



7.3.15 PREVENTION OF TRAFFICKING

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References: 22 U.S.C. §7104

Policy Owner: Sonoma County Behavioral Health Division – Quality Assessment and Performance Improvement (QAPI), Quality Assurance (QA) Manager – Substance Use Disorder (SUD)

Director Signature: **Signature on File**

I. Policy Statement

Sonoma County Department of Health Services – Behavioral Health Division (DHS-BHD) Substance Use Disorder (SUD) and Community Recovery Services Section will fully comply with all relevant federal and state laws, regulations, and contractual requirements, with special regard to the Trafficking Victims Protection Act (TVPA) of 2000, 22 United States Code (U.S.C.) §7104(g) - Prevention of Trafficking.

II. Scope

This policy applies to all covered persons and includes all County of Sonoma employees (full-time, part-time, extra-help), and all additional persons who are performing services for DHS, with the exception of Community Based Organization (CBO) staff.

III. Definitions

Not Applicable

IV. Policy

The DHS-BHD SUD section ensures that any grant, contract, or cooperative agreement provided or entered by DHS-BHD includes a condition that authorizes

other remedial actions, up to and including termination, if the contract provider participates in or uses labor recruiters, brokers, or other agents who engage in:

- A. Severe forms of trafficking persons;
- B. Use of forced labor in the performance of the contract;
- C. Destroying, removing, concealing, denying access to an employee's identity or immigration documents;
- D. Failing to provide return transportation to an employee recruited from another country;
- E. Soliciting a person for purposes of employment, by means of false or fraudulent promises regarding that employment;
- F. Charging recruited employees unreasonable placement fees;
- G. Providing housing that fails to meet housing and safety standards.

V. Procedures

- A. The DHS-BHD Quality Assessment and Performance Improvement (QAPI), Auditing and Monitoring Team (AMT), will conduct annual monitoring site visits of all its SUD programs, including contracted providers. To increase awareness of the issue, and to assist victims exploited through labor and sex trafficking in the United States, QAPI AMT will monitor:
 - 1. Providing Trafficking Victims Protection Act (TVPA) of 2000 training/information annually to employees;
 - 2. Maintaining documentation and confirming training attendance.
- B. Upon receipt of an Inspector General's report substantiating an allegation of trafficking, DHS-BHD is authorized and prepared to take one or more of the remedial actions described in 22 U.S.C. §7104, up to and including termination of the program or contract.

VI. Forms

None

VII. Attachments

None