



Office of Temporary and Disability Assistance

KATHY HOCHUL
Governor

BARBARA C. GUINN
Commissioner

RAJNI CHAWLA
Executive Deputy Commissioner

September 12, 2025

By email to: nmorrell@osc.ny.gov

Nadine Morrell
Audit Director
Office of the State Comptroller
110 State Street
Albany, NY 12236

Re: Controls Over the Response to Human Trafficking
Program (RHTP), 2023-S-031

Dear Nadine Morrell:

The New York State Office of Temporary and Disability Assistance (OTDA) submits this 180-day response to the Office of the State Comptroller's (OSC) final report regarding the audit on the Response to Human Trafficking (Report 2023-S-31) issued on March 17, 2025. The purpose of this letter is to provide an update on OTDA's implementation of the recommendations made by the OSC. Pursuant to Section 170 of the Executive Law, copies of this response will be sent separately to the Governor, the State Comptroller, and leaders of the Legislature as well as fiscal committees.

In response to the specific recommendations in OSC's report, OTDA responds as outlined below.

OTDA's responses to OSC Areas of Recommendations

1. Improve data collection and monitoring efforts to evaluate program outcomes and successes, including obtaining data through the local districts and providers.

OTDA implemented an annual report from Response to Human Trafficking Program (RHTP) providers in 2022 that indicates how many confirmed individuals received services and what types of services were provided. The RHTP annual reports are comprehensive and include data on identified trends, what issues RHTP providers encounter, and their recommendations to address the issues encountered. OTDA also conducts site visits to each provider, reviews records, and provides an individualized report. In addition, quarterly voucher reporting includes data on staffing, client-related expenditures, and other budgeted items.

OTDA also receives individual reports from the district Human Trafficking Liaisons (HTLs) on referred individuals, including which benefits were applied for and the results of the application, along with information regarding referrals and engagement with advocates, law enforcement or government offices. Updates to the HTL database were made including the report programming.

Finally, OTDA has maintained a Confirmation Database since 2007 of referrals, outcomes, and comprehensive data regarding referral source, type of trafficking, gender, age, and region. This database was expanded in 2024 to include: housing status, labor trafficking industry, sex trafficking location, trafficker relationship, and trafficker gender.

2. Develop and implement policies and procedures regarding the documentation that should be retained to support pauses in the confirmation time frame.

Confirmation by statute is a joint process between OTDA and the New York State Division of Criminal Justice Services (DCJS). DCJS initiates contact with each referral source upon receipt of referral. DCJS maintains contact with the referral source throughout the confirmation process until a determination is made and, as appropriate, shares any case-specific information with OTDA. DCJS tracks the status of referrals and maintains a record and copies of correspondence with all referral sources. Additionally, DCJS notifies OTDA of cases with repeated, unsuccessful attempts to contact the referral source or to obtain additional information. OTDA tracks the referral date and outcome dates in the confirmation OTDA's database.

Feedback from providers found in the RHTP annual reports has largely been extremely positive, that the process is expeditious, and that they are appreciative of the speed with which confirmations are issued.

3. Enhance guidance, including documentation such as standardized forms, and communicate more frequently with Providers to ensure Program goals are met.

OTDA holds an annual meeting each June to review the contract requirements, any software updates (such as to the Statewide Financial System), and address provider questions. OTDA holds quarterly trainings with RHTP providers since 2023 and topics have included: access to public benefits and the role of HTL's, housing development for survivors, staff retention model policies, labor trafficking, and information sharing among providers. OTDA also met with RHTP providers in January to solicit feedback on the program.

In addition, OTDA has held several rounds of individual calls with each RHTP provider as issues have arisen, such as the development of the annual report and the passage of the Debt Bondage Reduction Act. OTDA has conducted site visits to all RHTP providers during the current contract cycle. OTDA also is in regular correspondence with providers, providing technical assistance on individual cases, guidance on policy and best practices, and grant and vouchering instructions. OTDA has provided mechanisms and supports to providers to build relationships with each other, in an effort to build a strong network. RHTP providers frequently provide positive feedback to program on communications and guidance.

Sample forms remain available and have been shared. Providers incorporate the content of the sample forms agency documents to streamline forms and avoid duplication of information/effort.

4. Ensure the duties and responsibilities prescribed by the Memo are effectively communicated to liaisons so they understand their role in the program.

When a new HTL is assigned in a district, OTDA provides a standardized onboarding letter which includes the relevant administrative guidance directives and an overview of the duties and timelines. The letter includes the link to the comprehensive online video training. This guidance is also provided annually to all HTL's each Fall.

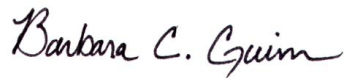
In addition, OTDA updated the HTL database and provided guidance documents on the updates in 2022. OTDA held a meeting with Liaisons in November 2024 on the administrative directive. OTDA also presented at the NY Public Welfare Association conference to HTLs on January 29, 2025. OTDA regularly receives requests for technical assistance from HTLs and provides guidance on such issues as access to public benefits, the confirmation process, and service provider referrals.

5. Develop and implement a formal process to maintain a current list of liaisons.

OTDA has had a process to maintain the list of HTL's since the onset of the program in 2007. This process has been formalized on letterhead.

If you have questions or comments about our 180-day response to the audit, please contact Thomas Cooper, Deputy Commissioner of Audit and Quality Improvement, at (518) 473-6035.

Sincerely,

A handwritten signature in black ink that reads "Barbara C. Guinn". The signature is written in a cursive, flowing style.

Barbara C. Guinn
Commissioner

cc: Rajni Chawla
Richard Umholtz