

Senator Lindsey O. Graham
Questions for the Record
“Ensuring the Safety and Well-Being of Unaccompanied Children, Part II”
October 25, 2023

Questions for Cardell Morant, Director, Center for Combatting Human Trafficking, Homeland Security Investigations

1. What is the procedure followed by HSI when, during an initial encounter at the border, an unaccompanied alien child is identified as being trafficked?
 - a. How does HSI coordinate with CBP and HHS to place UAC into care while still conducting a criminal investigation?

Response: U.S. Immigration and Customs Enforcement Homeland Security Investigations (HSI) is generally not an agency of first contact at the border; first contact is typically by U.S. Customs and Border Protection (CBP). HSI does respond and initiate an investigation if it receives information through the processing of unaccompanied children (UAC) by CBP and it is determined there is evidence of human trafficking or another crime within the HSI purview. When encountering a potential human trafficking victim, HSI will immediately remove a UAC from any dangerous situation. HSI special agents are responsible for notifying the HSI Victim Assistance Program Specialist and Forensic Interview Specialist when a UAC has been identified as a victim in an HSI investigation for the coordination of victim assistance and, when appropriate, conduct a forensic interview. In the rare situations where HSI is the agency of first contact, HSI will facilitate notification to the U.S. Department of Health and Human Services (HHS) no later than 24 hours after HSI discovers that a UAC may be a victim of trafficking. If the UAC was already released by HHS to a sponsor, HSI notifies child protective services.

2. Are HSI, DOL, and HHS collaborating on civil and criminal investigations into the mistreatment of UAC?

Response: Yes. First, HSI participates on nearly 100 task forces comprised of federal, state, local, tribal, and territorial law enforcement along with victim service providers. Task forces can make case referrals to the appropriate civil or criminal agencies. For example, task force members, including HSI, can make a referral to the U.S. Department of Labor (DOL) Wage and Hour Division in the event they encounter workers that are not being paid or are being employed in violation of federal child labor laws. In turn, DOL can also refer matters to HSI when it identifies indicators of human trafficking in its investigations. HSI also collaborates on criminal matters with the DOL Office of Inspector General (OIG) and HHS OIG when appropriate. Second, the U.S. Department of Homeland Security’s (DHS) Center for Countering Human Trafficking (CCHT) is part of a federal interagency forced-labor initiative whose goal is to increase federal prosecutions. Under this initiative, the CCHT coordinates with the U.S. Department of Justice (DOJ) Human Trafficking Prosecution Unit, the Federal Bureau of Investigation (FBI), the Executive Office for United States Attorneys, DOL OIG, the DOL Wage and Hour Division, and HSI’s Labor Exploitation Unit. Lastly, HSI participates in an interagency task force on child labor exploitation led by DOL. The focus of the task force is on child labor exploitation; however, HSI participation ensures that human trafficking is considered and appropriate coordination can occur should trafficking be identified.

3. How does HSI utilize T visas and U visas in its counter human trafficking mission?

Response: U.S. Citizenship and Immigration Services (USCIS) has authority over the issuance of both T nonimmigrant status (T visas) and U nonimmigrant status (U visas). Law enforcement and other government certifying agencies, including HSI, have discretion over whether to sign supplemental law enforcement forms: a Form I-914, Supplement B, Declaration of Law Enforcement Officer for Victim of Trafficking in Persons for a T visa applicant, or a Form I-918, Supplement B, U Nonimmigrant Status Certification for a U visa petitioner. HSI considers signing these forms as part of a victim-centered approach when the victim applying for a T visa or U visa has assisted in an HSI investigation.

- a. How many T and U visas did HSI submit for UAC trafficking victims annually beginning in FY 2019?
- b. How many UAC trafficking victims are referred to HSI from DOL and HHS annually?

Response: HSI does not submit T or U visa applications/petitions, or issue T or U visas. USCIS has sole jurisdiction to approve applications for T-1 nonimmigrant status and petitions for U nonimmigrant status and such applications/petitions are submitted to USCIS by the victim directly. HSI does not track the number of Forms I-914, Supplement B, or Forms I-918, Supplement B, it signs for victims, nor does it track the number of investigations by referral source.

4. How many UAC trafficking victims were transferred back to ORR custody after being encountered by HSI during an investigation?

Response: If an HSI special agent identifies a UAC as a trafficking victim, HSI notifies the Enforcement Removal Operations Field Office Juvenile Coordinator (FOJC). While coordination with the FOJC occurs, the HSI special agent contacts an HSI Victim Assistance Program Specialist to address the immediate needs of the child. The FOJC makes the referral to HHS for the unaccompanied child to be placed with the Office of Refugee Resettlement (ORR) in accordance with the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA) and the Homeland Security Act of 2002 (HSA).

- a. How many of those UAC were encountered again by HSI as being involved in further trafficking?

Response: HSI has no recorded instances of a UAC being trafficked, returned to ORR custody, and then re-trafficked.

5. Has HSI identified any UAC where follow up communications with HHS had lapsed in any of its human trafficking investigations?

Response: HSI is not aware of any such instance.

6. Beginning in FY 2019, how many times has HSI annually encountered a situation in which a UC was trafficked either by their HHS vetted sponsor or by an adult resident of the sponsor's home during the course of trafficking investigations?

Response: HSI does not track the requested data.

Questions for the Record from Senator Charles Grassley
U.S. Senate Committee on the Judiciary
“Ensuring the Safety and Well-Being of Unaccompanied Children, Part II”
October 25, 2023

Questions for Director Cardell Morant:

- (1) The *New York Times* reported in February 2023, over the last two years, U.S. Department of Health and Human Services could not reach more than 85,000 children it placed with sponsors. How many of these 85,000 missing children has Homeland Security Investigations and its law enforcement partners been able to track down?
- (2) Do I have your and your office’s commitment that Homeland Security Investigations will investigate information and leads it receives regarding these missing children and will work to find these missing children?

Response: HSI respectfully defers to HHS to dispute the information reported by the New York Times. HSI will continue to work with our federal law enforcement partners in the Forced Labor Initiative, which places a heavy emphasis on forced child labor, to increase proactive investigations and prosecutions and to assist victims. Under this initiative, HSI coordinates with the DOJ Human Trafficking Prosecution Unit, the FBI, the Executive Office for United States Attorneys, the DOL OIG and Wage and Hour Division, and the HSI Labor Exploitation Unit.

- (1) In 2014, President Obama requested Congress close the loophole that treats children from contiguous countries differently from those from non-contiguous countries. Closing this loophole would allow unaccompanied children from all countries to be quickly returned home without having to find sponsors in the United States. It would also help stem the tide of migrant children from non-contiguous countries. Does the Biden administration and the Department of Homeland Security agree with President Obama that this loophole needs to be closed? If not, why not?

Response: The Department expresses no view on this legislative proposal. The Department regularly provides technical assistance to Congress on any legislative proposals that that would support the safe, orderly, and humane management of our borders.

SENATOR TED CRUZ

U.S. Senate Committee on the Judiciary

Questions for the Record for Cadell Morant, Acting Director for the Homeland Security Investigations Center for Countering Human Trafficking

I. Directions

Please provide a wholly contained answer to each question. A question's answer should not cross-reference answers provided in other questions. Because a previous nominee declined to provide any response to discrete subparts of previous questions, they are listed here separately, even when one continues or expands upon the topic in the immediately previous question or relies on facts or context previously provided.

If a question asks for a yes or no answer, please provide a yes or no answer first and then provide subsequent explanation. If the answer to a yes or no question is sometimes yes and sometimes no, please state such first and then describe the circumstances giving rise to each answer.

If a question asks for a choice between two options, please begin by stating which option applies, or both, or neither, followed by any subsequent explanation.

If you disagree with the premise of a question, please answer the question as-written and then articulate both the premise about which you disagree and the basis for that disagreement.

If you lack a basis for knowing the answer to a question, please first describe what efforts you have taken to ascertain an answer to the question and then provide your tentative answer as a consequence of its reasonable investigation. If even a tentative answer is impossible at this time, please state why such an answer is impossible and what efforts you, if confirmed, or the administration or the Department, intend to take to provide an answer in the future. Please further give an estimate as to when the Committee will receive that answer.

To the extent that an answer depends on an ambiguity in the question asked, please state the ambiguity you perceive in the question, and provide multiple answers which articulate each possible reasonable interpretation of the question in light of the ambiguity.

II. Questions

1. Has the Biden administration succeeded in safeguarding unaccompanied alien children that have been bought to America?

Response: The Biden Administration continues to manage our borders in a safe, secure, and humane way, leveraging expanded lawful pathways with enforcement consequences to keep migrants, including UACs, out of the hands of human traffickers. DHS works with its partners across the entire U.S. Government in close collaboration with HHS to safeguard UACs from human trafficking. The HSI-led CCHT is DHS's unified, cross-department coordination center for countering sex trafficking and forced labor, including the importation of goods produced with forced labor.

Typically, CBP is the first agency to encounter UACs at the border. DHS and HHS are involved in identifying UACs that are potential victims of human trafficking. In accordance with the TVPRA of 2008 and CBP policy, all UACs encountered by CBP are screened for indicators of human trafficking via CBP Form 93. This is an in-depth process that requires CBP Border Patrol Agents to visually screen all UACs and interview those capable of answering questions. Border Patrol Agents then make a determination, based on the visual indicators and interviews, regarding whether any UACs are potential victims of human trafficking. When Border Patrol Agents identify a UAC as a potential victim of human trafficking, the case is referred to HSI, the principal investigative arm of DHS.

Pursuant to the HSA and TVPRA of 2008,¹ DHS is responsible for transferring UACs into the care and custody of HHS ORR within 72 hours of UAC determination.² The UAC sponsor vetting process is conducted by ORR, and per the HSA, ORR is responsible for releasing UACs to a sponsoring adult. DHS defers to ORR and the HHS Office on Trafficking in Persons to provide additional information in response to your question.

As the investigative arm for DHS, HSI is responsible for investigating allegations of human trafficking. HSI Special Agents may be called upon during CBP processing, HHS sponsor placement proceedings, or after UAC relocation depending on the circumstances of when the suspected trafficking activity first occurs, is identified, and reported. In addition, HSI actively recruits local, state, and other federal agencies to participate in the HSI Task Force Officer (TFO) Program. HSI has a vast number of TFOs all throughout the country that aid in the identification and investigation of human trafficking activity.

In Fiscal Year 2023, HSI efforts to counter human trafficking resulted in the initiation of nearly 1,300 investigations and more than 2,600 arrests, 1,000 indictments, and 500 convictions. Once UACs are released to sponsors, HSI investigates a case if there is an allegation of human trafficking with a U.S. nexus and actively participates in task forces and interagency initiatives to ensure the safeguarding of UACs present in the United States.

¹ The HSA of 2002 transferred the authority to care for UACs who are in federal custody by reason of their immigration status to ORR. Consistent with the HSA, the TVPRA further specified responsibility for HHS with respect to the care and custody of UACs.

² In certain situations where the TVPRA permits a UAC from a contiguous country to voluntarily return to their country of origin, U.S. Border Patrol coordinates their return with a consular officer from that country.

2. In 2021, Teresa Ulloa Ziaurriz, the Director of the Latin American branch of the Coalition Against Trafficking International estimated that “sixty percent of Latin American children who set to cross the border alone or with smugglers have been caught by the cartels and are being abused in child pornography or for drug trafficking.” Do you have any reason to challenge Ms. Ziaurriz’s conclusion?

Response: The HSI Human Smuggling Unit cannot verify estimates for the percentage of migrants who are exploited by cartels. Smuggled migrants are often subjected to dangerous and exploitative conditions, such as being crowded into unventilated trucks/trailers, boats, or stash houses for long periods without food, water, or access to sanitation facilities. Smuggled migrants are also at risk of violence, extortion, and other forms of abuse by smugglers or criminal groups. HSI works to identify, disrupt, and dismantle the transnational criminal organizations that take advantage of vulnerable migrants, especially children.

3. During your tenure as Acting Director, how many investigations has HSI conducted in connection with forced alien child labor?
 - a. For involuntary servitude under 18 U.S.C. § 1584?

Response: Over the last three fiscal years HSI opened over 3,700 human trafficking investigations; however, the HSI system of record does not track forced noncitizen child labor as a standalone metric. The primary statutes under which HSI investigates forced child labor is 18 U.S.C. § 1589, Forced Labor, and 18 U.S.C. § 1584, Involuntary Servitude, which was heavily in use prior to the creation of the forced labor statute under the Trafficking Victims Protection Act.

4. It is obvious that the administration’s response to child labor exploitation is to go after the businesses who employ these children. However, why is it that we do not hear about any prosecutions against the criminals or gangs who are forcing these children into forced labor?

Response: HSI employs every available administrative, civil, and criminal enforcement authority to hold human traffickers accountable. Beyond human trafficking, HSI also conducts federal criminal investigations into drug trafficking, gang activity, and child sexual exploitation, among other federal crimes. In labor trafficking cases, agents investigate whether victims were made to work through force, fraud, or coercion for the purpose of subjecting them to involuntary servitude, peonage, debt bondage, or slavery, and often rely heavily on victim statements to fully identify those responsible. For example, a recent investigation involving a commercial laundry facility that engaged in labor trafficking, to include child forced labor, led to the conviction of four defendants and identification of nine victims, including two minors.³ Another recent investigation into a transnational criminal organization and agricultural business committing labor trafficking and visa fraud led to the seizure of more than \$8 million in assets, 20 indicted defendants, and the identification of 230 human trafficking victims.⁴

³ <https://www.ice.gov/news/releases/hsi-norfolk-investigation-results-indictments-4-connection-labor-trafficking-forced>

⁴ <https://www.justice.gov/usao-sdga/pr/human-smuggling-forced-labor-among-allegations-south-georgia-federal-indictment>

5. How many requests has HSI received from HHS to look into potential instances of trafficking (of all kinds—sexual, labor, or otherwise) involving children it placed with sponsors?

Response: Data is not collected by the HSI case management system to provide a response to the question on HHS referrals to HSI.

6. During your tenure, how many investigations did your agents present for federal prosecution involving unaccompanied alien children?
 - a. How many were successfully prosecuted?

Response: Over the last three fiscal years, HSI opened over 3,700 human trafficking investigations resulting in over 8,600 arrests and nearly 1,500 convictions. HSI's system of record does not track the number of cases involving UACs that were presented for federal prosecution.

Senator Hirono Questions for the Record for the October 25, 2023 Hearing in the Senate Judiciary Committee Hearing Entitled “Ensuring the Safety and Well-Being of Unaccompanied Children, Part II.”

QUESTIONS FOR DIRECTOR MORANT

Difficulty in Holding Traffickers Accountable

You state in your testimony that labor trafficking cases are especially difficult to detect, investigate, and prosecute. As a result, while 77% of human trafficking victims globally are victims of labor trafficking, HSI investigates fewer labor trafficking cases than sex trafficking.

QUESTIONS:

1. Please expand on the challenges you face in prosecuting labor trafficking cases and whether these challenges are unique to HSI investigations, unique to investigations brought by the federal government, unique to investigations brought in the United States and its territories, or are universal.

Response: The annual U.S. Department of State Trafficking in Persons Report⁵ includes country narratives detailing, among other things, the challenges law enforcement face with investigating and prosecuting labor trafficking. These challenges are not unique to HSI: may impact any investigation into labor trafficking, whether that is brought by a federal government law enforcement agency or other authority, and whether such investigation is brought inside or outside the U.S. The State Department report observes that:

- Labor trafficking is more difficult to detect because it is generally “hidden in plain sight” and can occur within legitimate workplaces with no signs of illegality. When one sees a laborer, one cannot see debt bondage, the individual’s low to nonexistent paycheck, or the threats they have endured. These are just a few of the invisible indicators of forced labor.
- The criminal justice system is far more experienced in dealing with sex trafficking than labor violations and exploitation, so it takes new and novel community partnerships to address labor trafficking.

2. What programs or procedures have you implemented to address the disparity between labor trafficking investigations and sex trafficking investigations?

Response: Because of the known challenges with labor trafficking, HSI and its federal interagency partners across the U.S. Government are proactively implementing several strategies to increase the number of successful forced labor investigations and prosecutions. The topic is addressed in both The National Action Plan to Combat Human Trafficking (December 2021);⁶ the DHS Strategy to Combat Human Trafficking, the Importation of Goods

⁵ <https://www.state.gov/reports/2023-trafficking-in-persons-report/>

⁶ <https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf>

Produced with Forced Labor, and Child Sexual Exploitation (January 2020),⁷ and the DHS Quadrennial Homeland Security Review (June 2023).⁸

Secretary Mayorkas announced forced labor training as a priority and, as a result, the DHS CCHT has been working diligently to produce a comprehensive series of training modules that aid investigators in identifying appropriate partnerships, what data to use to target local efforts, investigatory techniques and common evidence gathering, and how to use a victim-centered approach. The CCHT stood up a Forced Labor Unit this year and have experienced staff dedicated to supporting forced labor investigations with a separate unit that supports sex trafficking investigations. The Forced Labor Unit works collaboratively with the training section to produce quality instruction to HSI special agents. The CCHT is part of a federal interagency Forced Labor Initiative whose goal is to increase federal prosecutions. Under this initiative, the CCHT coordinates with DOJ's Human Trafficking Prosecution Unit, the FBI, the Executive Office for United States Attorneys, the DOL OIG, the DOL Wage and Hour Division, and the HSI Labor Exploitation Unit. HSI and HHS also participate in a DOL-led labor exploitation task force. The focus of the task force, as the name indicates, is on labor exploitation; however, HSI participation ensures that human trafficking is considered, and appropriate coordination can occur should any type of trafficking be identified.

What additional authorities or funding would most help HSI hold labor traffickers accountable?

Response: On February 9, 2023, DHS transmitted to Senate and House leadership an Office of Management and Budget cleared legislative proposal to Congress to amend the Continued Presence (CP) statute at 22 U.S.C. § 7105(c)(3). CP is a law enforcement tool used in a victim-centered investigation that enables certain individuals to remain in the country for a period of up to two years, with extensions available, to assist a human trafficking related investigation or federal civil action; however, it is underutilized by law enforcement nationwide. Some key updates to the statute would clarify who may apply and broaden the scope of outreach and awareness responsibilities among federal agencies. When noncitizen victims have CP, they are relieved of the fear of removal and have a source of economic support. This, in turn, makes them more comfortable and able to assist law enforcement with an investigation, and would therefore assist all law enforcement who are investigating any form of trafficking, including labor trafficking.

Additionally, listed below are the immediate funding needs:

- CCHT Authorized Funding: The Countering Human Trafficking Act of 2021, Pub. L. No. 117-322 (Dec. 27, 2022) authorized \$14 million to carry out the Act to remain available until expended. This money has yet to be appropriated to the CCHT and is critical to be able to carry out the provisions of the Act.
 - CCHT Facility Expansion: \$5 million of this funding would be used to build out a space sufficient for the coordination of efforts to counter human trafficking and forced labor, including tenant improvement efforts, furniture, and necessary technology upgrades. Fiscal Year (FY) 2022 and FY 2023 appropriations provided funding to significantly increase CCHT staff, but no funding was allocated to increase facility space. The current CCHT facility has exceeded capacity and does

⁷ https://www.dhs.gov/sites/default/files/publications/20_0115_ply_human-trafficking-forced-labor-child-exploit-strategy.pdf

⁸ <https://www.dhs.gov/publication/2023-quadrennial-homeland-security-review-qhsr>

not factor in FY 2022 and FY 2023 enhancement positions, the pending increase in DHS liaison personnel, or CCHT mission requirements to host partner and stakeholder engagements. The current space is sufficient only to house the HSI personnel, contractors, and a limited number of DHS partners that were initially assigned to the CCHT in 2020, along with their related files, supplies, and equipment. Since the founding of the CCHT, the number of permanent employees assigned to the CCHT has increased from 23 to 80, representing an increase of nearly 250 percent. Notably, this only includes permanent personnel and does not include the CCHT's DHS Component detailees/liasons or contract support personnel which is also projected to increase under the current enhancement plan. The total seating requirement and planning factor for a fully staffed and resourced CCHT is 100. No previous funding has been appropriated to perform the necessary facility expansion needed to accommodate the substantial increase in personnel.

- Other Initiatives Required by the Act: The CCHT would also use this funding to enhance its training efforts by conducting a DHS-wide analysis to identify gaps in human trafficking-related training and propose ways to address those gaps; updating the learning management system-based trainings offered across DHS that train employees to recognize and report human trafficking; and to execute a monthly virtual speaker/presentation series, an annual DHS Seminar during Human Trafficking Prevention Month, and in-person HSI Advanced Investigations Training. Moreover, in collaboration with the DHS Science and Technology Directorate, the CCHT aims to modify systems throughout DHS to accelerate lead development, advance the identification of human trafficking characteristics and trends, apply analytics to automate manual processes, and provide artificial intelligence to enhance data availability, reliability, comparability, and verifiability. The funding would support this modernization initiative and provide contract support and technology experts to conduct DHS-wide needs assessments and automate systems and processes.
- DHS Blue Campaign: The DHS Blue Campaign (BC), a national public awareness campaign to educate the public on indicators of human trafficking, was transferred to the CCHT pursuant to the Countering Human Trafficking Act of 2021, which was signed into law on December 28, 2022. Historically, Congress directed DHS to sustain the BC at no less than its total FY 2021 levels of \$5.6 million, to include Component contributions of no less than \$3.0 million. Over the years, DHS Component contribution amounts have varied. The BC received approximately \$5.0 million in contributions on average from FY 2019 through FY 2021 and over \$11.0 million in contributions in FY 2022. With the transfer of BC to the CCHT, HSI does not have the authority to collect DHS Component contributions, leaving a significant annual budget deficit for the program of at least \$3.1 million as only \$2.5 million will come to the CCHT annually for the program.
- Uyghur Forced Labor Prevention Act Support: The Uyghur Forced Labor Prevention Act (UFLPA), Pub. L. No. 117-78 (December 23, 2021) presumes all goods mined, produced, or manufactured wholly, or in part, in the Xinjiang Autonomous Region (XUAR) to be produced by forced labor. Due to the UFLPA, CBP anticipates a substantial increase of inspections of over 11.5 million shipments at points of entry (POEs) and subsequent transactions. HSI is the primary investigative agency responsible for responding to and investigating crimes occurring at POEs. \$5.6 million in additional funding would enable HSI to establish a dedicated UFLPA investigative team focused on crimes of forced labor

emanating from the XUAR, to include the hiring of 10 additional special agents to be assigned to the CCHT, eight HSI special agents to be assigned to HSI Global Trade Investigations, and two HSI special agents to be assigned overseas.

3. What are some of the challenges HSI faces with immigrant communities that may be fearful of DHS or ICE?

Response: HSI special agents recognize the fear that any human trafficking victim, citizen or noncitizen, may face when reaching out to law enforcement. Traffickers often manipulate victims and instill fears of law enforcement or immigration enforcement. That is one of the reasons HSI continues to implement a victim-centered approach.

How has HSI tried to mitigate or address those challenges to ensure that victims of trafficking receive justice regardless of immigration status?

Response: As listed below, HSI does several different things to help overcome or at least mitigate fears:

- HSI conducts extensive local community outreach to places where victims may turn to for help—such as organizations that advocate for workers’ rights, assist crime victims and/or children, or are faith-based. Through strong partnerships with non-governmental organizations (NGOs), HSI builds trusted relationships that make victims feel more comfortable working with us.
- Using a victim-centered, trauma-informed, and culturally sensitive approach, and treating victims with dignity and respect, HSI Victim Assistance Program (VAP) personnel provide services and rights to victims and conduct forensic interviews of victims and witnesses in support of HSI criminal investigations. Fundamental to the VAP mission is assisting victims and restoring their well-being, both of which contribute to a victim’s ability to become an effective witness and participate in the criminal justice process. HSI’s obligations extend to U.S. citizens and noncitizens who are identified as crime victims in HSI investigations.
- HSI requests CP as appropriate on behalf of victims assisting HSI investigations. With this law enforcement tool, a victim is protected from removal for two years with extensions available. They can also lawfully work and receive social services. It is a great example of using a victim-centered approach.

HSI also signs T visa law enforcement declarations (Form I-914, Supplement B) and U visa law enforcement certifications (Form I-918, Supplement B), as appropriate, if the individual is indeed a victim of a severe form of trafficking in persons or trafficking and other related crimes more generally and has assisted in an HSI investigation. The information on these supplemental forms provides USCIS with additional helpful information regarding the steps that law enforcement has taken and to what extent the victim provided assistance. The victim is then responsible for sending the supplemental law enforcement form to USCIS along with their T visa or U visa application, and USCIS determines their eligibility for T or U nonimmigrant status. When HSI reliably uses CP and signs T visa law enforcement declarations and U visa law enforcement certifications, HSI Special Agents become trusted partners to the NGOs working with noncitizen trafficking victims. NGOs can then pass along their assurances to victims that HSI will use a victim-centered approach to support them.