

Why GAO Did This Study

U.S. laws prohibit federal contractors, subcontractors, grantees, and subgrantees from engaging in severe forms of human trafficking and trafficking-related activities.

Congress included a provision in statute for GAO to assess federal oversight of efforts to prevent trafficking for federally funded awards and to report violations. This report examines the extent to which DHS, DOD, State, and USAID (1) used a systematic approach to managing trafficking risks in contracting, and (2) communicated and met federal anti-trafficking requirements, as well as (3) how many referrals agency suspension and debarment officials received.

GAO reviewed a nongeneralizable sample of 12 contracts awarded in fiscal years 2022 and 2023 by the four agencies identified by OMB as having significant contract spending or heightened risk of trafficking. GAO reviewed the contract files for documentation related to federal and agency anti-trafficking requirements. GAO also reviewed relevant statutes, federal and agency regulations, guidance, and training, and interviewed OMB and agency officials.

What GAO Recommends

GAO is making nine recommendations, including that the four agencies should each take continued actions to manage trafficking risks in government procurements, and review contracting officials' compliance with federal anti-trafficking requirements in contracts. The four agencies concurred with the recommendations.

View [GAO-24-106973](#). For more information, contact Mona Sehgal at (202) 512-4841 or sehgalm@gao.gov, or Latesha Love-Grayer at (202) 512-4409 or lovegrayerl@gao.gov.

HUMAN TRAFFICKING

Agencies Need to Adopt a Systematic Approach to Manage Risks in Contracts

What GAO Found

Since 2000, Congress has increased requirements to prevent trafficking in federal contracting, but related trafficking allegations continue.

In response to a 2019 memorandum from the Office of Management and Budget (OMB), three of the four agencies in GAO's review—the Departments of Homeland Security (DHS), Defense (DOD), and State—have taken initial steps to identify trafficking risks in their contract spending. The U.S. Agency for International Development (USAID) did not conduct the analysis that OMB recommended. Further, none have taken a systematic approach to managing trafficking risks in contracting. This approach would include identifying and analyzing, developing responses to, and communicating the risks to contracting officials. Such an approach would better position agencies to support the U.S. policy of zero-tolerance for human trafficking.

Systematic Approach to Managing Trafficking Risks in Contracts



Source: GAO; Ainul/stock.adobe.com (illustration). | GAO-24-106973

All four agencies communicated federal anti-trafficking requirements to contracting officials through training and guidance. Most contracting officials GAO spoke with had completed the training and were aware of how they should report trafficking violations. However, compliance with requirements was inconsistent. Nine of the 12 contracts in GAO's review did not meet one or more of the anti-trafficking requirements, such as obtaining a required anti-trafficking certification from contractors.

Further, agencies require certain contractors to develop an anti-trafficking compliance plan, but contracting officials are not required to request the plans. GAO found that four of the six plans provided by contractors did not meet all federal requirements for what must be included in a compliance plan. Reviewing implementation of, and compliance with, federal anti-trafficking requirements in contracts would help to assure agencies that contracting officials and contractors are fulfilling their responsibilities to prevent trafficking in federal contracts.

Suspension and debarment offices at all four agencies said they received no referrals of Inspector General-investigated trafficking allegations against recipients of contracts, grants, and cooperative agreements for fiscal years 2022 and 2023. The DOD Inspector General reported conducting investigations into trafficking allegations during this time. Contractors also reported taking actions against subcontractors that violated their anti-trafficking policies.