information about services available to trafficking victims, for domestic employers of foreign workers and international labor recruitment agencies to give these workers. The law gave L&I discretion to conduct this activity, and L&I staff said that, lacking the resources, they did not create the model form. One mitigating factor in this particular case is that the U.S. Department of State is supposed to give foreign workers human trafficking information before they begin work with their employer.

Washington lacks state laws about signs in certain other recommended locations

Washington has no state laws about human trafficking awareness signs in other locations supported by leading practices and other states, which suggest signs at locations including:

- **Transportation facilities beyond rest areas,** such as airports, bus or rail stations, and even aboard buses and trains. According to a 2024 report by

the U.S. Department of Transportation's Advisory Committee on Human Trafficking, traffickers may use such facilities to transport victims or they may even target runaway youth and others more vulnerable to recruitment at bus or train stations.

- **Health care facilities,** such as emergency rooms, urgent care facilities, or locations for mental health and substance use treatment services.
- **Massage or bodywork facilities.** According to 2024 data from the National Human Trafficking Hotline for Washington, such facilities were the most prevalent venue where sex trafficking was reported.
- **Lodging facilities,** such as hotels or motels.
- **Adult entertainment facilities,** where people may be at higher risk of trafficking.

Washington's Task Force Against the Trafficking of Persons is well positioned to consider expanding the state's human trafficking awareness laws

Many Washington agencies and organizations voluntarily go above and beyond legally imposed activities to increase awareness of human trafficking. But by requiring the awareness activities described in this report into state law, and updating other laws as needed, Washington could increase the likelihood it can identify potential cases of human trafficking and connect survivors to services. Mandatory language in state law could help ensure such activities happen consistently across the state and that they endure, should agency or state-level priorities shift over time.

The Washington State Task Force Against the Trafficking of Persons serves as the main multidisciplinary entity charged with furthering the state's efforts to address all forms of human trafficking. Its diverse membership, including legislators, experts, nonprofit groups and state agencies, means the task force has a good knowledge of awareness efforts across the state. Its responsibilities include evaluating the impact and effectiveness of strategies in state law and making recommendations on legislation. For this reason, it is well positioned to consider updating and expanding Washington's human trafficking awareness requirements in state law, and how best to do so while considering resources and other challenges.

However, by adding activities to align state laws with leading practices, Washington's agencies may face resource concerns

Closing the gaps and weaknesses in state law described in this report, incorporating some recommended practices the state may not be conducting today, could help curb human trafficking.

There is, however, an inherent tension in doing more good work and the resources that are needed to do that good work. Audited agencies expressed concerns about the ability to fully implement new mandates in state law if the Legislature does not allocate adequate dedicated funding.

State Auditor's Conclusions

It's an unpleasant reality that human trafficking does happen in Washington. In acknowledging this fact, the state has an obligation to raise public awareness of its existence. More importantly, exploited people need to know help is available and they are not alone.

Washington's statewide efforts to raise awareness of human trafficking – both sex trafficking and labor trafficking – can help the public and victims identify it as a crime and connect survivors with services. This performance audit provides an important survey of those awareness efforts across five state agencies.

Those agencies addressed awareness in their areas of service, many voluntarily going over and above legal requirements. But the state's efforts overall are vulnerable to gaps and overlaps.

An example of one such risk is our finding that a telephone number mentioned in state law is no longer in service. The agency responsible for managing this number intended to use it to refer people to local crime victim services, but found it frequently confused callers who were looking for immediate help and decided to disconnect it. Nonetheless, other agencies continued to list the disconnected number on their posters and websites. That gap created the possibility that exploited people – having seen a poster and summoned the courage to call for help – had their calls go literally unanswered.

As a state, we must ensure our laws and materials are current and effective. This report includes a number of leading practices from other states, listed in more detail in an appendix. And we found the Washington State Task Force Against the Trafficking of Persons is well positioned to consider and recommend to legislators needed updates and expansions of state awareness requirements.

By better coordinating activities across the full range of involved public agencies, we can boost the chances that the ugly crime of human trafficking is exposed, and its survivors offered the help they need.

Recommendations

For Washington's Task Force Against the Trafficking of Persons

The following recommendations to the task force include working with relevant agencies to assess the resources necessary to accomplish any new requirement.

To better align Washington's state laws with leading practices, as discussed on pages 25-30, we recommend the task force:

1. Make recommendations to the Legislature, as needed, after evaluating whether the state's anti-trafficking efforts would be improved by doing the following:
    a) Establishing state laws for additional awareness activities, including for training and posters
    b) Strengthening requirements in state law to address those laws with discretionary language
    c) Incorporating labor trafficking requirements

To update obsolete references to the Department of Commerce's Office of Crime Victims Advocacy's direct service line in Washington state laws, as described on pages 23-24, we recommend the task force:

2. Work directly with its members, especially Commerce, WSDOT and L&I, to evaluate how the state laws (listed in the sidebar) that reference the disconnected phone number relevant to those agencies should be updated, and make a recommendation to the Legislature accordingly.

Laws that reference the disconnected number

- RCW 47.38.080: *WSDOT posters at rest areas*
- RCW 19.320.050: *L&I awareness posters and brochures*
- RCW 43.280.110: *Commerce model notice*

For the Department of Commerce's Office of Crime Victims Advocacy

To address issues with the model notice on human trafficking, as described on page 22, we recommend Commerce:

3. Develop a process for regularly reviewing the model notice to ensure the information remains accurate and aligned with leading practices
4. Work with the task force to determine whether and how the state's anti-trafficking efforts would be improved by having a current Washington model notice on human trafficking, including:
    a) Clarifying roles and responsibilities around creating, posting and distributing the notice

b) Determining whether the language in state law that prohibits state funds from being used in the production, printing and posting of the model notice should be removed

c) Determining whether the state law needs to be updated to reflect the above decisions (and, if so, make recommendations to the Legislature accordingly)

d) Determining whether it would be valuable to post an up-to-date version of the model notice on the Washington State Clearinghouse on Human Trafficking website

To remove obsolete references to the Department of Commerce's Office of Crime Victims Advocacy phone number, as described on pages 23-24, we recommend Commerce:

5. Conduct an internet search for the Office of Crime Victims Advocacy phone number, and inform any organizations still publicizing the number that it is no longer active

To address outdated human trafficking awareness information for medical, mental health and social work groups, as described on page 24, we recommend Commerce:

6. Review the information previously provided to the Department of Health (as listed on its website), and supply any needed updates to the organizations listed in state law
7. Develop a process to ensure that materials are periodically reviewed, updated and distributed

Guidance for all governments involved in human trafficking awareness efforts in Washington

We made recommendations to the statewide Task Force Against the Trafficking of Persons to better align Washington's human trafficking awareness laws with leading practices. However, we consider the audit results so broadly applicable that it is in Washington's best interest for all state agencies and local governments involved in such efforts to consider whether they have opportunities to better align their efforts with leading practices.

We therefore suggest these governments consider implementing the practices described in this report, either within available resources or by pursuing additional funding. This might include participating in activities that are not yet required by state law.

We especially encourage governments to expand their current activities to also address labor trafficking, if it is not already part of their efforts. By doing so, all governments could help improve Washington's ability to identify cases of human trafficking.

Agency Response

STATE OF WASHINGTON

July 15, 2026

Honorable Pat McCarthy
Washington State Auditor
P.O. Box 40021
Olympia, WA 98504-0021

Dear Auditor McCarthy:

We have reviewed the State Auditor's Office (SAO) performance audit report "Assessing Washington's State-Level Human Trafficking Awareness Efforts."

We appreciate the work done by the State Auditor's Office to understand Washington's statewide efforts to raise awareness of human trafficking and agree with the recommendations.

While not a direct recommendation from the audit, the Department of Labor and Industries (L&I) has updated the Workers' Rights poster to remove the inactive 1-800 number that was previously included on that poster. L&I has also updated the Adult Entertainment poster to remove the inactive 1-800 number.

We look forward to supporting the efforts of Washington's Task Force Against the Trafficking of Persons to help determine any needed updates to Washington's laws.

Thank you for your work on this important topic.

Sincerely,

K.D. Chapman-See
Director
Office of Financial Management

Tana Senn
Secretary
Department of Children, Youth, and Families

Sarah Clifthorne
Interim Director
Department of Commerce

Joel Sacks
Director
Department of Labor and Industries

Julie Meredith
Secretary
Department of Transportation

cc: Shane Esquibel, Chief of Staff, Office of the Governor
Franklin Plaistowe, Chief Operations Officer, Office of the Governor
Debbie Driver, Legislative Director, Office of the Governor
Kenneth Martin, Policy Director, Office of the Governor
Jesse Jones, Director, Your Washington, Office of the Governor
Scott Frank, Director of Performance Audit, Office of the Washington State Auditor
Tammy Firkins, Performance Audit Liaison, Your Washington, Office of the Governor

Official Response to the Performance Audit on Assessing Washington's State-Level Human Trafficking Awareness Efforts — July 15, 2026

The Departments of Children, Youth, and Families (DCYF); Commerce; Labor and Industries (L&I); Transportation (WSDOT); and the Office of Financial Management (OFM) provide this management response to the State Auditor's Office (SAO) performance audit report received June 15, 2026.

SAO Performance Audit Objectives:

The SAO's performance audit addressed three questions:

1. What state-level human trafficking awareness activities does Washington state law require, and which agencies participate in those efforts?
2. What practices related to human trafficking awareness do other states use or leading practices recommend?
3. How might Washington improve its efforts to identify human trafficking compared to state law, other states or leading practices?

SAO's recommendations 1-2 are to Washington's Task Force Against the Trafficking of Persons.

SAO's Recommendations 3–7 to Commerce's Office of Crime Victims Advocacy (OCVA) in brief:

SAO Recommendation 3-4: To address issues with the model notice on human trafficking:

3. Develop a process for regularly reviewing the model notice to ensure the information remains accurate and aligned with leading practices

Agree to implement

4. Work with the task force to determine whether and how the state's anti-trafficking efforts would be improved by having a current Washington model notice on human trafficking, including:
   a. Clarifying roles and responsibilities around creating, posting and distributing the notice
   b. Determining whether the language in state law that prohibits state funds from being used in the production, printing and posting of the model notice should be removed
   c. Determining whether the state law needs to be updated to reflect the above decisions (and, if so, make recommendations to the Legislature accordingly)
   d. Determining whether it would be valuable to post an up-to-date version of the model notice on the Washington State Clearinghouse on Human Trafficking website

Agree to implement

STATE RESPONSE:
OCVA agrees with both recommendations. The agency will take the following steps:

Action Steps and Time Frame (Quarterly)

- Review recommendation and identify next steps with Human Trafficking Task Force. *By August 26, 2026.*
- Make final determinations per SAO points b, c, and d. *By November 30, 2026.*

SAO Recommendation 5: To remove obsolete references to the Department of Commerce's Office of Crime Victims Advocacy phone number:

5. Conduct an internet search for the Office of Crime Victims Advocacy phone number, and inform any organizations still publicizing the number that it is no longer active

Agree to implement

STATE RESPONSE:
OCVA informed grantees and partners when the phone number was initially to go inactive. OCVA will conduct another review and notification round.

Action Steps and Time Frame

- Conduct internet search and send emailed notifications. *By August 31, 2026.*

SAO Recommendation 6-7: To address outdated human trafficking awareness information for medical, mental health and social work groups:

6. Review the information previously provided to the Department of Health (DOH) (as listed on its website), and supply any needed updates to the organizations listed in state law

Agree to implement

7. Develop a process to ensure that materials are periodically reviewed, updated and distributed

Agree to implement

STATE RESPONSE:
OCVA will receive consultation regarding priority areas and information to include for medical, mental health, and social work groups due to their unique areas of focus and clients served.

Action Steps and Time Frame

- Develop factsheet / resource sheet and provide to DOH. *By September 30, 2026.*
- Develop and implement an annual review process. *By December 31, 2026.*

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Olympia, WA 98504-7200

ospi.k12.wa.us

Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

July 14, 2026

Mr. William Wright, Principal Performance Auditor
Office of the Washington State Auditor
Insurance Building, PO Box 40021
Olympia, WA 98504-0021

Re: Washington's State-Level Human Trafficking Awareness Efforts

Dear Mr. Wright,

We at the Office of Superintendent of Public Instruction (OSPI) appreciate the work done to evaluate Washington's statewide efforts to raise awareness of human trafficking. This work serves an important purpose in preventing trafficking and ensuring that people who have experienced exploitation receive the support they need.

Legislation passed in 2023 that requires all schools to provide sex trafficking prevention and awareness instruction at least once for all students between grades 7 and 12. The law also required OSPI, subject to funding from the legislature, to review instructional materials and post eligible materials on our Open Education Resources Hub. Despite funding not being provided, OSPI did complete those activities, along with developing guidance for school districts and providing professional development for educators on how to deliver sex trafficking related instruction in ways consistent with best practices.

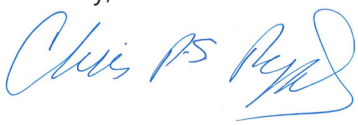
The Office of Superintendent of Public Instruction is proud of the work we have done to address legislative requirements and support school-based instruction that will assist in keeping students safe from exploitation. While your audit did not include any recommendations specific to our agency, we intend to:

- Continue reviewing sex trafficking related instructional materials in our annual reviews of comprehensive sexual health education materials.
- Continue posting eligible materials on our Open Education Resources Hub.
- Continue to include sex trafficking resources in our Health/Sexual Health newsletters.

- Continue to provide professional development to educators on best practices related to sex trafficking awareness and prevention instruction.

If you have further questions or comments, please contact Andra Kelley-Batstone at 360-870-1699 or email andra.kelley.batstone@k12.wa.us.

Sincerely,



Chris Reykdal
Superintendent of
Public Instruction

cc: Andra Kelley-Batstone, Assistant Superintendent of Teaching, Learning, and School Improvement
Katie Taylor, Director of Secondary Education Content
Denise Davis, Director of Elementary Education Content

Note: Although the state's Task Force Against the Trafficking of Persons was not audited for this project, its role in furthering the state's efforts to address human trafficking is of such relevance that we made several recommendations for its consideration (see page 32). Task force leadership responded to our recommendations, and below we summarize their remarks.

Action step	Action step description (if developed)	Planned completion date	Description of current status and other notes
Recommendation #1. The task force agrees to implement this recommendation; Commerce will be the lead agency.			
1.1	Review and discuss current state laws specific to awareness activities; identify gaps or barriers to address – including shifting away from discretionary language and incorporating labor trafficking	12/31/26	Will use next two scheduled task force meetings to complete the task.
1.2	Finalize and distribute recommendations to legislature	3/31/27	Will complete by planned completion date.
Recommendation #2. The task force agrees to implement this recommendation; Commerce will be the lead agency. It is already partially implemented: OCVA and L&I have met and discussed next steps.			
2.1	Send email to HT Task Force with clarification phone number is not active	08/15/26	Will complete by planned completion date.
2.2	Provide reminder to HT Task Force at next scheduled meeting	08/26/26	Will complete by planned completion date.
2.3	Google expired phone number and follow up with relevant agencies who are continuing to use	08/15/27	Will complete by planned completion date.

Appendix A: Initiative 900 and Auditing Standards

Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor's Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor's Office to "review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts." Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies 10 elements that are to be considered within the scope of each performance audit. The State Auditor's Office evaluates the relevance of all 10 elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	**No.**
2. Identify services that can be reduced or eliminated	**No.**
3. Identify programs or services that can be transferred to the private sector	**No.**
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	**No.**
5. Assess feasibility of pooling information technology systems within the department	**No.**
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	**No.**

I-900 element	Addressed in the audit
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	**No.** However, we do recommend that Washington's Task Force Against the Trafficking of Persons evaluate ways to improve the state's human trafficking awareness laws and make recommendations to the Legislature as needed.
8. Analyze departmental performance data, performance measures and self-assessment systems	**No.**
9. Identify relevant best practices	**Yes.** This audit identified human trafficking awareness activities recommended by leading practices and other states.
10. Analyze the social equity impact of programs or services	**No.**

Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in *Government Auditing Standards* (July 2018 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The mission of the Office of the Washington State Auditor

Our mission is to promote accountability and transparency in government. We work with state agencies, local governments and the public to achieve our vision of increasing public trust in government by helping governments work better and deliver higher value. The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic subscription service. We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program. For more information about the State Auditor's Office, visit www.sao.wa.gov.

Appendix B: Objectives, Scope and Methodology

Objectives

The purpose of this performance audit was to review the state's approach to raising awareness about human trafficking in Washington by reviewing methods used by a selection of state agencies. The audit addressed the following objectives:

1. What state-level human trafficking awareness activities does Washington state law require, and which agencies participate in those efforts?
2. What practices related to human trafficking awareness do other states use or leading practices recommend?
3. How might Washington improve its efforts to identify human trafficking compared to state law, other states or leading practices?

For reporting purposes, we organized the audit results into three key findings. The messages relate to the original objective as follows:

- Selected state agencies carried out many required and recommended human trafficking awareness activities (pages 12-20) – This finding addresses Objectives 1 and 3.
- Updating state laws and some agency materials could improve Washington's human trafficking awareness activities (pages 21-30) – This finding addresses Objectives 1, 2 and 3.

Scope

This audit focused on state-level human trafficking awareness activities, such as informing the public through posters or providing training to increase knowledge of the signs of human trafficking. We did not assess other efforts to address human trafficking, including law enforcement or the provision of survivor services. Local governments, nongovernmental organizations and private businesses also have responsibilities, but they were outside the scope of our audit work.

This audit examined whether five selected state agencies implemented human trafficking awareness activities required by law. It also compared Washington laws to leading practices and those applied in other states. Each of these audit areas is described below.

Selected state agencies' implementation of human trafficking awareness requirements in state law

While many state agencies are tasked with and conduct human trafficking awareness efforts, we selected only five state agencies due to their important responsibilities in existing state laws and the specific populations they work with. These agencies are listed in the sidebar.

We focused on the audited agencies' awareness activities conducted during our fieldwork period. In a few instances, we also included information about their relevant past activities. In addition, we recorded some auditee activities that were above and beyond what state law requires, though we did not test these as thoroughly as we did legal requirements.

State agencies included in this audit

- Department of Children, Youth, and Families (DCYF)
- Department of Commerce
- Department of Labor & Industries (L&I)
- Department of Transportation (WSDOT)
- Office of Superintendent of Public Instruction (OSPI)

Review of Washington state laws compared to leading practices and those of other states

We also sought to understand how Washington might improve its human trafficking awareness state laws. For this work, we reviewed leading practices, including those used by other states, and compared them to Washington's laws to identify potential gaps and weaknesses.

For our review of laws, we focused on state laws requiring activities specifically dedicated to human trafficking awareness. We did not comprehensively evaluate other laws or regulations, including those that require other training or posters that might include human trafficking to some extent but were not specifically focused on awareness.

Methodology

We obtained the evidence used to support the findings, conclusions and recommendations in this audit report during our fieldwork period (August 2025 to March 2026), with some additional follow-up work afterward. We have summarized the work we performed to address each of the audit objectives in the following sections.

Objective 1: What state-level human trafficking awareness activities does Washington state law require, and which agencies participate in those efforts?

To address this objective, we searched for and reviewed Washington state laws and administrative rules specifically dedicated to human trafficking awareness. To confirm and better understand relevant requirements for selected state agencies, we interviewed or emailed staff.

Figure 1 lists the state laws and administrative rules referred to in the body of the report. It is not a comprehensive list of all state laws and administrative rules related to human trafficking or other efforts more broadly.

Figure 1 – State laws and administrative rules relevant to this audit

Notes whether it was assessed for compliance with requirements as part of audit work

Washington law or administrative rule	Summary of requirement	Assessed for compliance
RCW 26.44.275	DCYF must use a validated assessment tool to screen children for commercial sexual abuse of a minor	**Yes**
RCW 26.44.030(23)	DCYF shall publish a poster on its website that includes requirements to report child abuse or neglect (which includes trafficking)	**Yes**
	Organizations with mandatory reporters must clearly display this poster in a common area	No
RCW 43.280.095	Commerce's OCVA shall administer a statewide training program on human trafficking for law enforcement personnel, prosecutors and court personnel	**Yes**
RCW 43.280.110	Commerce's OCVA shall initially approve, and then annually review, a model notice on human trafficking for public restrooms	**Yes**
	Establishments with public restrooms may voluntarily post the notice	No
RCWs 18.83.090, 18.71.080, 18.225.040	Commerce's OCVA shall provide the following entities with information on human trafficking: Examining Board of Psychology Washington Medical Commission Mental Health Counselors, Marriage and Family Therapists, and Social Workers Advisory Committee	**Yes**
	These entities must share the information with licensees	No
RCW 19.320.020	Domestic employers of foreign workers and international labor recruitment agencies must provide foreign workers with a statement that includes a hotline and services for potential trafficking victims (unless the foreign worker receives an informational pamphlet under a federal act)	No
	L&I may create a model disclosure form for use by these entities	**Yes**
RCW 19.320.050	L&I shall integrate information on assisting victims of human trafficking in posters and brochures, as deemed appropriate by the department	**Yes**
RCW 49.17.470(1)	L&I shall develop, or contract for the development of, training for entertainers which must include the risk of human trafficking	**Yes**
	Entertainers must provide proof they took the training in order to receive or renew their license, which is issued by a local government	No

Figure 1 – State laws and administrative rules relevant to this audit, *continued*

Notes whether it was assessed for compliance with requirements as part of audit work

Washington law or administrative rule	Summary of requirement	Assessed for compliance
RCW 47.38.080	Describes actions WSDOT may take regarding informational posters at rest areas, including working with advocates to develop posters	**Yes**
RCW 28A.320.168	School districts must offer instruction in sex trafficking awareness and prevention to students at least once between grade seven and graduation	No
	OSPI must review curricula, subject to the availability of amounts appropriated, and make resources available in a library of openly licensed courseware, to the extent practicable	**Yes**
RCW 28A.410.035	Teachers shall successfully complete a course on issues of abuse, including commercial sexual abuse of a minor, in order to receive initial certification	No
WAC 308-100-033	Trainings for commercial driver's licenses must include a 30-minute "Truckers Against Trafficking" training	No
WAC 139-11-020	All new general authority peace officers must complete violence de-escalation and mental health training, which – among many other topics – includes topics related to human trafficking	No

Objective 2: What practices related to human trafficking awareness do other states use or leading practices recommend?

To understand what promising practices other states use related to human trafficking awareness, we:

- Reviewed reports from national organizations with information on human trafficking awareness activities required by statute in all 50 states
- Conducted an in-depth review of laws and efforts in five states: Florida, California, Tennessee, Texas and Minnesota. We selected these states based on their rankings in national scorecards, feedback from audited agencies and other organizations and initial online research.

The review of other states above focused on statute, and not administrative rules or regulations.

To understand what leading practices are recommended to improve human trafficking awareness, we identified and reviewed reports, articles and other information developed by national organizations and experts in 2020 and later.

The national reports and leading practices sources we reviewed are listed in the Bibliography.

Objective 3: How might Washington improve its efforts to identify human trafficking compared to state law, other states or leading practices?

We addressed this objective in two parts. First, we determined whether selected state agencies were implementing existing human trafficking awareness requirements set out in state law. Second, we compared state law to leading practices and those used in other states to identify any potential opportunities for improvement.

Opportunities to improve selected state agencies' implementation of human trafficking requirements in state law

To determine to what extent audited agencies complied with their responsibilities under Washington state law, as well as any challenges they face in implementing requirements, we:

- Requested and reviewed documentation from audited agencies (for example, reports, posters and training agendas or descriptions)
- Conducted online research to review relevant agency websites and identify relevant agency reports
- Interviewed employees at audited agencies

Opportunities to improve Washington's state laws overall compared to leading practices and other states

We compared Washington laws to leading practices and laws in other states to identify gaps and weaknesses. This work included:

- Identifying leading practices not present in Washington law
- As some leading practices sources highlighted the benefits of requiring human trafficking awareness activities in state law, we identified laws with discretionary or non-binding language
- As some leading practices highlighted the importance of including labor trafficking in awareness efforts, we identified laws that focused only on sex trafficking. We also compiled examples of audited agencies' practices to determine whether they focused only on sex trafficking by reviewing documentation and interviewing employees.

To better understand the gaps and weaknesses identified via the work described above, including causes and effects, we interviewed and emailed employees at audited agencies and Washington's Task Force Against the Trafficking of Persons.

Work on internal controls

We gained an understanding of selected state agencies' internal controls for ensuring they implemented human trafficking awareness activities according to state law. We assessed the design of these internal controls through interviews and a review of any available policies or procedures to understand processes for ensuring compliance. We did not evaluate the implementation of internal controls or their operating effectiveness.

Appendix C: Details on Leading Practices Research

This appendix provides detailed information from our research into leading practices that were discussed in the report. Practices recommended in literature and required by state law in other states suggest various types of human trafficking awareness activities, some more frequently than others.

The figures summarize three thematic categories:

- Figure 2: Screening
- Figure 3: Training
- Figure 4: Posters

See the Bibliography for detailed sources of reports cited in each figure. Also see Appendix B for more details about our review of laws in other states, both nationally and in five states (California, Florida, Minnesota, Tennessee and Texas). Note that if a row in the tables below has no results under "National review," it means that information was not available for that activity. Similarly, if a state is not mentioned under "Five states review" in the tables below, it means we found no relevant laws requiring the specific activity in that row.

Figure 2 – Leading practices to screen children for human trafficking

Who should screen	Activity advised by leading practices	Laws in other states
Child welfare agencies, juvenile justice agencies	Sources broadly advised screening children for human trafficking or commercial sexual exploitation. Some also advised screening for labor trafficking of children specifically. **Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Shared Hope's 2023 Toolkit* *Toolkit for Responding to Human Trafficking Through the Child Welfare System*	**National review** Around 15 states require screening children for sex trafficking **Five states review** • *Florida, Tennessee, Texas:* Require screening for child sex trafficking • *Minnesota*: Requires screening for human trafficking if child or youth is missing from care and then located **Labor trafficking specifically** • 13 of 25 state child welfare agencies reviewed by RTI International in 2022 screened for labor trafficking

Figure 3 – Leading practices around human trafficking awareness training for certain groups

Who should receive training	Activity advised by leading practices	Laws in other states
Law enforcement	**Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Understanding and Improving Law Enforcement Investigations of Human Trafficking* *Understanding What Works in the Successful Identification, Investigation, and Prosecution of Labor Trafficking Cases in the United States*	**National review** Required in around 20 states **Five states review** • *California, Florida, Tennessee, Texas:* Require this training
Child welfare agency workers	**Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Reframing Human Trafficking Awareness Campaigns in the United States* *Shared Hope's 2023 Toolkit* *Toolkit for Responding to Human Trafficking Through the Child Welfare System* *Understanding the Trafficking of Children for the Purposes of Labor in the United States*	**National review** Sex trafficking awareness training required in around 10 states **Five states review** • Required in all five states
Juvenile justice agency workers	**Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Safe House Project's Evaluation of Survivor Identification & Safe Housing by State* *Shared Hope's 2023 Toolkit*	**National review** Sex trafficking awareness training required in around 5 states **Five states review** • *Florida:* Requires training for juvenile probation staff • *Texas:* Requires training for juvenile correctional officers
Foster parents or child caregivers	For foster parents, caregivers and workers of youth congregate care settings **Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Reframing Human Trafficking Awareness Campaigns in the United States* *Toolkit for Responding to Human Trafficking Through the Child Welfare System*	**Five states review** • *California:* Requires training for caregivers • *Florida:* Requires training for foster parents and child caregivers, including staff at child-caring agencies, foster homes or safe houses

Figure 3 – Leading practices around human trafficking awareness training for certain groups, *continued*

Who should receive training	Activity advised by leading practices	Laws in other states
Teachers	**Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *A Public Health Approach to Preventing Human Trafficking* *Reframing Human Trafficking Awareness Campaigns in the United States*	**National review** Required in around 10 states **Five states review** • *Florida, Tennessee, Texas:* Require this training
Other school staff or personnel beyond teachers	For various staff including school counselors, extracurricula staff that work with high-risk youth, and all school staff or personnel more broadly **Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Reframing Human Trafficking Awareness Campaigns in the United States* *Shared Hope's 2023 Toolkit* *Understanding the Trafficking of Children for the Purposes of Labor in the United States*	**National review** Sex trafficking awareness training required of "school personnel" in around 10 states **Five states review** • *Florida:* Requires training for education staff who have contact with students • *Tennessee, Texas:* Require training for school employees
Students	Commonly, for students in middle and high school **Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *Reframing Human Trafficking Awareness Campaigns in the United States* *Shared Hope's 2023 Toolkit*	**National review** Required in around 10 states **Five states review** • *California, Florida, Tennessee:* Require this training
Health and behavioral health care professionals	For professionals including nurses, physicians, therapists, or health care workers and providers broadly **Examples of sources** *National Advisory Committee's Best Practices and Recommendations for States* *A Public Health Approach to Preventing Human Trafficking* *Reframing Human Trafficking Awareness Campaigns in the United States*	**Five states review** • *California:* Requires training for Emergency Medical Technicians (EMTs) • *Florida, Texas:* Require training for various healthcare professionals including doctors and nurses

Figure 3 – Leading practices around human trafficking awareness training for certain groups, *continued*

Who should receive training	Activity advised by leading practices	Laws in other states
Employees of lodging facilities (such as hotels or motels)	For staff working in hospitality, broadly **Examples of sources** *Polaris' Closing the Door on Labor Trafficking in the Hospitality Industry* *Safe House Project's Evaluation of Survivor Identification & Safe Housing by State*	**National review** Required in around 10 states **Five states review** • *California, Minnesota:* Require this training for hotel or motel staff • *Florida, Texas:* Require this training for staff at lodging establishments
Commercial drivers or truckers	**Examples of sources** *U.S. Department of Transportation's Preventing and Addressing Human Trafficking in the Transportation Sector* *Training Employees to Recognize Industry-Relevant Indicators of Sex Trafficking*	**National review** Required in around 10 states **Five states review** • *Texas:* Requires this training for commercial driver's licensees

Figure 4 – Leading practices around human trafficking awareness signs in specific locations

Where signs should be placed	Activity advised by leading practices	Laws in other states
Transportation facilities	In locations including airports, buses and bus stations, and rest areas or truck stops **Examples of sources** *The Contribution of State and Local DOTs to Disrupting Human Trafficking* *U.S. Department of Transportation's Preventing and Addressing Human Trafficking in the Transportation Sector*	**Five states review** • *California, Florida, Texas:* Require signs in locations including airports, rail stations, bus stations and transportation hubs
Health care facilities	**Examples of sources** *2021 National Action Plan to Combat Human Trafficking* recommended posting materials in emergency rooms, urgent care facilities, and locations for mental health and substance use treatment services	**Five states review** • *California, Florida, Texas:* Require signs in health care facilities, commonly in emergency rooms
Massage/bodywork facilities	Not a theme in the literature we reviewed	**Five states review** • *California, Florida, Texas:* Require signs

Figure 4 – Leading practices around human trafficking awareness signs in specific locations, *continued*

Where signs should be placed	Activity advised by leading practices	Laws in other states
Lodging facilities	Not a theme in the literature we reviewed	**National review** Required in around 25 states **Five states review** • *California:* Hotels, motels and bed & breakfast inns • *Florida:* Public lodging establishments • *Minnesota:* Hotels and motels • *Texas:* Commercial lodging establishments
Adult entertainment facilities	Not a theme in the literature we reviewed	**Five states review** • *California, Florida, Tennessee, Texas:* Require posters in adult or sexually oriented businesses

Additional awareness activities

In addition to these commonly mentioned activities, both leading practices and other states embrace a wide variety of other activities to raise awareness of human trafficking. Among them, we noted:

- **Training for staff at state agencies,** such as departments of Health, Human Services, Transportation, or Labor and Workforce Development
- **Training for criminal justice personnel,** including prosecutors, defense attorneys, corrections staff, probation officers and more
- **Training for workers of certain businesses,** including people who regularly enter people's homes (such as code inspectors or home repair workers), tattoo operators and artists, and servers
- **Education for people who may be more at risk,** including vulnerable workers (such as temporary visa holders) or children and youth in the care of child welfare and juvenile justice systems
- **Training for people who work with at-risk populations,** such as service providers (including staff of housing programs or shelters and immigration service providers) and community leaders, especially in historically marginalized communities
- **Posters in other locations,** such as schools, farm labor contractors' facilities, job recruitment centers and tattoo shops
- **Other awareness campaigns.** This diverse category included awareness campaigns leading up to major events such as the Super Bowl; online activities including social media outreach and websites run by state agencies designed in part to raise awareness; and electronic notices with tickets for events at concert halls, stadiums, theaters and more.

Some literature also discussed the importance of *state-level monitoring and evaluation of human trafficking awareness activities* broadly. A 2020 report by the National Advisory Committee on the Sex Trafficking of Children and Youth recommended tracking and evaluating public awareness activities and reporting on them to the state legislature or governor's office. Similarly, a 2023 research article titled Reframing Human Trafficking Awareness Campaigns cited the importance of testing awareness materials before committing financial resources, to study both intended and unintended consequences.

Specific ways awareness efforts can be made more effective or better at reaching people who are more at risk

In our review of leading practices and practices in other states, we found information on specific ways to help trainings, posters or other awareness activities be more effective or better reach those more at risk of human trafficking. This includes the following:

- **Inclusive language and imagery.** Use multiple languages in signs and ensure the language used is understandable by people with diverse reading abilities. Also ensure materials are inclusive of gender identities, race and ethnic differences. Some other states have requirements that signs must include English and one or more other languages.
- **Develop materials by working with survivors with lived experience in human trafficking.** A 2023 research article titled "Reframing Human Trafficking Awareness Campaigns" said this is "fundamental" to the success of these and other anti-trafficking efforts. Some states codify this in statute; for example, California and Florida laws specify that training should be developed in consultation with survivors.
- **Ensure messaging uses accurate, respectful content and language.** Multiple sources offered guidelines for the content and language to use in signs, recommending developers avoid oversimplification, misconceptions, stereotyping or sensationalizing the issue of human trafficking. For example, images that rely on the most violent examples, such as victims behind bars, can reinforce the common misconception that victims are physically restrained and not exploited through fraud, coercion or other means.
- **Tailor content to the context.** Multiple reports discussed the importance of tailoring content to the context of the message. For example, a culturally responsive approach to education intended to help identify human trafficking in Native American communities might include content on historical trauma or integrate education into traditional practices. (Illustrated in the panel on the following page.)
- **Provide ongoing or refresher trainings.** Workplaces that experience high rates of staff turnover can particularly benefit from making awareness trainings regularly available; doing so also helps ensure trainings can incorporate the latest tools and research. In our review of other states, we found many laws that require trainings to be annual or periodic.
- **Include certain topics in trainings.** In addition to core topics of how to identify and respond to potential cases of human trafficking, some leading practices also suggest including information on how systemic socio-economic and other barriers that can increase a person's risk of becoming a victim of human trafficking.

Example of a poster tailored to Indigenous survivors of trafficking

In 2022, Washington House Bill 1571 directed Commerce's OCVA to award grants for services and resources for Indigenous survivors of trafficking. The poster below was created by one of the grantees to increase awareness of human trafficking in Indigenous communities. It contains imagery and resources relevant to that specific context, including the website of an organization focused on serving Indigenous survivors of violence.

The law that created this program expired in January 2024.

Source: 2023 "Services for Indigenous Survivors of Human Trafficking" report by the Department of Commerce for the Legislature pursuant to the bill.

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– Pat McCarthy, State Auditor

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