



## **EIGHT YEARS OF FEDERAL PROCUREMENT POLICIES DEMONSTRATE THE IMPACT TO PREVENT TRAFFICKING GLOBALLY**



### General Overview

- After new Anti-Trafficking prevention measures in federal procurement were enacted from 2017, **there have been 180+ investigations related to forced labor in federal contracts initiated to better protect workers.** Overall, contractors took curative actions to prevent trafficking and protect workers as a result of these investigations.
- **New protective measures resulted in only one Federal contract in 8 years having to be terminated and one entity being debarred from conducting further business with the Federal Govt.<sup>1</sup> In the more all the other 180+ investigations described in the 2017-2024 TIP Reports, terminations were not mentioned, instead cure notices and/or termination of personnel were issued to address human trafficking.**

### Investigations and Outcomes

Every year after the US Government enacted new protections in federal contracts to prevent trafficking, the U.S. Trafficking in Persons ("TIP") Report documented the federal government's efforts in these areas. The below summaries are taken from these annual reports.<sup>2</sup>

The **2024 TIP** report stated that DoD did not debar any individuals from conducting business with the federal government for violating contracting prohibitions related to human trafficking.

The **2023 TIP** report indicated that DHS did not debar any entities from conducting business with the federal government and referred 1 individual for prosecution for engaging in human trafficking; The Dept. of Defense (DoD) debarred 1 individual from conducting business with the federal government for violating contracting prohibitions related to human trafficking

The **2022 TIP Report** reported that the DoD investigated 31 cases related to forced labor in federal contracts. DoD took action against noncompliant employers and labor contractors resulting in 16 local corrective actions, one guilty plea in federal court, 12 actions with outcomes not reported, and two cases with no action taken by DoD. DHS did not debar any entities and did not convict any individuals of engaging in human trafficking from conducting business with the federal government.

The **2021 TIP Report documented that** DoD investigated 112 cases related to forced labor, compared to 13 cases in FY 2019. This resulted in one corrective action report, 50 local corrective actions, and 48 other actions (including assisting DoD commands to achieve resolution). In **2021** DHS debarred one entity and two individuals were

<sup>1</sup> The 2019 TIP Report stated that a contract was terminated after an investigation into forced labor. See <https://www.state.gov/wp-content/uploads/2019/06/2019Trafficking-in-Persons-Report.pdf>. 165031222.2 ; The 2023 TIP report stated that one individual was debarred from conducting business with the Federal government for violating

contracting prohibitions related to human trafficking. See <https://www.state.gov/reports/2023-trafficking-in-persons-report/united-states>

convicted of engaging in human trafficking from conducting business with the federal government.

The **2020 TIP Report** indicated that the DoD investigated 13 forced labor or related cases, compared to 23 cases in FY 2018. The DoD took action against noncompliant employers or labor contractors from U.S. programs resulting in six noncompliance requests. In addition, five cases remained pending, one was unsubstantiated, and one was resolved through corrective actions by the company.

The **2019 TIP Report** stated that the DoD took action against noncompliant employers or labor contractors from U.S. programs resulting in nine non-compliance requests, four cure notices, one show cause letter, one contractor personnel termination, six contractor employee debarments and one subcontractor debarment, and one contract termination

The **2018 TIP Report** reported that the DoD took action against noncompliant employers or labor contractors from U.S. programs resulting in 22 suspensions, six debarments, one job termination, and one compliance agreement.

## CONTACT INFORMATION

Stephanie Richard, Esq.  
Policy Director  
[stephanie.richard@lls.edu](mailto:stephanie.richard@lls.edu)  
(213) 375-8377

Aradhana Tiwari, Esq.  
Senior Policy Counsel  
[aradhana.tiwari@lls.edu](mailto:aradhana.tiwari@lls.edu)  
(213) 736-8377

## ABOUT SJI

Sunita Jain Anti-Trafficking Policy Initiative (SJI) is an evidence-based and survivor-informed think tank based out of Loyola Law School. SJI intentionally works towards systemic change by taking an intersectional approach to develop and advocate for policies which prevent human trafficking and support survivors of trafficking.

<sup>2</sup> The 2017-2024 TIP Reports are available at:  
<https://www.state.gov/trafficking-in-persons-report/>.

