

Inspector General

United States
Department of Defense



Inspections and Evaluations

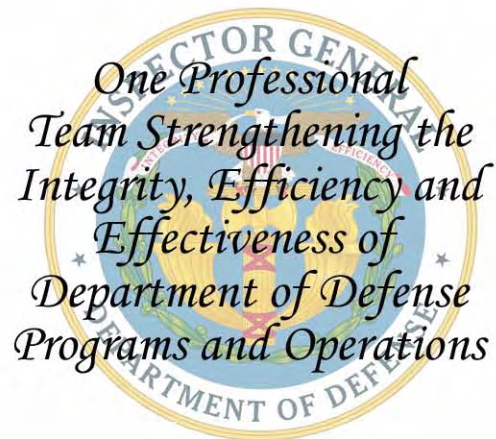
Evaluation of DoD Efforts to Combat Trafficking in Persons

November 21, 2006

Report No. IE-2007-002

DEPARTMENT OF DEFENSE
OFFICE OF INSPECTOR GENERAL

VISION STATEMENT



Evaluation of the DoD Efforts to Combat Trafficking in Persons

November 2006



VISION

A professional team of outcome-oriented inspectors promoting positive change by identifying opportunities for performance and efficiency improvements in Department programs and operations.

MISSION

The Directorate of Inspections and Evaluations conducts objective and independent customer-focused management and program inspections addressing areas of interest to Congress and the Department of Defense, and provides timely findings and recommendations leading to positive changes in programs.

Who Should Read This Report and Why?

All commanders and leaders of Department of Defense (DoD) organizations responsible for implementing programs that combat trafficking in persons (TIP) should read this report. The report discusses DoD actions taken and provides suggestions on how to improve DoD programs that can combat TIP.

What We Did

We focused specifically on the Office of the Secretary of Defense (OSD), the Military Services, selected Combatant Commands, and a power projection platform/mobilization station.

The objectives of the evaluation were to:

- Determine if DoD directives, implementing instructions, organization, metrics, and resources are adequate for the DoD Components to develop implementing programs with actionable objectives.
- Determine if TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among DoD civilian employees/contractor personnel/Service Members.
- Determine if laws and international agreements are sufficient to give commanders the requisite authority “outside the gate.”

Our methodologies included reviews of policies and guidance, sensing sessions, Web-based surveys, interviews with program officials, and installation visits.

What Was Identified?

DoD continues to develop a Department-wide program for combating TIP. The program has yet to mature. More than 79 percent of survey respondents received TIP awareness training and more than 86 percent of those trained understood the training. While initial training was conducted at 85 percent of the locations visited, only 35 percent of the locations maintained an ongoing TIP awareness program. A DoD directive/implementing instruction is needed to institutionalize and standardize the Department’s TIP policies and procedures, the responsibilities of Combatant Commands and Military Services, and the role of military law enforcement organizations. Commanders did not see their “authority outside the gate” as a significant barrier to the implementation of an effective TIP program.

DoD has taken, or is taking, the following actions to combat TIP:

- Completed a general awareness TIP training module. (Leadership and law enforcement modules remain under development.)
- Established an OSD TIP coordinating council to integrate functional responsibilities.
- Added a charge of patronizing a prostitute to the Manual for Courts Martial.
- Participated in U.S. interagency senior level TIP coordination.
- Collaborated on an initiative to develop an interim Defense Federal Acquisition Regulation Supplement clause that will require anti-TIP provisions on all DoD contracts.

How to Improve the DoD Program to Combat TIP

We made 14 major recommendations in the areas of coordination, training, policy, and metrics.

GENERAL INFORMATION

Forward questions or comments concerning the Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP) and other Inspections and Evaluations activities to:

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20310-1900

REPORT TRANSMITTAL

We are providing this report for information and use. We considered management comments to our findings in preparing this final report. All comments conformed to the requirements of DoD directive 7650.3, "Follow-up on General Accounting Office (GAO), DoD Inspector General (DoD IG), and Internal Audit Reports," June 3, 2004. Therefore, except for the Air Force comments that are pending, additional comments are not required. The complete text of the comments is in the Management Comments section of the report. The DoD IG Audit Follow-up/GAO Affairs Directorate will manage follow-up actions on implementing the report's recommendations.



Wm Brent Morrison, III
Assistant Inspector General
for Inspections and Evaluations

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Executive Summary

Evaluation of Department of Defense (DoD) Efforts to Combat Trafficking in Persons (TIP)

Trafficking in Persons (TIP) Defined. The recruitment, transportation, transfer, harboring or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or giving or receiving payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal of organs.*

Overall Assessment

DoD has made significant progress in implementing a comprehensive program for combating TIP. DoD has fielded training for all deploying Service Members, civilians, and DoD contractors. Significant work remains to institutionalize an ongoing and mature anti-TIP program. Commanders do not see their “authority outside the gate” as a significant barrier to the implementation of an effective TIP program.

Background and Overview

National Security Presidential Directive-22 (NSPD-22). Issued in December 2002, this Directive instructs that Federal agencies strengthen their collective efforts, capabilities, and coordination to support the policy to combat trafficking in persons (Appendix C).

Congressional Request. On November 18, 2005, the Department of Defense Inspector General (DoD IG) announced this evaluation to determine if DoD was implementing actions to combat trafficking in persons. This evaluation is one of several DoD IG initiatives in response to a 2003 congressional letter signed by two members of Congress (Appendix B). The letter expressed concerns about alleged U.S. military personnel and contractor involvement in sex trafficking.

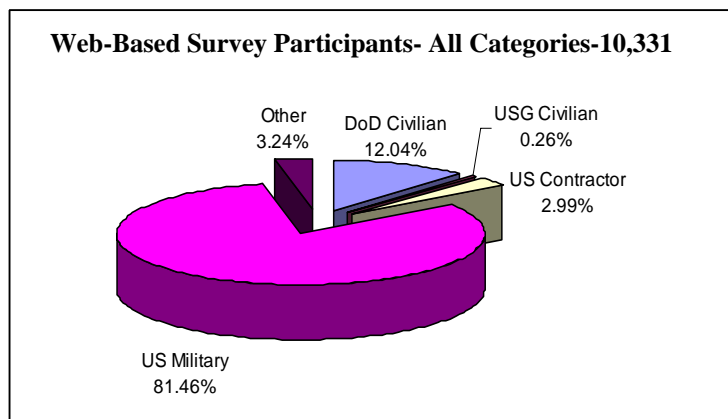
Secretary of Defense/Deputy Secretary of Defense. Both the Secretary of Defense (SecDef) and Deputy Secretary of Defense (DepSecDef) published policy letters on this subject (Appendix D). These documents established the Department’s “zero tolerance” TIP policy and directed the involvement of DoD Inspectors General in this issue.

Evaluation Scope. To address congressional interest and to comply with SecDef and DepSecDef guidance, this report examines DoD policies and procedures to combat trafficking in persons (TIP). The DoD IG evaluation team interviewed officials at the Offices of the Secretary of Defense (OSD), Joint Staff, Army, Air Force, Navy, and Marine Corps, and representatives of selected Combatant Commands. (See Appendix A for methodology.)

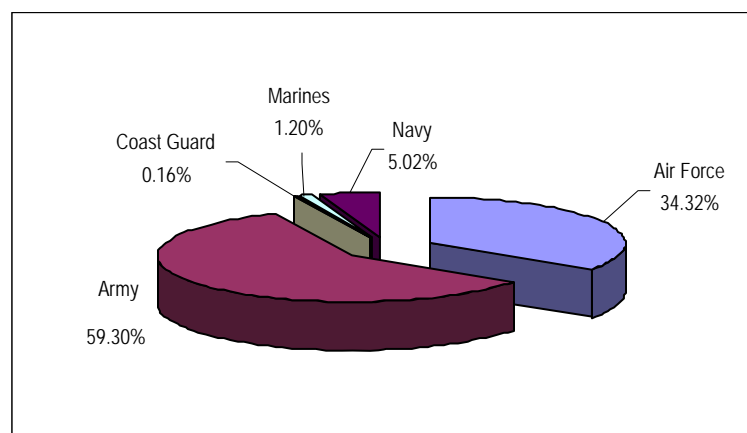
Results

DoD fielded a general awareness training module, but is still developing leadership and law enforcement training modules to complete the TIP training package. A DoD instruction for the TIP program has been drafted.

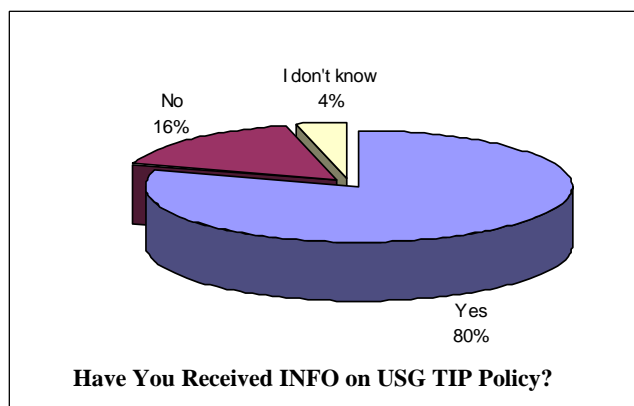
The DoD IG developed a Web-based TIP survey to help gauge TIP awareness throughout DoD and to solicit ideas for improving the DoD TIP program. The Web-based survey results are a snapshot of TIP awareness among respondents and are not intended to predict future outcomes. (See Appendix A—Methodology, Appendix G—Web-Based Survey Questionnaire, and Appendix H—Web-Based Survey Results.) A total of 10,331 personnel took the Web-based survey.



The military (active and reserve) made up the majority of the personnel who took the Web-based survey. The chart to the right shows breakout by Military Service. The majority of the participants were Army with 4,895 participants, followed by the Air Force with 2,975 participants. The Navy, Marines, and Coast Guard had 431, 100, and 10, respectively.

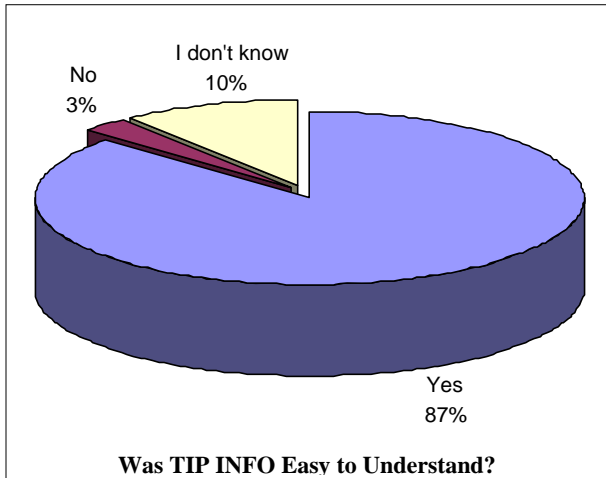


A key question on the Web-based survey was: “Have you received information on the U.S. Government policy regarding Trafficking in Persons?” The chart below shows responses to that question.



Eighty percent of the Web-based survey participants stated that they were aware of the U.S. policy regarding TIP.

The question was also asked during the small group sensing sessions. Approximately 80 percent of the participants stated that they had received information on TIP.



Another key question asked: “Was the information easy to understand?” About 87 percent of the survey participants who answered “yes” to having received information on the Government TIP policy stated that they easily understood the information. Sensing session participants commented that the training should include a military scenario on how criminal organizations use commercial sex services to fund terrorist organizations. At least 50 percent of the sensing session participants (excluding United States Forces Korea [USFK] members) stated that they did not understand how the military was involved in TIP.

Conclusions

DoD has made significant progress to implement a comprehensive program for combating TIP. Training for all deploying Service Members, civilians, and DoD contractors has been fielded. Significant work remains to ensure an ongoing and mature anti-TIP program is fielded and institutionalized. Commanders do not see their “authority outside the gate” as a significant barrier to the implementation of an effective TIP program.

DoD Policy and Instructions. DoD has yet to publish a directive or the DoD TIP program implementing instructions. Hence, program organization, metrics, and resources are ad hoc and not institutionalized. For example, because no dedicated funds are allotted to combat TIP, DoD Components use their operating budgets to develop and implement TIP programs and actionable objectives. The DoD Directive or implementing instructions should be published as soon as possible.

TIP Program Awareness. The USFK TIP program, implemented in 2002, effectively promoted awareness of applicable laws and restrictions regarding TIP. Based on discussions during the sensing sessions and command interviews, the evaluation team found that the USFK TIP program was effective in fostering behavioral changes among DoD civilian employees, contractor personnel, and Service Members. The TIP programs in other DoD components, to include the Military Services, are less advanced than the USFK program. Some DoD personnel expressed confusion concerning the SecDef and DepSecDef TIP policy memoranda. In all instances, additional awareness actions are underway.

Commanders’ Authority “Outside the Gate.” During our visits overseas (see Appendix A), all Combatant Command (COCOM) and Military Service command officials stated that adequacy of local laws and international Status of Forces Agreements (SOFA) depend on host nation support and involvement. Commanders can place establishments off limits, but do not possess the authority to halt or challenge illegal or undesirable activity “outside the gate” without local law enforcement conformity and action on the matter. Nevertheless, none of the Military Service commanders or staff favored revising the SOFA solely to address TIP issues. Commanders did not perceive a lack of “authority outside the gate” as a significant barrier to the

implementation of an effective TIP program.

Recommendations

To improve the Department of Defense's efforts to combat trafficking in persons, we recommend DoD:

1. Complete and publish a DoD Directive and/or implementing instruction for the TIP program that assigns clear roles and responsibilities. (Office of Primary Responsibility [OPR]: USD[P&R]; Office of Collateral Responsibility [OCR]: COCOMs, Military Services)
2. Establish and document a requirement for a periodic OSD TIP Coordinating Council meeting to review issues and to integrate DoD TIP program improvements. USD(P&R) should consider including the Services' TIP POCs. (OPR: USD[P&R])
3. Include TIP training in the Joint and Service institutional training curricula, at all levels, for both officers and enlisted Service Members. (OPR: USD[P&R]; OCR: Director, Joint Staff; Military Services)
4. Include TIP-related considerations when developing plans for establishing new overseas bases, for example, anti-TIP language in DoD contracts and pre-deployment TIP training requirements for Service Members, DoD civilian employees, and contractors. (OPR: USD[P&R]; OCR: Geographic COCOMs, Military Services)
5. Develop TIP training modules that are based on realistic, military-related TIP scenarios. (OPR: USD[P&R]; OCR: Military Services)
6. Establish TIP-related training at all Power Projection Platforms and Mobilization Stations and other similar pre-deployment training venues. (OPR: Military Services)
7. Include TIP training and planning as a part of the U.S. Army's Peacekeeping and Stability Operations Institute's mission. (OPR: USD[P&R]; OCR: Army)
8. Develop TIP policy and program guidance unique to each COCOM and Military Service. Update after publication of the DoD directive and/or implementing instructions. (OPR: COCOMs, Military Services)
9. Establish a metric for tracking TIP awareness training and understanding of TIP-related policy and programs. The metric should track the total number of DoD personnel assigned and total number trained, broken out by military, DoD civilians, and DoD contractors. (OPR: USD[P&R]; OCR: Military Services)



Evaluator, Mr. Thomas McKenna briefing Marines prior to a sensing session

10. Establish an OPR for each Service and designate a TIP program officer at each overseas military installation. (OPR: Military Services)

11. Establish a memorandum of understanding with local law enforcement and nongovernmental organizations who work with victims of trafficking in persons and prostitution at or near overseas military installations. (OPR: Military Services)

12. Finalize and issue installation-level TIP policy memoranda in accordance with OSD policy memoranda. Update after publication of DoD directive/implementing instructions. (OPR: Military Services)

13. Conduct command evaluations of the effectiveness of TIP awareness training. (This evaluation should periodically involve the IG, per the DepSecDef policy letter on this subject [Appendix D].) (OPR: Military Services)

14. Multi-National Force-Iraq (MNF-I) and Coalition Forces Land Component Command (CFLCC) conduct a follow-up review to ensure DoD contractors' compliance with U.S. law and command policy regarding trafficking in persons. (OPR: MNF-I; OCR: CFLCC)

Additional recommendations for specific Combatant Commands are in the appropriate chapter of the report.

Management Comments and OIG Response

The Under Secretary of Defense for Personnel and Readiness (USD[P&R]) “concurred with comment.” The comments addressed actions taken or planned to implement specific recommendations in the report that listed USD(P&R) as the OPR. The complete USD(P&R) response is at Appendix J.

The Director, Joint Staff “concurred without comment” regarding the specific recommendation related to the Joint Staff (Executive Summary [EXSUM] recommendation 3). The Director also provided a matrix summary of responses from the various COCOMs (addressed separately). The complete response from the Director is at Appendix J.

The Army Assistant Secretary for Manpower and Reserve Affairs “concurred with comment” regarding the specific recommendations related to the Army or Military Services. The Army recommended that the metric referenced in EXSUM recommendation 9 include a measure of the effectiveness of the TIP program. They also recommended that the DoD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing memoranda of understanding (EXSUM recommendation 11). The complete Army response is at Appendix K.

OIG Response: We passed the Army recommendations on to the Director, Law Enforcement Policy and Support in USD(P&R) for possible inclusion in the new DoD TIP directive that is

currently out for formal staff comment.

The Navy Assistant Secretary for Manpower and Reserve Affairs and The Deputy Naval Inspector General for Marine Corps Matters/Inspector General of the Marine Corps “concurred” and assigned an OPR to the specific recommendations related to the Military Services. The complete Navy and Marine Corps response is at Appendix K.

The Air Force did not respond to our request for Management Comments. We will ask them to respond to the final report within 90 days of publication.

The U.S. Pacific Command (PACOM) “reviewed the report” and only had “two minor comments,” editorial in nature, which we included in the report. Based on this response, we concluded that they “concurred” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or PACOM. The complete PACOM response is at Appendix L.

United States Forces Japan (USFJ) initially “nonconcurred” with the recommendations for USFJ on page 25 of Chapter 3, based on their view that Service Member training was a Service Component responsibility. They also provided some editorial comments on that section of the report that would improve the accuracy. The complete USFJ response is at Appendix L.

OIG Response: We incorporated their editorial comments, reworded recommendation 1 on page 26 of Chapter 3 and eliminated the original recommendation 3, replacing it with a new recommendation that was based on USFJ comments. USFJ reviewed these changes and “concurred” with the report and the USFJ recommendations.

United States Forces Korea (USFK) “concurred” with the report and the recommendation for USFK in Chapter 3, page 30. The complete USFK response is at Appendix L.

The U.S. European Command (EUCOM) “concurred with comment” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or EUCOM. They stressed that training individual Service Members was a Service Responsibility vice a COCOM responsibility, which we noted in Chapter 4 under the paragraph on “TIP Training Responsibility.” The complete EUCOM response is at Appendix L.

OIG Response: Based on EUCOM comments, we made changes to Chapter 4 in the paragraphs on “Senior Leader Involvement,” Commander’s Reactions,” and “NGO Corruption in Bosnia.” We also reworded the EUCOM recommendation 5 in Chapter 4 to reflect the Service Component responsibility to put establishments off limits if they are a front for prostitution.

The U.S. Central Command (CENTCOM) “concurred with no critical comments.” They addressed actions taken or planned to implement specific recommendations in the report related to Geographic COCOMs, COCOMs, or CENTCOM. The complete CENTCOM response is at Appendix L.

The U.S. Northern Command (NORTHCOM) “concurred” with the report and specific recommendations in the report related to Geographic COCOMs, COCOMs, or NORTHCOM.

Their complete response is at Appendix L.

The U.S. Southern Command (SOUTHCOM) “concurred with comment” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or SOUTHCOM. They recommended rephrasing Executive Summary recommendation 8—“Develop TIP policy and program guidance unique to each COCOM and Military Service. Update after publication of the DoD directive and/or implementing instructions”—to read “Develop TIP policy and program guidance unique to each COCOM and Military Service after publication of the DoD directive and/or implementing instructions.” The complete SOUTHCOM response is at Appendix L.

OIG Response: Current policy letters from the Secretary of Defense, the Deputy Secretary of Defense, and USD(P&R) (Appendix D) are sufficient to develop basic COCOM TIP policy and program guidance.

The U.S. Special Operations Command (SOCOM) “concurred” with the report and specific recommendations in the report related to COCOMs or SOCOM. The complete SOCOM response is at Appendix L.

The U.S. Transportation Command (TRANSCOM) “concurred” with the report and specific recommendations in the report related to COCOMs. The complete TRANSCOM response is at Appendix L.

The U.S. Strategic Command (STRATCOM) “concurred” with the report and specific recommendations in the report related to COCOMs. Their response noted actions taken or proposed to implement the report’s recommendations. The complete STRATCOM response is at Appendix L.

The U.S. Joint Forces Command (JFCOM) “concurred” with the report and specific recommendations in the report related to COCOMs. The complete JFCOM response is at Appendix L.

Multi-National Force-Iraq (MNF-I) and Coalition Forces Land Component Command (CFLCC) “concurred” with report and specific recommendation in the report related to MNF-I and CFLCC. Their response was included in the CENTCOM response and is at Appendix L.

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Background and Overview

Trafficking In Persons Defined. The recruitment, transportation, transfer, harboring or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability; or giving or receiving payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal of organs.¹

Historical Perspective. In March 2002, a reporter from the Fox television affiliate in Cleveland, Ohio, aired a report that women trafficked from the Philippines, Russia, and Eastern Europe were forced into prostitution in bars servicing the U.S. military in South Korea.

In May 2002, 13 members of Congress requested a “thorough, global, and extensive” investigation into the publicized allegation that U. S. military leadership in Korea was implicitly condoning sex slavery. (See Appendix B—Congressional Letters.)

In December 2002, a National Security Presidential Directive (NSPD-22) instructed that Federal agencies strengthen their collective efforts, capabilities, and coordination to support the policy to combat trafficking in persons. (See Appendix C—NSPD-22.)

In 2003, the Department of Defense Inspector General (DoD IG) initiated a Human Trafficking Assessment Project in South Korea and released the report on the “Assessment of DoD Efforts to Combat Trafficking in Persons, Phase I—United States Forces Korea,” in July 2003. (See www.dodig.mil/fo/Foia/H03L88433128PhaseI.PDF.)

A second phase of this assessment focused on the European theater, specifically Bosnia-Herzegovina and Kosovo, resulting in a December 2003 report on the “Assessment of DoD Efforts to Combat Trafficking in Persons, Phase II—Bosnia-Herzegovina and Kosovo.” (See www.dodig.mil/fo/Foia/HT-Phase_II.pdf.)

The results of the assessment project indicated that awareness training, along with leader focus, were viable tools needed to combat human trafficking. (See Appendix A- Methodology, Prior Coverage.)

On September 25, 2003, two members of Congress requested a DoD IG “follow-up on investigations [Korea and the Balkans] by sampling and visiting, as appropriate, other bases in South Korea and around the world about what steps have been taken to address human sex trafficking.” (See Appendix B.) The letter expresses concerns about alleged U.S. military personnel and contractor involvement in sex trafficking.

On July 1, 2004, *The Washington Post* published an allegation that a DoD contractor, Kellogg, Brown, and Root (KBR), was engaged in debt bondage practices involving Indian nationals. The Department of State (DOS) asked OSD to look into the validity of a statement from the article:

¹ United Nations’ definition of trafficking in Persons:
www.unodc.org/unodc/en/trafficking_human_beings.html

“A spokeswoman for the Army, which manages the KBR contract, said the responsibility for the investigation rests with the company.” It was determined that an Army Public Affairs officer made the statement. OSD requested that DoD IG look into these labor-related issues. Chapter 7 of this report discusses the actions taken on this allegation and other labor issues within Iraq.

DoD Population. Persons affiliated with DoD have a relatively high probability of exposure to trafficked persons or TIP related activities. As of February 2006, the DoD, the nation’s largest employer, had a total force of 3.3 million, with 1.4 million men and women on active duty, 654,000 Government civilians, and 1.2 million volunteers serving in the Guard and Reserve.² An additional 2.0 million retirees and families receive DoD benefits. Many of these personnel are deployed at locations around the globe, often in locations known for TIP-related activities.

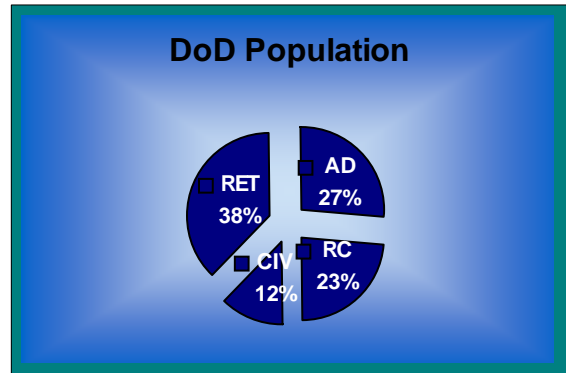


Figure 1. Percentage break out of the Active duty (AD), Reserve components (RC), civilians and retirees.

DoD Contractors. DoD contractors and subcontractors also have a high probability of exposure to TIP-related activity. DoD has contracted out many of its support requirements for goods and services. As of fiscal year 2005 (FY 2005), 92,416 companies have DoD contracts.³ This total represents the number of unique prime contractors doing business with the DoD during FY 2005. With few exceptions, place of performance is based on the location where the work is performed. In many cases, domestic and foreign contractors have multiple contracts with places of performance in the U.S. and overseas.

Out of the 92,416 companies with DoD contracts in FY 2005, 83,808 were U. S. based and 8,608 were based overseas. Figure 2 depicts this and also shows the place of performance break out between CONUS and OCONUS, or both.

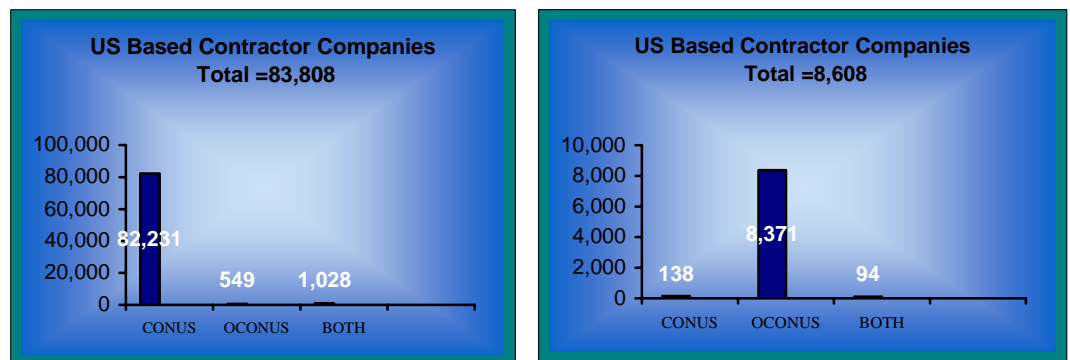


Figure 2. Contractor Basing and Place of Performance

Source: See Footnote 3.

² Guard: 197,776; Reserves: 875,024 (Does not include Individual Readiness Reserves -1,322,752).
³ From the Defense Contract Action Data System, which accounted for over 1.3 million individual contract actions and \$269 billion dollars during FY05. The system is maintained by the Statistical Information Analysis Division of the Defense Manpower Data Center.

The task of educating and enforcing the laws and regulations on trafficking in persons is a challenge to the entire DoD population, including the large number of DoD contractors.

Congressional Testimony. On September 21, 2004, the DoD IG testified before Congress at a hearing titled “Enforcing U.S. Policies against Trafficking in Persons: How is the U.S. Military Doing?” Senator Clinton asked if the IG would be considering labor trafficking and debt bondage issues, as well as sex trafficking, within the inspection process. The IG stated: “Yes. In fact, when I found out about the Indian allegation [on debt bondage], I immediately put on my oversight hat and we’ll follow up if there is any DoD nexus there to make sure that we are turning every stone.”⁴ Additionally, the DoD Acting Inspector General testified before Congress on June 21, 2006, providing an update on OIG initiatives into the area of human trafficking.⁵

Historical and Cultural Issues Regarding Commercial

Sex. Commercial sex is a historical and cultural issue that complicates DoD efforts to combat TIP. The sex slave trade can be traced back to at least before ancient Babylon. “It is likely that commercial prostitution derived directly from the enslavement of women and the consolidation and formation of classes. Military conquest led to the enslavement and sexual abuse of captive women in the third millennium

B.C. As slavery became an established institution, slave-owners rented out their female slaves as prostitutes, and some masters set up commercial brothels, staffed by slaves.”⁶ Military personnel receiving sexual services from local women in the areas surrounding the camps or bases is a well-known and documented fact. There are several books and reports about women that became military-base prostitutes during the Philippine occupation, Korean War, and Vietnam War. Some women used prostitution as a means to escape poverty, especially during the Korean War.⁷



Figure 3. Hilltop Club located near the Young Chon Hotel. In S. Korea (Circa 1977) (51st FW Archives)

Steps Taken to Rectify the Historical Abuse of Women. In 1974, a Commission on Human Rights convened to revise the 1949 Universal Declaration of Human Rights.⁸ This commission established guidelines for the following:

- Prevention of prostitution
- Rehabilitation of persons involved in prostitution
- Repression in the traffic of persons
- Prevention and treatment of venereal disease
- Organization of global programs for the prevention of international prostitution.

⁴ www.dodig.mil/fo/JES_TIP_Testimony_092104.pdf

⁵ <http://www.dodig.mil/fo/Final%20DoD%20OIG%20TIP%20Testimony%2021%20Jun%2006%201400.pdf>

⁶ Lerner, G., 1986, *The Creation of Patriarchy*, New York: Oxford University Press

⁷ Katharine H. S. Moon, *Sex Among Allies: Military Prostitution in U.S. - Korea Relations* (New York: Columbia University Press, 1997) 28.

⁸ This declaration expresses an ethic of responsibility towards the equality of all human beings.

United Nations Actions. In 1998, the United Nations (UN) General Assembly established a committee to negotiate an international convention against transnational organized crime. In 2000, the protocol to prevent and combat trafficking in persons was added to this convention.

U.S. Government Actions. The U.S. Government (USG):

- Enacted the Trafficking Victims Protection Act (TVPA), Public Law (P.L.) 106-386, which authorized the provision of a number of benefits and services to trafficking victims. (October 2000)⁹
- Enacted the Military Extraterritorial Jurisdiction Act (MEJA), giving the U. S. Government the authority to prosecute DoD-affiliated civilians and contractor personnel who commit felony offenses while overseas. (November 2000)
- Established the Office to Monitor and Combat Human Trafficking in the U.S. Department of State (DoS). This office is designed to integrate the USG's enforcement and other response efforts in combating TIP. (February 2002)
- Published the National Security Presidential Directive 22 (NSPD 22) establishing a zero tolerance policy on TIP. (December 2002)
- Published a Federal Acquisition Regulation interim rule on TIP. (April 19, 2006)

DoD Actions. DoD:

- Published Deputy Secretary of Defense (DepSecDef) and Secretary of Defense (SecDef) policy memoranda establishing a “zero tolerance” on TIP. (January 2004/September 2004—See Appendix D.) The memoranda directed that DoD and commanders:
 - Establish a systemic method for evaluating efforts to combat trafficking in persons (TIP) as part of ongoing evaluation programs conducted by IG organizations
 - Ensure units are trained to understand and recognize “indicators” of TIP
 - Use all of the tools available, including DoD Inspectors General and criminal investigative organizations, to combat these prohibitive activities.
- Published an Undersecretary of Defense (Personnel and Readiness) (USD [P & R]) memorandum establishing a requirement for TIP awareness training for deploying DoD personnel. (November 2005—See Appendix D.) (The TIP awareness training is available at www.projects.aadlcolab.org/tip/.)
- Worked with North Atlantic Treaty Organization (NATO) to establish a zero tolerance for NATO forces and staff. (June 2004—See Appendix D.)
- Published the DoD instruction implementing the MEJA. (See www.dtic.mil/whs/directives/corres/pdf/i552511_030305/i552511p.pdf.) (March 2005)
- Published new specification on Patronizing a Prostitute, as an addition to the existing charge of Pandering and Prostitution under Article 134 of the Manual for Courts-Martial (MCM). (October 2005) (See www.dod.mil/dodgc/olc/docs/EO13387.pdf.)

⁹ www.vitalvoices.org/files/docs/VTVPA%202000.pdf

- Coordinated a Defense Federal Acquisition Regulation interim rule that will require a TIP related contract clause in all DoD contracts. (Projected release December 2006.)

Non-governmental Organizations (NGOs) and TIP. Non-governmental organizations



(NGOs) are very much engaged in solving problems associated with TIP. The evaluation team met with NGO representatives to get their perspective on the problem of TIP as it relates to the military. There are many NGOs that have instituted human rights programs built around TIP. For example, Vital Voices, a global partnership, empower women who are leading social, economic, and political progress in their countries. Equality Now, another NGO, is an international human rights organization dedicated to actions promoting the civil, political, economic and social rights of girls and women, and they are vigilant in combating trafficking. Equality Now was adamant in ensuring DoD understood that support for the commercial sex industry perpetuates the abuse of women and undermines efforts to combat sex trafficking. These organizations have subject matter experts who have provided a keen perspective and in-depth information to DoD on trafficking in persons. Appendix J lists other NGOs that are involved in combating trafficking in persons.



Press Reports. Soon after the Fox news report aired in March 2002, media headlines criticized DoD for its lack of efforts to stop TIP. Some of the headlines follow:

- “Filipina and Russian women are being sold into sexual slavery in the seedy bars and nightclubs that serve U.S. military bases in South Korea” (Base Instincts: August 12, 2002).
- “The United Nations, human trafficking and prostitution” (World Socialist Web site Bosnia: August 21, 2002).
- “Thousands of women forced into sexual slavery for U.S. servicemen in South Korea” (Feminist Daily News Wire: September 9, 2002).
- “Does U.S. abet Korean sex trade?” (St. Petersburg Times: December 9, 2002).
- “The U.S. military whitewashes the exploitation and trafficking of women in S. Korea” (Freelance writer, College Park, Maryland Base Intentions: May 2004).
- “U.S. stalls on human trafficking; Pentagon has yet to ban contractors from using forced labor” (Chicago Tribune: December 25, 2005).

Evaluation Methodology

On November 18, 2005, after preliminary inquiries into the issues highlighted in the congressional letter and press reports, we announced this evaluation. This report examines actions taken by OSD, the Joint Staff, the Services, selected Combatant Commands, and installations to combat trafficking in persons.

The objectives of the evaluation were:

a. Determine if DoD directives, implementing instructions, organization, metrics, and resources are adequate for the DoD components to develop implementing programs with actionable objectives.

b. Determine if TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP, as well as fostering behavioral changes among DoD civilian employees/contractor personnel/Service Members

c. Determine if laws and international agreements are sufficient to give commanders the requisite authority “outside the gate.”



We conducted the evaluation in three phases.

a. Phase 1: Research and Preparation. (1) The team conducted research and document review and discussed the evaluation topics with the OSD, DOS, the Office to Monitor Trafficking In Persons and other selected agencies. (2) We also posted a Web-based survey on the DoD IG Web Site. (See Appendix G—Web-Based Survey Questionnaire, and Appendix H—Web-Based Survey Results.)

b. Phase 2: Unit Visits/Execution. The evaluation team visited units and organizations to gather facts and collect data through command interviews, small group sensing sessions, and document reviews.

c. Phase 3: Report Completion. The team analyzed data to formulate appropriate observations and recommendations.

See Appendix A—Methodology for additional details.



Figure 4. Maj Richard Higdon, a DoD IG evaluator, conducting a sensing session with the Marines in Hawaii

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Chapter 1 – Office of the Secretary of Defense/Joint Staff



Objective: Determine if OSD and the Joint Staff (JS) developed directives, implementing instructions, organization metrics, and resources that are adequate for the DoD Components to develop implementing programs with actionable objectives.



Office of the Secretary of Defense:

OSD is the principal staff element of the Secretary of Defense for policy development, planning, resource management, fiscal, and program evaluation responsibilities.¹⁰

The Under Secretary of Defense for Personnel and Readiness (USD[P&R]) is responsible for the DoD TIP program. The Principal Deputy, Under Secretary of Defense for Personnel and Readiness (PDUSD[P&R]), is the Department lead.

The Director, Law Enforcement Policy and Support (LEP&S), is the Department coordinator, and he is a staff of one who manages the DoD TIP program. According to the NSPD–22, “Agencies shall review their internal structures, personnel requirements, capabilities, information systems, professional education programs, training procedures, legislative authorities, and budgets to accommodate the provisions of this directive Departments and agencies shall ensure that all of the appropriate offices within their jurisdiction are fully trained to carry out their specific responsibilities to combat trafficking.

This includes interagency cooperation and coordination on the investigation and prosecution of trafficking.” To manage NSPD-22 and SecDef requirements, LEP&S needs additional resources to handle all TIP-related requirements in a timely manner. Regardless, OSD has determined that, given higher priorities during a time of war, LEP&S staffing is adequate.

There is no budget line in DoD for TIP.

OSD created an ad hoc staff to coordinate TIP program activities. There are dedicated TIP program points of contact (POCs) in the Offices of the General Council, Education and Training, Overseas Contracting, Public Affairs, Undersecretary of Defense-Policy (USD[P]), USD Acquisition, Technology, and Logistics (USD [AT&L]), plus representatives of the Office of NATO Policy, office of the Joint Chiefs of Staff (OJCS), and Legislative Affairs. Although there are POCs to work issues, they do not

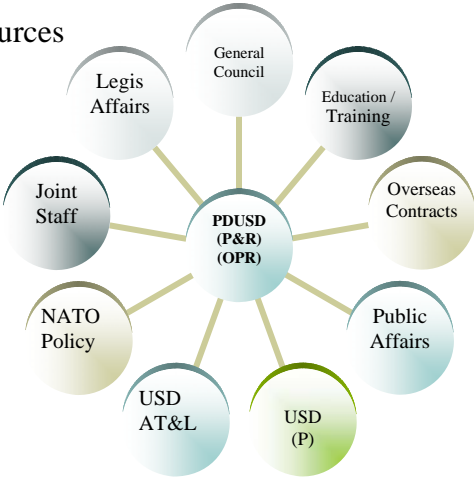


Figure 5. OSD internal TIP coordinating staff

¹⁰ www.defenselink.mil/osd/

have an organized venue where they all meet and discuss issues as an integrated, collective group. Moreover, Services' TIP POCs are not included in this ad hoc network.

DepSecDef published the DoD basic TIP "zero tolerance" policy memorandum on January 30, 2004 (Appendix D). SecDef reinforced this policy in his September 16, 2004, memorandum (Appendix D). In addition, on November 17, 2004, USD(P&R) issued training guidance in a directive-type memorandum (Appendix D). These documents set the TIP policy parameters and objectives for the Military Services and Combatant Commanders and were distributed through command channels.

Trafficking Victims Protection Reauthorization Act of 2005. The Trafficking Victims Protection Reauthorization Act of 2005 (TVPRA 05) amends the Trafficking Victims Protection Act of 2000 and directs the U.S. Agency for International Development (USAID), the DoS, and DoD to incorporate anti-trafficking and protection measures for vulnerable populations, particularly women and children, into their Departments' post-conflict and humanitarian emergency assistance and program activities. More information and a link to TVPRA 05 are on the DoS Web Site at: www.state.gov/g/tip/rls/61106.htm. TVPRA 05 directs that DoS and USAID, in consultation with DoD, conduct a study regarding the threat and practice of trafficking in persons generated by post-conflict and humanitarian emergencies in foreign countries. USAID led the study and provided the report to Congress.

United States Government Interagency Cooperation and Coordination. SecDef is a member of the President's Interagency Task Force to Combat Trafficking in Persons. The President's Interagency Task Force, chaired by the Secretary of State, meets annually. The Senior Policy Operating Group supports the President's Interagency Task Force and meets quarterly to coordinate interagency anti-TIP actions for the USG program. The PDUSD(P&R) attends the Senior Policy Operating Group. The Department works with its counterpart TIP offices in other Federal agencies on a regular basis to ensure that DoD TIP program initiatives and actions support the USG program. (See Appendix E.)

Joint Staff (JS):

The Joint Staff (JS) assists the Chairman of the Joint Chiefs of Staff in accomplishing his responsibilities for the unified strategic direction of the combatant forces, operation under unified commands, and for integration into an efficient team of land, naval, and air forces. The JS is composed of approximately equal numbers of Service Members from the Army, Navy (with 20 percent from the Marine Corps), and Air Force.

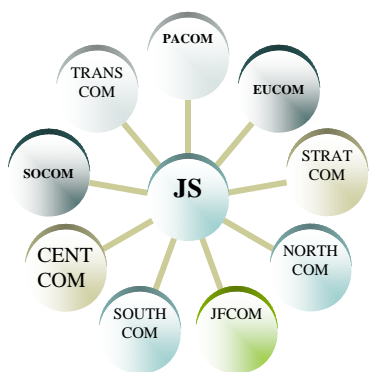


Figure 6. Combatant Commands

The Joint Staff trafficking in persons (JS TIP) coordinator is the Chief, National Security Law Branch within the J-5, International Negotiations Division. The coordinator acts as the liaison between OSD and the COCOMs. His duties include providing guidance and advice to COCOMs regarding the TIP program. The JS TIP coordinator helps the COCOMs establish and implement TIP policy, training

programs, demand reduction strategies, host nation(s) cooperation strategies, and an evaluation system.

Finally, the JS TIP coordinator ensures that all JS-assigned personnel complete the annual TIP training through their respective Service TIP training programs. Accordingly, the coordinator maintains contact with the Service TIP coordinators. The JS TIP Coordinator sends a Joint Staff Action Process form to the COCOMs and the Services requesting information to confirm actions completed, such as TIP online training.

OSD/JS Actions Taken/Proposed

Major OSD/JS Trafficking In Persons (TIP) initiatives:

- **TIP training programs**
 - Developed a pre-deployment trafficking awareness training module that is mandatory for all military members, DoD civilian employees, and DoD contractors who are going overseas. This awareness training will be extended to DoD military personnel and civilian employees through their Service components online modules or class room presentations by the end of FY 2006. Contractors will conduct training for their employees as required by the Defense Federal Acquisition Regulation. The overall goal of the training is to change attitudes about the sex exploitation industry and human trafficking and educate DoD personnel and contractors on the criminality and human rights consequences of trafficking in persons.
 - Developed TIP awareness training, in coordination and collaboration with other Federal agencies and NATO. The Web-based interactive training module is located at: www.jkddcjmo.org.
 - Drafted DoD policy directive. Coordination of the draft documents is ongoing and estimated publication date is January 2007. One area that needs clarification is the role and responsibilities of the Military Services and the COCOMs in combating TIP. The Military Services will be responsible for the TIP awareness training program for members of their department. The COCOMs will combat TIP within their respective areas of responsibility.
 - Developing TIP law enforcement and leadership training modules. (OSD has not projected a target date for completion.)

- **DoD contractors and “zero tolerance” policy**
 - Supported publication of a Federal Acquisition Regulation (FAR) interim rule on combating TIP on April 19, 2006. The interim rule applies to service contracts. The public comment period closed on June 19, 2006.
 - Coordinated on publication of the Defense Federal Acquisition Regulation Supplement (DFARS) interim rule (DFARS Case 2004-D017, October 26, 2006) that requires a TIP-related contract clause in DoD contracts performed outside the United States. Contractors performing DoD contracts outside the United States have to comply with U.S. law, host nation law, and local theater directives on combating TIP.
 - Addressing contractor responsibilities in both the FAR and DFARS interim rules for training employees on TIP and monitoring the conduct of their employees to ensure compliance. Both rules also address the requirement for the contractor to include

TIP provisions in subcontracts. This “zero tolerance” policy flows down to all subcontractors.

- **Military Extraterritorial Jurisdiction Act**
 - Provided a legal basis for arrest and prosecution of DoD-affiliated civilian and contractor personnel who commit felony federal offenses or war crimes while supporting the DoD mission overseas.
 - Expanded Military Extraterritorial Jurisdiction Act (MEJA) in the FY 2005 Defense Authorization Act to include civilians working under other Federal agency contracts that support DoD operations.
 - Published in March 2005 the DoD instruction (regulation) implementing the MEJA. The new instruction is available at: www.dtic.mil/whs/directives/corres/pdf/i552511_030305/i552511p.pdf as “Criminal Jurisdiction Over Civilians Employed By or Accompanying the Armed Forces Outside the United States, Certain Service Members, and Former Service Members.”

- **Prohibition on patronizing a prostitute**
 - Entered on September 15, 2004 a recommended amendment to the Manual for Court’s Martial (MCM), “Patronizing a Prostitute.” On October 14, 2005, the President signed Executive Order 13387, “2005 Amendments to the Manual for Courts-Martial, United States,” that expands Article 134, Uniform Code of Military Justice (UCMJ), to include the offense of "Patronizing a Prostitute." (See www.dod.mil/dodge/olc/docs/EO13387.pdf.)
 - Amended in October 2005 the Manual for Courts Martial (MCM). As a result, patronizing a prostitute is now a chargeable offense under the UCMJ.

Observations

During this evaluation, the responsibilities and roles of the Combatant Commands versus the Military Services became an issue with regard to training DoD personnel on TIP. The DoD policy memorandums do not delineate these roles. The OSD TIP coordinator advised the team that the forthcoming TIP DoD directive/instructions will state that “. . . the military departments (Services) will implement a TIP awareness training program for all members of their department, in accordance with DoD TIP policy . . . Combatant Commanders are responsible for combating TIP within their respective areas of responsibility”

TIP is an unfunded requirement that competes against all other DoD requirements.

Conclusions

DoD should publish a DoD Directive and/or implementing instruction to further improve the OSD and JS TIP programs.

OSD has a program in place to manage TIP policy, programs, and issues; the program has minimum resources due to competing priorities. Management should expedite completion and release of the DoD policy directive and/or implementing instruction. More than 2 years have elapsed since DepSecDef published the January 2004 policy memorandum.

OSD and JS have ongoing TIP initiatives to improve the DoD ability to combat TIP. Because no separate budget line for TIP exists, OSD/JS developed an informal network of POCs who manage and implement the DoD TIP program. That network should be institutionalized.

OSD and JS have made progress in the use of information systems and training procedures to expand TIP awareness programs.

Recommendations for the Office of the Secretary of Defense and Joint Staff

1. Complete and publish the DoD Directive and/or implementing instruction for the TIP program that assigns clear roles and responsibilities. (OPR: USD[P&R]; OCR: COCOMs, Military Services)

2. Establish and document a requirement for a periodic OSD TIP Coordinating Council meeting to review issues and to integrate DoD TIP program improvements. USD(P&R) should consider including the Services' TIP POCs. (OPR: USD[P&R])

3. Include TIP training in Joint and Service institutional training curricula, at all levels, for both officers and enlisted Service Members. (OPR: USD[P&R]; OCR: Director, Joint Staff; Military Services)

4. Include TIP-related considerations when developing plans for establishing new overseas bases, for example, anti-TIP language in DoD contracts and pre-deployment TIP training requirements for Service Members, DoD civilian employees, and contractors. (OPR: USD[P&R]; OCR: Regional COCOMs, Military Services)

5. Develop TIP training modules that are based on realistic, military-related TIP scenarios. (OPR: USD[P&R]; OCR: Military Services)

6. Establish a metric for tracking TIP awareness training and understanding of TIP-related policy and programs. The metric should track the total number of DoD personnel assigned and total number trained, broken out by military, DoD civilians, and DoD contractors. (OPR: USD[P&R]; OCR: Military Services)

Management Comments and OIG Response

The Under Secretary of Defense for Personnel and Readiness (USD[P&R]) “concurred with comment.” The comments addressed actions taken or planned to implement specific recommendations in the report that listed USD(P&R) as the OPR. The complete USD(P&R) response is at Appendix J.

The Director, Joint Staff “concurred without comment” regarding the specific recommendation related to the Joint Staff (recommendation 3 above). The Director also provided a matrix summary of responses from the various COCOMs (addressed separately). The complete response from the Director is at Appendix J.

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Chapter 2—Military Services

Objectives: Determine whether the Military Services TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among DoD civilian employees/contractor personnel/Service Members.

Determine if laws and international agreements are sufficient to give military commanders the requisite authority “outside the gate.”



Army:

The Army conducts both operational and institutional missions. The operational Army consists of numbered Armies, corps, divisions, brigades, and battalions that conduct full spectrum operations around the world. The institutional Army supports the operational Army. Institutional organizations provide the infrastructure necessary to raise, train, equip, deploy, and ensure the readiness of all Army forces.¹¹

Army Actions Taken/Proposed

- The Army designated a General Schedule (GS)-14 as the TIP policy POC within the Office of the Assistant Secretary of the Army for Manpower and Reserves Affairs. A lieutenant colonel (O-5) within the Army G-3 Training Directorate was designated the POC for DoD TIP awareness training throughout the Army. The Army’s TIP zero tolerance policy, dated July 24, 2006, applies to all soldiers (active and reserve), DoD civilian employees, and affiliated DoD contractors, contractor employees, and subcontractor employees. (See www.asamra.army.mil/ctip/index.html.)

Moreover, the Army policy:

- Opposes any and all activity associated with human trafficking.
- Enforces the law against all those who traffic in persons, as well as those who facilitate TIP.
- Applies worldwide, even if off duty and off the military reservation.
- Requires that commanders identify establishments that should be off limits.

¹¹ www.army.mil/organization/

- Requires immediate awareness training for all DoD military members, civilian employees, and contractor personnel who deploy overseas.
- Requires that commanders develop a program to assess TIP and related issues (for example, prostitution). The program must include awareness training and periodic assessments, using the IG and/or other investigative services.

Additionally, the Army:

- Posted the DoD TIP awareness training on the Reimer Distant Learning Library (July 06). This allows the Army G-3 to monitor and track the TIP training requirement. (See www.lms.army.mil/DLS.)
- Designated the Director, Training Developments Directorate, the Judge Advocate General's Legal Center and School, as the Army's TIP training requirement POC.
- Placed TIP policy and additional information on Army Knowledge Online to maximize education resources available to Army personnel. There is a link from Army Knowledge Online to the TIP awareness training on the Reimer Distant Learning Library. The Army recommends that first-time users of the Army Learning Management System view the learner log-in instruction vignettes located at www.dls.army.mil/lms_learner_login.html, or read the User Guide located at www.dls.army.mil/lms_training.html#2 before attempting to access the TIP training module. Experienced users may use the following link to access the Army Learning Management System and register for TIP training using their Army Knowledge Online log-in and password: www.lms.army.mil/DLS.
- Established an Army Web site dedicated to TIP for ensuring that each Army employee knows where to go for TIP policies, training modules, library, frequently asked questions, and command resources. (See www.asamra.army.mil/ctip/training.cfm.)



Navy:

The U.S. Navy maintains, trains, and equips combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. The Navy includes personnel, ships, aircraft, and shore bases, as well as the Marine Corps. The United States Coast Guard, usually under the Department of Transportation, is assigned to the Navy in times of national emergency.¹²

¹² www.navy.mil/navydata/organization/org-top.asp

Navy Actions Taken/Proposed

The Navy designated a commander (O-5) as the TIP POC within the Assistant Secretary of the Navy for Manpower and Reserves Affairs. A major (Marine O-4) within the Navy's Professional Development Branch was designated the POC responsible for distributing TIP information throughout the Navy.

The Navy established a three-prong approach to provide TIP training as a result of unique challenges faced by Navy organizations with afloat missions and deployed units. The Navy:

- Installed TIP courseware on Navy Knowledge Online. (See www.nko.navy.mil/.) A Naval Administrative Message 292/05, dated November 14, 2005, was sent to the fleet requiring that sailors take TIP training on Navy Knowledge Online. Completing the TIP course on Navy Knowledge Online provides tracking capability. As of May 10, 2006, the Navy reported that 238,781 personnel completed the TIP course online.
- Produced and distributed 3,200 TIP training Compact Disk Read Only Memory (CD-ROMs) to all Navy commands and the Armed Forces Information Services-Joint Visual Information Services Distribution Activity. This action was designed to overcome possible access limitations to Navy Knowledge Online for deployed sailors or units stationed outside the continental United States. Naval Administrative Message 061/06, dated February 17, 2006, provides detailed instructions on how to obtain the TIP CD-ROM. The message also explains how to document the training.
- Produced another 2,500 TIP CD-ROMs to ensure availability to fleet units for the near future. The Armed Forces Information Services-Joint Visual Information Services Distribution Activity handles this additional production. As of May 10, 2006, the Armed Forces Information Services-Joint Visual Information Services Distribution Activity had responded to 108 additional requests and mailed 222 TIP CD-ROMs to Fleet activities.

Marine Corps:



The U.S. Marine Corps (USMC) is a branch of the U.S. military under the United States Department of the Navy. Originally organized as the Continental Marines in 1775 for ship-to-ship fighting, shipboard security, and to assist in landing forces, by the early 20th century, the Marine Corps had grown both institutionally and organizationally into the dominant advocate for amphibious warfare. The Marine Corps has evolved into a multi-purpose role in the current U.S. military.¹³

¹³ en.wikipedia.org/wiki/United_States_Marine_Corps

Marine Corps Actions Taken/Proposed

The USMC designated a lieutenant colonel (O-5) as the TIP POC within their Military Personnel Plans and Policy Division. The POC develops policy and distributes TIP information throughout the Marine Corps. In April 2005, the Commandant of the Marine Corps sent a message to all Marines (ALL MARINES 016/05) stating that the Marine Corps opposes any activities that contribute to TIP. The message directs that Marines demonstrate awareness and behavior consistent with the National Security Presidential Directive-22 (NSPD-22), Trafficking in Persons. The Commandant's message:

- Tasked leaders at all levels to ensure that TIP awareness training is completed in accordance with the USD(P&R) memorandum, dated November 17, 2004.
- Directed DoD civilians and contractors to the training site located at www.jkddcjmo.org.

Additionally, the USMC established additional TIP online courseware. This training is available on the Marine Net Course Catalog at: www.marinet.usmc.mil/portal.



Air Force:

The mission of the U.S. Air Force (USAF) is to deliver sovereign options for defense of the United States of America and its global interests -- to fly and fight in Air, Space, and Cyberspace.¹⁴

Air Force Actions Taken/Proposed

The USAF designated a GS-13 as the TIP POC within the Air Force Culture/Military Equal Opportunity Force Sustainment Division, Airmen Development and Sustainment Directorate. They also assigned a lieutenant colonel (O-5) within the Military Training Policy Division to serve as the TIP focal point for information flow between installations and their respective major commands. The AF:

- Sent a message on February 27, 2006, stating, in part, “. . . commanders at all levels are directed to ensure their units are trained to understand and recognize indicators of the serious crime of Trafficking in Persons (TIP). Due to the seriousness of the crime, the AF has a zero tolerance approach to trafficking in persons”
- Expanded DoD policies by implementing two types of training—initial and annual refresher training for AF military, civilian, and contract personnel. The method of

¹⁴ www.af.mil/main/welcome.asp

training is the OSD-developed computer-based training. The computer-based training is available to major commands through the Air Education and Training Command Advanced Distributive Learning Server at <https://golearn.csd.disa.mil>. Access is also available through the AF portal.

- Appointed a TIP POC at each major command for tracking and reporting purposes.
- Established procedures for monitoring the Department's TIP program.
- Worked with Air Education and Training Command to provide TIP training for family members accompanying their sponsors overseas.

As of May 2006, almost 80,000 AF military, civilian, and contractor personnel completed TIP training by way of the Air Education and Training Command Advanced Distributive Learning Server site and another 7,000 completed TIP training by other means (some in Korea and Europe did not have access to the Air Education and Training Command Advanced Distributive Learning Server site). By October 26, 2006, the AF reported that 80 percent of their personnel completed initial TIP training. TIP is also a special interest inspection item for the AF Inspector General.

Conclusions

Training and Promoting Awareness. DoD sent out the first TIP policy memorandum to all the Military Services on January 30, 2004 (Appendix C). In April 2005, the Marine Corps was the first Military Service to dispatch a message about TIP and the zero tolerance policy. Today, all of the Military Services are training their personnel on TIP. The training includes TIP indicators and how to report suspected TIP activity.

Commanders Authority Outside the Gate. During our visits overseas (see Appendix A), all Military Service command officials stated that adequacy of local laws and the international Status of Forces Agreements (SOFA) depend on host nation support and involvement. Commanders can place establishments off limits, but do not possess authority to halt or challenge illegal/undesirable activity "outside the gate" without local law enforcement conformity and action on the matter. Nevertheless, none of the Military Service commanders or staff favored revising the SOFA solely to address TIP issues. Military Service Commanders did not see their authority "outside the gate" as a significant barrier to the implementation of an effective TIP program.

Overall, we conclude that the Military Services provide TIP training and their actions, separately and collectively, are (1) effectively promoting awareness of the applicable laws and restrictions regarding TIP, and (2) will enhance understanding of the TIP problem.

Recommendations for the Military Services

1. Include TIP training in each Service's institutional training curricula, at all levels, for both officers and enlisted Service Members. (OPR: USD[P&R]; OCR: Military Services)

2. Include TIP-related considerations when developing plans for establishing new overseas bases, for example, anti-TIP language in DoD contracts and pre-deployment TIP training requirements for Service Members, DoD civilian employees, and contractors. (OPR: USD[P&R]; OCR: Military Services)

3. Develop TIP policy and program guidance unique to each Military Service. Update after publication of DoD directive and/or implementing instructions. (OPR: Military Services)

4. Establish TIP-related training at all Power Projection Platforms and Mobilization stations and other similar pre-deployment training venues. (OPR: Military Services)

5. Include TIP training and planning as a part of the U.S. Army's Peacekeeping and Stability Operations Institute's mission. (One of the Army's Peacekeeping and Stability Operations Institute's missions is to help stabilize and rebuild societies.) (OPR: USD[P&R]; OCR: Army)

6. Establish a metric for tracking TIP awareness training and understanding of TIP-related policy and programs. The metric should track the total number of DoD personnel assigned and total number trained, broken out by military, DoD civilians, and DoD contractors. (OPR: USD[P&R]; OCR: Military Services)

Management Comments and OIG Response

The Army Assistant Secretary for Manpower and Reserve Affairs “concurred with comment” regarding the specific recommendations related to the Army or Military Services. The Army recommended that the metric referenced in Recommendation 6 (above) include a measure of the effectiveness of the TIP program. They also recommended that the DoD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing memoranda of understanding. The complete Army response is at Appendix K.

OIG Response: We passed the Army recommendations on to the Director, Law Enforcement Policy and Support in USD(P&R) for possible inclusion in the new DoD TIP directive that is currently out for formal staff comment.

The Navy Assistant Secretary for Manpower and Reserve Affairs and The Deputy Naval Inspector General for Marine Corps Matters/Inspector General of the Marine Corps “concurred” and assigned an OPR to the specific recommendations related to the Military Services. The complete Navy and Marine Corps response is at Appendix K.

The Air Force did not respond to our request for Management Comments. We will ask them to respond to the final report within 90 days of publication.

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Chapter 3—UNITED STATES PACIFIC COMMAND (PACOM)

Objectives: Determine whether U.S. Pacific Command (PACOM) TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among PACOM civilian employees/contractor personnel/Service Members.

Determine if current laws and international agreements are sufficient to give PACOM commanders the requisite authority “outside the gate.”

PACOM, in concert with other U.S. Government agencies and regional military partners, promotes security and peaceful development in the Asia-Pacific region by deterring aggression, advancing regional security cooperation, responding to crises, and fighting to win.¹⁵



PACOM Actions Taken/Proposed

PACOM:

- Designated a Colonel (U.S. Air Force O-6) as the TIP POC within the PACOM J-1 Directorate.
- Tasked PACOM J-1 to develop an Area of Responsibility (AOR)-specific TIP training module.
- Drafted a TIP policy letter that assigns responsibilities.
- Developed training slides that are made available to PACOM component commands directly from the PACOM Web site.
- Employed a PACOM IG systemic method for evaluating efforts to combat TIP.

PACOM is:

- Developing an AOR specific TIP training module.
- Planning to publish specific TIP-related policy upon receipt of DoD TIP directives/implementing instructions.

¹⁵ www.pacom.mil/about/pacom.shtml

Results

The PACOM leadership and staff:

- Reported no problems with trafficking in persons in Hawaii that had a PACOM nexus.
- Trained and deployed units and individuals to many countries designated by the U.S. State Department as TIP Tier 2 countries.¹⁶
- Relied on the Military Services to conduct TIP awareness training for assigned personnel.

Conclusions

DoD personnel assigned to Hawaii are considered nondeployed. The Military Services have only recently directed that nondeployed personnel must receive TIP awareness training. Nevertheless, PACOM and the Military Service commands in Hawaii are taking the appropriate TIP-related actions. TIP training is underway. PACOM will benefit from a DoD-level directive and/or implementing instruction for the DoD TIP program. The senior leadership at PACOM believes they have sufficient authority outside the gates of their installations, in coordination with local authorities.

Recommendations for PACOM

1. Develop TIP policy and program guidance unique to PACOM. Update after publication of DoD directive and/or implementing instruction.

2. Complete mandatory TIP awareness training for all DoD military members, civilian employees, and contract personnel.

3. Supplement DoD TIP training, to include unique cultural and legal considerations for PACOM's AOR.

4. Incorporate provisions in DoD contracts prohibiting any contractor employee activities that support or promote trafficking in persons.

5. Impose suitable penalties on contractors who fail to monitor the conduct of their employees.

6. Conduct command evaluations of the TIP program. (These evaluations should periodically involve the PACOM IG, per the DepSecDef policy letter on this subject [Appendix D].)

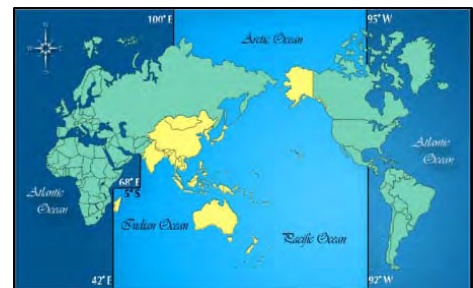


Figure 7. PACOM' Area of Responsibility

¹⁶ June 2005, State Department Trafficking in Persons Report.

Management Comments and OIG Response

The U.S. Pacific Command (PACOM) “reviewed the report” and only had “two minor comments,” editorial in nature, which we included in the report. Based on this response, we concluded that they “concurred” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or PACOM. The complete PACOM response is at Appendix L.

MILITARY INSTALLATIONS, HAWAII REGION

There are five major military installations in the Hawaii region:

- Fort Shafter
- Schofield Barracks
- Pearl Harbor
- Kaneohe Marine Air Station
- Hickam Air Force Base

Military Installations, Hawaii Region Actions Taken

- Published local base newspaper stories describing TIP.
- Published announcements of recent changes to the UCMJ Article 134, adding the specification “Patronizing a Prostitute.”
- Issued 15th Air Wing Commander Policy Statement, January 11, 2006, “Combating Trafficking in Persons.”

Results





We visited Naval Region Hawaii (Pearl Harbor), Kaneohe Marine Air Station, Hickam Air Force Base, and Schofield Barracks. The units we visited have deployment missions from Hawaii to locations throughout the PACOM AOR. The IG team reviewed command documentation and conducted sensing sessions with 188 personnel selected by unit leaders. During sensing sessions, only 46 percent of participants said they had received training on trafficking in persons. Additionally, 80 percent of the participants said they had been approached or knew someone who had been approached or solicited by a prostitute. More than 44 percent of the sensing

session participants thought prostitution was legal in Hawaii.

Hawaii statute, section 712-1200, states that prostitution “. . . is illegal in the entire state . . .”¹⁷ Despite the law, prostitutes walk the streets adjacent to Honolulu’s popular Waikiki Beach and solicit pedestrians. Hawaii’s KGMB 9 News aired a news story on December 12, 2005, detailing the Federal Bureau of Investigation’s arrest of 19 local citizens who were involved in a nation-wide prostitution and TIP ring.

Table 1 depicts partial results from the sensing sessions. (See Appendix I for complete sensing session results.)

Table 1. Sensing Session Highlights

DoD PERSONNEL ASSIGNED TO HAWAII				
				
Individual Responses			Yes	No
Did you receive information regarding U.S. policy on TIP from a government source?			86	102
Do you think you would recognize the signs or indicators of TIP?			103	85
Are you familiar with procedures for reporting suspected traffickers?			32	156

Conclusion

Military units in the Hawaii Region only recently received Military Service requirements to train all assigned Service Members on TIP. Hawaii’s military units and commands are taking the appropriate actions and will benefit from an OSD-level directive and/or implementing instruction for the DoD TIP program.

Recommendations for Overseas Military Installations (OPR: Military Services)

1. Establish a TIP office of primary responsibility and designate a TIP program officer.
2. Establish a memorandum of understanding with local law enforcement and non-governmental organizations (NGOs) who work with victims of TIP and prostitution at or near overseas military installations.

¹⁷ Honolulu Police Department Web site, www.honoluluupd.org/nv/morals.htm

Management Comments and OIG Response

The Army Assistant Secretary for Manpower and Reserve Affairs “concurred with comment” regarding the specific recommendations related to the Army or Military Services. They recommended that the DoD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing memoranda of understanding (recommendation 2 above). The complete Army response is at Appendix K.



Figure 8. Evaluator, Mr. Thomas McKenna briefing Marines prior to a sensing session

OIG Response: We passed the Army recommendations on to the Director, Law Enforcement Policy and Support in USD(P&R) for possible inclusion in the new DoD TIP directive that is currently out for formal staff comment.

The Navy Assistant Secretary for Manpower and Reserve Affairs and The Deputy Naval Inspector General for Marine Corps Matters/Inspector General of the Marine Corps “concurred” and assigned an OPR to the specific recommendations related to the Military Services. The complete Navy and Marine Corps response is at Appendix K.

The Air Force did not respond to our request for Management Comments. We will ask them to respond to the final report within 90 days of publication.

UNITED STATES FORCES JAPAN (USFJ)

United States Forces, Japan (USFJ) supports U.S. forward presence and ensures bilateral defense cooperation with the Government of Japan to promote regional stability and deter aggression. Should deterrence fail, USFJ conducts and supports combat operations in the region to defend Japan. In peacetime, the Commander, USFJ, represents the Pacific Commander in relations among U.S. forces and other Department of Defense elements, the Ambassador, the Japan Defense Agency, and other agencies of the Government of Japan.¹⁸



The evaluation team visited two major USFJ units at Okinawa—the 18th Wing and the Command Fleet Activities.

The 18th Wing at Kadena Air Base is one of the largest U.S. installations in the Asia-Pacific region. The Wing defends U.S. and Japanese mutual interests and provides a responsive staging and operational air base with integrated, deployable, forward-based airpower. The Wing’s mission centers around a force of 81 combat-ready fighters and various air refueling, airborne

¹⁸ www.globalsecurity.org/military/agency/dod/usfj.htm

warning and control, and search and rescue aircraft. The Wing also provides infrastructure support to Army, Navy, and Marine Corps forces assigned to or transiting Kadena. The Command Fleet Activities Okinawa (CFAO) employs 750 people who provide logistical support and services to the U.S. Seventh Fleet's air, surface and subsurface units operating in the Western Pacific. CFAO also provides facilities and support to deployed P-3 Orion patrol squadrons flying sea-lane surveillance missions out of Kadena.

USFJ Actions Taken

- Published USFJ Policy Letter Number 1, “Unwavering Professionalism.” (January 2006)
- Published the trifold “Our Commitment to Unwavering Professionalism.” (March 4, 2005)
- Published Service Component/installation-level TIP policy statements.
 - Commander, 18th Wing: “Those Service Members and DoD civilians that violate restrictions or participate, or support, TIP will be held accountable for their actions, as appropriate, under the UCMJ and Public Law.” (January 11, 2006)
 - Commander, Amphibious Group One: “Commanders must make significant efforts to identify and place off-limits an establishment displaying indicators of trafficking in persons.” (January 19, 2006)
- Published local base newspaper stories describing TIP problems and issues.



Figure 9. Military Newspaper

Results

Units stationed in the USFJ AOR are considered “forward deployed.” While visiting Kadena Air Base, the IG team reviewed command documentation and determined that commanders were keenly aware of the TIP issue and were actively engaged in promoting awareness through policy memoranda and base newspaper articles.





As a sub-unified command under PACOM, the USFJ Commander initiated an “Unwavering Professionalism” campaign that addresses many of the underlying components of the TIP issue. Each of the four Service Components in USFJ fully support the campaign and have implemented the mandatory TIP training modules for personnel deployed overseas.

Additionally, installation leadership schedules frequent courtesy patrols in the entertainment districts outside the U.S. installations.

The DoD IG team conducted sensing sessions with 218 personnel selected by unit leaders from each of the Services serving in Okinawa, Japan. Sixty-one percent of the sensing session

participants said they did receive information regarding U.S. policy on Trafficking in Persons. Of that 61 percent, 84 percent said the information was easy to understand and they knew the procedures for reporting suspected traffickers. The table below provides partial results from the sensing sessions in USFJ. (See Appendix I for complete sensing session results.)

Table 2. Sensing Session Highlights

DoD PERSONNEL ASSIGNED TO USFJ			
			
Individual Responses			
	Yes	No	
Did you receive information regarding U.S. policy on TIP from a government source?	133	85	
Do you think you would recognize the signs or indicators of TIP?	184	34	
Are you familiar with procedures for reporting suspected traffickers?	185	33	

Conclusions

Forces assigned to USFJ are considered deployed and require TIP awareness training. USFJ Service Components should take additional actions to strengthen Service Members’ awareness and understanding of the DoD TIP policies and programs.

Command officials in Okinawa stated that adequacy of local laws and international Status of Forces Agreements (SOFA) are dependent on host nation support and involvement. Commanders can place establishments off limits, but do not possess authority to halt or challenge illegal/undesirable activity “outside the gate” without local law enforcement conformity and action on the matter. Nevertheless, none of the Military Service commanders or staff in Okinawa favored revising SOFA solely to address TIP issues. Commanders in Okinawa did not see their authority “outside the gate” as a significant barrier to the implementation of an effective TIP program.

Recommendations for USFJ

1. Create an AOR-specific TIP training module, as required, to supplement DoD TIP training. Provide the training module to assigned Service Components for execution.
2. Establish a TIP office of primary responsibility and designate a TIP program officer.
3. Continue to emphasize Unwavering Professionalism as a way of life for all DoD personnel in Japan.

Management Comments and OIG Response

United States Forces Japan (USFJ) initially “nonconcurrent” with the original recommendations for USFJ, based on their view that Service Member training was a Service Component responsibility. They also provided some editorial comments on that section of the report that would improve the accuracy. The complete USFJ response is at Appendix L.

OIG Response: We incorporated their editorial comments, reworded recommendation 1 (above) and eliminated the original recommendation 3, replacing it with a new recommendation that was based on USFJ comments. USFJ reviewed these changes and “concurrent” with the report and the USFJ recommendations.

UNITED STATES FORCES KOREA (USFK)



United States Forces Korea (USFK) supports the United Nations Command and the Republic of Korea/U.S. Combined Forces Command by coordinating and planning among U.S. Component Commands in Korea; exercises operational control of U.S. Forces assigned as directed by PACOM; and coordinates U.S. military assistance to the Republic of Korea.¹⁹

USFK Actions Taken

The USFK anti-TIP program aggressively attacks the problem of TIP at the “strategic, operational, and tactical levels.”

Strategically, USFK works closely with the Republic of Korea (ROK) Government to establish policies, regulations, and legislative changes to mitigate what had been a fertile environment for prostitution and human trafficking.

At the operational level, USFK employs a command-wide program centered on a “zero tolerance policy” to combat prostitution and human trafficking (P&HT), providing the Command’s leadership with programs, resources, and an organizational framework to combat P&HT. Specifically, USFK developed a U.S. and ROK hotline for P&HT, additional community service programs and community councils, and improved U.S. and Korean National Police coordination.



At the tactical level, USFK has updated soldier-training programs, conducted undercover operations to identify establishments involved with P&HT, and increased leadership presence and involvement.

¹⁹ www.globalsecurity.org/military/agency/dod/usfk.htm

USFK has taken the following actions to combat the problem of TIP (not all-inclusive):

- Conducts monthly Armed Forces Disciplinary Control Board meeting to review off-installation liaison and operations.
- Maintains off-limits list of all establishments known or suspected of prostitution or human trafficking.
- Mandates awareness training of all new arrivals on P&HT.
- Includes mandatory P&HT training for all USFK Service Members, DoD civilian employees, and invited contractors at the quarterly “New Horizon Day.”
- Broadcasts public service announcements on Armed Forces Network (AFN).
- Prints recurring articles in base papers.
- Instituted hotline for P&HT.
- Established P&HT Task Force to investigate Hotline reports.
- Developed/published a memorandum of understanding between Headquarters, Area II Support Group and Itaewon Club Owners Association to ensure safety, security, and anti-prostitution/human trafficking measures.
- Established standard operating procedures training for courtesy patrols.
- Created posters, fliers, and information cards to educate personnel on the indicators and reporting procedures for suspected human trafficking.
- Established a P&HT working group, headed by an O-7, to coordinate the command’s efforts in combating P&HT.

Results

The anti-TIP efforts in USFK require a significant investment of manpower and money which may not be sustainable or necessary in other commands throughout the DoD. For example, in Area II Support Command (Seoul), the Command spends about \$952,000 and expends approximately 17,680 man-hours annually on TIP-related programs. (The South Korean peninsula is divided into seven Area Support Commands.)





This effort resulted in cultural changes involving all levels of the chain of command and local business owners. USFK leadership is actively engaging their personnel and the local businesses that surround military installations. Their goal is to develop alternative business models that appeal to military personnel and promote entertainment that does not contribute to or attract demand for trafficked women. Additionally, USFK has taken steps to improve Morale, Welfare, and Recreation programs throughout the peninsula. USFK conducted surveys that would

identify areas Service Members viewed as needing improvement and funding prioritization. In 2004, USFK spent \$3.4 million to improve its Morale, Welfare, and Recreation facilities. USFK’s goal is to go “above and beyond” what is the normal military Morale, Welfare, and Recreation program. (USFK receives \$1 million of the \$12 million a year from USFK Army recreation machines [slot machines]. The remaining funds are deposited into the “Army One Fund.”)

Of particular note in USFK is the Command’s correlation of human trafficking and prostitution. In the DoD IG entrance briefing, the USFK Commanding General stated that he viewed prostitution and human trafficking as one in the same. USFK calls the anti-TIP campaign “Prostitution and Human Trafficking.” Sensing session results show that USFK Service Members equate all prostitution as human trafficking. When questioned further, participants in USFK sensing sessions did not identify any U.S. personnel involved in actual trafficking. (In the DoD TIP evaluation’s Web-based survey (Appendix E), question number seven asks, “Are you aware of U.S. personnel involvement in activities that could be defined as TIP?” Out of more than 10,000 total respondents, 732 answered the question “yes.” These positive responses likely reflect the view that prostitution equates to TIP.)

While visiting USFK, the IG team reviewed command documentation and conducted sensing sessions with 240 personnel selected by unit leaders from U.S. bases in Korea. Each sensing session included a brief introduction detailing the purpose and methodology of the evaluation. The table below provides partial results from the sensing sessions in USFK. (See Appendix I for complete sensing session results.)

Table 3. Sensing Session Highlights

DoD PERSONNEL ASSIGNED TO USFK			
			
Individual Responses		Yes	No
Did you receive information regarding U.S. policy on TIP from a government source?		239	1
Do you think you would recognize the signs or indicators of TIP?		236	4
Are you familiar with procedures for reporting suspected traffickers?		240	0

Conclusions

The USFK anti-TIP program continues to set the standard for DoD efforts to combat TIP. The USFK leadership works, on a continuous basis, with assigned personnel and local businesses to combat human trafficking. TIP awareness is widespread and is a recurring theme at Newcomer’s Briefings, professional development sessions, and senior leadership meetings. Of the USFK sensing session participants, all but one said they had received training on TIP from the U.S.

Government. All of them thought the information was easy to understand and they knew the procedures for reporting suspected traffickers.

USFK has met the Secretary of Defense (SecDef) objective requiring “. . . commanders at all levels to ensure their units are trained to understand and recognize indicators of this serious crime.”²⁰

The Commander, USFK, noted that he had an excellent relationship with the Korean civil authorities and that he had the necessary authority to take appropriate actions “outside the gate.”

Recommendations for USFK

Establish a forum to meet periodically with Non-Governmental Organizations (NGOs) to review TIP-related issues and prevention initiatives.

Management Comments and OIG Response

United States Forces Korea (USFK) “concurred” with the report and the recommendation for USFK. The complete USFK response is at Appendix L.

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²⁰ Secretary of Defense memorandum, September 14, 2004, “Combating Trafficking in Persons Memorandum,” Appendix D.

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Chapter 4—U.S. EUROPEAN COMMAND (EUCOM)

Objectives: Determine whether U.S. European Command (EUCOM) TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among EUCOM civilian employees/contractor personnel/Service Members.

Determine if current laws and international agreements are sufficient to give EUCOM commanders the requisite authority “outside the gate.”

EUCOM maintains ready forces for conducting the full range of operations unilaterally or in concert with coalition partners; enhancing transatlantic security through support of NATO; promoting regional stability; countering terrorism; and advancing U.S. interests in the area of responsibility (AOR).²¹



EUCOM Actions Taken/Proposed

- Began a program to combat trafficking in persons (CTIP) across the EUCOM AOR. Efforts are underway to develop policy and programs necessary to inform EUCOM personnel about this program.
- Designated a lieutenant colonel (O-5) as the TIP point of contact/action officer.
- Continues to involve top EUCOM officials in developing TIP program requirements.

Results

TIP Awareness Program

Several factors played a role in the development of the EUCOM TIP awareness program. Those factors were:

- Reliance on the Military Services for TIP guidance/instructions for training military personnel on TIP issues.
- Confusion over SecDef’s intent and the type of TIP program appropriate at the EUCOM level.
- The geographic dispersion of EUCOM personnel into different countries.

²¹ www.eucom.mil/english/index.asp

- Senior leader involvement.
- Commander’s reactions.

TIP Training Responsibility

EUCOM officials stated that, in accordance with title 10, subtitle B, section 3013; subtitle C, section 5013; and subtitle D, section 8013 of the United States Code, the Service Secretaries organize and execute the TIP training program. EUCOM leadership noted that, since their AOR is so large geographically and encompasses so many different countries (see Figure 10 below), the logical place to train military personnel is with the Military Services before they are assigned to EUCOM.

Secretary of Defense TIP Policy Intent

Command officials report that the only official guidance they received concerning TIP was the Deputy Secretary of Defense (DepSecDef) memorandum dated January 30, 2004, and the SecDef’s memorandum dated September 16, 2004. Officials at EUCOM headquarters stated that these memoranda do not give adequate guidance to develop an effective program to combat TIP. They believe that OSD and the Military Services failed to issue adequate implementation guidance. Command officials comment that the “zero tolerance” policy could be interpreted to convey several different meanings, that is, do you place all adult entertainment “off limits” or only places that front prostitution and possible trafficking victims? (See “Commander’s Reactions” below.)

Dispersion of EUCOM Personnel

The EUCOM AOR encompasses ninety-two countries. Each of those countries has their own laws and unique set of circumstances/problems concerning TIP. Hence, the local unit TIP awareness program needs to reflect country-specific differences. For example, TIP awareness programs for countries where prostitution is legal will differ from countries where prostitution is illegal.

The number of personnel assigned to EUCOM units vary—some units have just a few individuals. In Kosovo, the U.S. military presence is small and declining. Military personnel, restricted to remote bases, are not allowed to mingle with the local Kosovo population. This base restriction effectively removes chances of military personnel providing a demand for trafficked sex workers. However, DoD contractors are not restricted to the base. Consequently, a TIP awareness program should target contractors to ensure they comply with the zero tolerance policy.



Figure 10. EUCOM Area of Responsibility

The U.S. Navy port calls across the EUCOM area of responsibility (AOR) also presents a challenge with TIP-related issues.

The growing presence of DoD contractors throughout the EUCOM AOR creates further challenges. Controlling off-the-job movement and behavior of DoD-contractors is more difficult than controlling off-duty Service Members.

Senior Leader Involvement


The draft EUCOM TIP policy letter for the Commander EUCOM was in the development and staffing process for over a year. The EUCOM TIP policy letter was signed in April 2006 and issued throughout the command. EUCOM policy incorporates the October 2005 change to the UCMJ prohibiting Service Members from soliciting or patronizing a prostitute, even where prostitution is legal.

Commanders’ Reactions

During this evaluation, we received reports that some commanders responded to TIP concerns by barring military personnel from all establishments that offer adult “striptease” entertainment. Barring all forms of “adult” entertainment is not required by current TIP policy; however, Service Component Commanders should bar personnel from such establishments if they have a reasonable suspicion that the establishment is a front for prostitution or that the employees are likely trafficking victims. Military personnel patronizing adult entertainment establishments are encouraged to be aware of the signs of trafficking and report suspicions to appropriate authorities.

The DoD IG team conducted sensing sessions with 115 EUCOM personnel selected by unit leaders, including individuals stationed in Bosnia/Kosovo. Each sensing session included a brief introduction detailing the purpose and methodology of the evaluation. The table below provides partial results from these sensing sessions. (See Appendix I for complete results.)

Table 4. Sensing Session Highlights

	DoD PERSONNEL ASSIGNED TO EUCOM		
	Individual Responses	Yes	No
Did you receive information regarding U.S. policy on TIP from a government source?	90	25	
Do you think you would recognize the signs or indicators of TIP?	75	40	
Are you familiar with procedures for reporting suspected traffickers?	76	39	

No Reported EUCOM Members Involved In Trafficking

During this evaluation, no indications surfaced of EUCOM personnel (military, civilian employees, or contractors) involved with actual TIP. However, during a sensing session, a service member reported that he believed that trafficked individuals are working on U.S. installations in Kuwait, through contracts with Kuwaiti companies. The Kuwaiti contractors reportedly use trafficked laborers. Kuwaiti law is supposedly lenient or nonexistent in prohibiting human trafficking for labor purposes. We discuss actions taken by the U. S. Central Command (CENTCOM) to address the issue of trafficked labor in Iraq and Kuwait in Chapter 7 of this report.

Corruption of Non-Governmental Organizations in Bosnia

We interviewed several NGO personnel in Bosnia. The interviewees alleged that, because of lawlessness and lack of any NGO oversight, many of NGO personnel are corrupt. The corruption process results in NGO personnel patronizing prostitutes and laundering money. We did not verify the accuracy of these allegations as they were outside the scope of this evaluation. Additionally, DoD has no authority over NGOs.

Conclusions

Continued senior leader involvement is necessary to assist in the development and maintenance of an effective TIP awareness program in EUCOM.

Although EUCOM has made progress in this area, the Command should develop a program tailored to local conditions across the EUCOM AOR. The EUCOM POC for TIP issues and training development is working to complete the Command's program to combat TIP.

The EUCOM leadership will benefit from additional guidance from DoD in the form of a Directive and/or implementing instruction.

While the EUCOM leadership believes they have the authority to take appropriate TIP-related action "outside the gate," they are unsure how to proceed with their "off limits" authority.

Recommendations for EUCOM

1. Develop TIP policy and program guidance unique to EUCOM. Update that guidance after publication of the DoD directive and/or implementing instructions.

2. Develop a video-based TIP awareness presentation and public service and public awareness announcements that depict realistic scenarios involving sexual exploitation and labor trafficking.

3. Conduct command evaluations of the effectiveness of TIP awareness training. (This evaluation should periodically involve the IG, per the DepSecDef policy letter on this subject [Appendix D].)

4. Include TIP-related considerations when developing plans for establishing new overseas bases, for example, anti-TIP language in DoD contracts and pre-deployment TIP

training requirements for Service Members, DoD civilian employees, and contractors.

5. Verify that Service Component Commanders place off-limits those establishments identified as a front for prostitution.

Management Comments and OIG Response

The U.S. European Command (EUCOM) “concurred with comment” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or EUCOM. They stressed that training individual Service Members was a Service Responsibility vice a COCOM responsibility, which we noted in Chapter 4 in the paragraph on “TIP Training Responsibility.” The complete EUCOM response is at Appendix L.

OIG Response: Based on EUCOM comments, we made changes to Chapter 4 in the paragraphs on “Senior Leader Involvement,” “Commander’s Reactions,” and “NGO Corruption in Bosnia.” We also reworded the EUCOM recommendation 5 (above) to reflect the Service Component responsibility to put establishments off limits if they are a front for prostitution.

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Chapter 5—U.S. CENTRAL, NORTHERN, SOUTHERN AND SPECIAL OPERATIONS COMMANDS

Objective: Determine whether the Combatant Commands TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among civilian employees/contractor personnel/Service Members.

In contrast to EUCOM and PACOM, the Headquarters for United States Central, Northern, Southern, and Special Operations Commands are in the continental United States. With the exception of U.S. Northern Command, the Combatant Command's assigned forces are outside the continental United States. Because of that, we directed our visits to only the headquarters for these combatant commands and, with the exception of a Northern Command component (detailed in Chapter 6), did not conduct sensing sessions with their component forces.

U.S. CENTRAL COMMAND (CENTCOM)



U.S. Central Command (CENTCOM) is one of the five geographically defined Combatant Commands within DoD. CENTCOM plans and conducts military activity in an AOR consisting of 27 countries in Northeast Africa, Southwest and Central Asia, and the island nation of the Seychelles. CENTCOM headquarters is located at MacDill Air Force Base in Tampa, Florida.²²

CENTCOM Actions Taken

- Designated a TIP representative (0-4) within the CENTCOM Manpower and Personnel (J-1) directorate.
- Issued memorandum, “Combating Trafficking in Persons,” dated July 25, 2005. This memorandum references and reinforces the SecDef TIP memorandum and states, “Commanders at all levels must be vigilant to this criminal activity, stressing proactive identification and appropriate action against any businesses or establishments involved in sexual exploitation. Additionally, commanders must be alert to and address any instances of questionable conditions of employment by DoD contractors or their subcontractors in the CENTCOM area of responsibility.” Additionally, in accordance with the Under Secretary of Defense TIP memorandum (Appendix D), the CENTCOM memorandum



Figure 11

²² www.centcom.mil/sites/uscentcom1/default.aspx

states that TIP awareness training is mandatory for all DoD military and civilian personnel.

- Drafted a TIP policy memorandum that assigns responsibilities and establishes procedures for the implementation of TIP awareness training. CENTCOM officials are awaiting the DoD directive and/or implementing instruction before issuing the policy memorandum because they want to avoid conflicting guidance or having to reissue the policy.
- Briefed TIP at the CENTCOM J-1 Conference in Qatar on April 20, 2006.
- Coordinated with the TIP POC at DoD to ensure that the CENTCOM TIP policy is complies with the draft DoD TIP directive and/or implementing instruction.

UNITED STATES NORTHERN COMMAND (NORTHCOM)



U.S. Northern Command (NORTHCOM) is one of the five geographically defined Combatant Commands within the DoD. DoD established NORTHCOM on October 1, 2002, to provide command and control of DoD homeland defense efforts and coordinate military assistance to civil authorities. The NORTHCOM AOR encompasses air, land, and sea approaches to the continental United States, Alaska, Canada, Mexico and the surrounding water out to approximately 500 nautical miles. It also includes the Gulf of Mexico, Puerto Rico and the U.S. Virgin Islands. NORTHCOM headquarters is located at Peterson Air Force Base, Colorado Springs, Colorado.²³

NORTHCOM Actions Taken

NORTHCOM has no requirement to conduct TIP training because only overseas Combatant Commands and personnel scheduled to deploy overseas currently have the TIP awareness training requirement.²⁴ However, NORTHCOM officials are aware of TIP concerns and have:

- Designated a TIP representative (O-4) within the NORTHCOM Joint Training and Exercises (J7) directorate.



Figure 12. NORTHCOM Area of Responsibility

²³ www.northcom.mil/Home.htm

²⁴ The draft of the DoD Directive “Combating Trafficking in Persons (CTIP)” proposes an annual TIP training requirement for all service members and DoD civilians.

- Coordinated with the TIP POC at DoD to ensure NORTHCOM TIP policy complies with the draft DoD TIP directive and/or implementing instruction.
- Published a Combatant Command (COCOM) TIP policy memorandum (May 8, 2006) requiring that assigned personnel complete TIP awareness training by August 15, 2006 and annually, thereafter. (80 percent completed training as of August 15, 2006.)
- Developed command briefings on TIP.
- Posted TIP awareness messages on their electronic message boards to heighten command awareness.

U.S. SOUTHERN COMMAND (SOUTHCOM)



U.S. Southern Command (SOUTHCOM) is one of the five geographically defined Combatant Commands within DoD. The SOUTHCOM AOR encompasses 32 countries (19 in Central and South America and 13 in the Caribbean). SOUTHCOM headquarters is located in Miami, Florida.²⁵

SOUTHCOM Actions Taken/Proposed

- Designated a TIP representative (GS-13) within the SOUTHCOM Strategy, Policy and Plans (J-5) directorate's Human Rights Division.
- Incorporated TIP into the Human Rights computer-based training required annually for all SOUTHCOM personnel (military, DoD civilian, and contractor).
- Held a Joint Interagency Coordination Group seminar in October 2005 in which TIP was the seminar topic. All of the SOUTHCOM directors were invited, along with more than 50 representatives of U.S. Government agencies.
- Plan to incorporate TIP guidance into the next revision of SOUTHCOM Regulation 1-20 (date to be determined). (At the time of this evaluation, SOUTHCOM had not issued TIP policy.)



Figure 13. SOUTHCOM Area of Responsibility

²⁵ www.globalsecurity.org/military/agency/dod/southcom.htm

UNITED STATES SPECIAL OPERATIONS COMMAND (SOCOM)



U.S. Special Operations Command (SOCOM) leads, plans, synchronizes, and, as directed, executes global operations against terrorist networks. SOCOM also trains, organizes, equips, and deploys combat ready special operations forces to combatant commands. SOCOM headquarters is located at MacDill Air Force Base.²⁶

USSOCOM Actions Taken

- Designated a TIP representative (O-6) within the office of the Headquarters, SOCOM Commander.
- Drafted a TIP policy letter stating that all SOCOM personnel will receive annual TIP training. SOCOM officials are currently preparing to commence the required training.

Conclusions

While CENTCOM, NORTHCOM, SOUTHCOM, and SOCOM have not issued a TIP policy, all of them are in the process of doing so.

They will benefit from the issuance of an anticipated DoD directive/implementing instruction.

Recommendations for CENTCOM/NORTHCOM/SOUTHCOM/SOCOM

1. Develop TIP policy and program guidance unique to each Combatant Command (COCOM). Update after publication of DoD directive and/or implementing instruction.
2. Implement mandatory TIP awareness training for all DoD military, civilian, and contract personnel.
3. Supplement DoD TIP training with training that includes unique cultural and legal considerations for the COCOM AOR.
4. Incorporate provisions in DoD contracts that prohibits any contractor employee activities that support or promote trafficking in persons.
5. Impose suitable penalties on contractors who fail to monitor the conduct of their employees.
6. Conduct command evaluations of the TIP program. (These evaluations should periodically involve the COCOM IG, per the DepSecDef policy letter on this subject [Appendix D].)

²⁶ www.socom.mil/Docs/Command_Mission-060214.pdf

Management Comments and OIG Response

The U.S. Central Command (CENTCOM) “concurred with no critical comments.” They addressed actions taken or planned to implement specific recommendations in the report related to Geographic COCOMs, COCOMs, or CENTCOM. The complete CENTCOM response is at Appendix L.

The U.S. Northern Command (NORTHCOM) “concurred” with the report and specific recommendations in the report related to Geographic COCOMs, COCOMs, or NORTHCOM. Their complete response is at Appendix L.

The U.S. Southern Command (SOUTHCOM) “concurred with comment” regarding specific recommendations in the report related to Geographic COCOMs, COCOMs, or SOUTHCOM. They recommended rephrasing recommendation 1 (above)—“Develop TIP policy and program guidance unique to each COCOM. Update after publication of the DoD directive and/or implementing instructions”—to read “Develop TIP policy and program guidance unique to each COCOM and Military Service after publication of the DoD directive and/or implementing instructions.” The complete SOUTHCOM response is at Appendix L.

OIG Response: Current policy letters from the Secretary of Defense, the Deputy Secretary of Defense, and USD(P&R) (Appendix D) are sufficient to develop basic COCOM TIP policy and program guidance.

The U.S. Special Operations Command (SOCOM) “concurred” with the report and specific recommendations in the report related to COCOMs or SOCOM. The complete SOCOM response is at Appendix L.

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Chapter 6—FORT BLISS, TEXAS/JOINT TASK FORCE NORTH

Objective: Determine whether Fort Bliss and Joint Task Force-North (JTF-N) TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if training fosters behavioral changes among civilian employees/contractor personnel/Service Members.

Fort Bliss, as a Mobilization Station (MS) and Power Projection Platform (PPP), trains, sustains, mobilizes, and deploys members of the joint team to conduct global, full spectrum operations in support of the national military strategy, while providing for the well-being of the regional military community.²⁷

We visited Fort Bliss primarily because it is a MS/PPP. As a MS/PPP, Fort Bliss must process, organize, equip, train, employ, and move reserve component Service Members onward for deployment.



While at Fort Bliss, we visited the 76th Military Police Battalion to determine the degree of TIP awareness in a military law enforcement organization.

We also visited JTF-N. JTF-N coordinates military-unique support to law enforcement agencies and supports interagency synchronization in order to deter and prevent transnational threats to the homeland. Because of this operational mission, we felt that a discussion with JTF-N officials about TIP would prove useful.²⁸



Neither the 76th Military Police Battalion, nor JTF-N, are subject to any current mandate for providing TIP awareness training since they are not deployed or deploying.

Actions Taken/Proposed

- The MS/PPP has incorporated TIP awareness training into the curriculum for deploying units/Service Members.
- The 76th Military Police Battalion has taken the initiative to issue a TIP policy memorandum. The memorandum states that soldiers must receive annual TIP awareness training and that TIP will be presented at new soldier in-briefings. Additionally, it states that soldiers must be trained no later than June 30, 2006.
- JTF-N officials stated that personnel received TIP awareness training, and they plan to issue a TIP policy letter upon further guidance from NORTHCOM and Fort Bliss.

²⁷ <https://www.bliss.army.mil/NewWeb/MyWebs/Ft-Bliss-Mission.htm>

²⁸ www.answers.com/topic/joint-task-force-north

- JTF-N has also initiated an action plan to appoint a JTF-N TIP coordinator and to include TIP in the IG inspection plan.
- The Fort Bliss Directorate of Plans, Training, Mobilization, and Security (DPTMS) / (G-3) is developing an installation TIP policy. The POC is a lieutenant colonel (O-5).

Results

Despite the installation’s close proximity to the U.S./Mexico border, base leadership informed us that there have been no reported incidents of TIP-related activity involving Fort Bliss or personnel stationed/working there.

Deploying Personnel

We conducted sensing sessions with 49 soldiers from the California and Oklahoma Army National Guard units that were at Fort Bliss in preparation for deployment. (The soldiers were selected by their unit.) As illustrated in Table 5, all 49 deploying Army National Guard Service Members received TIP awareness training as part of their mobilization requirements. The sensing session results from these Guard units indicate that “understanding” resulting from this training is at about the 66-percent level. The MS and unit chain of command should consider reinforcing key learning objectives from this TIP awareness training. (See Appendix I for complete sensing session results.)

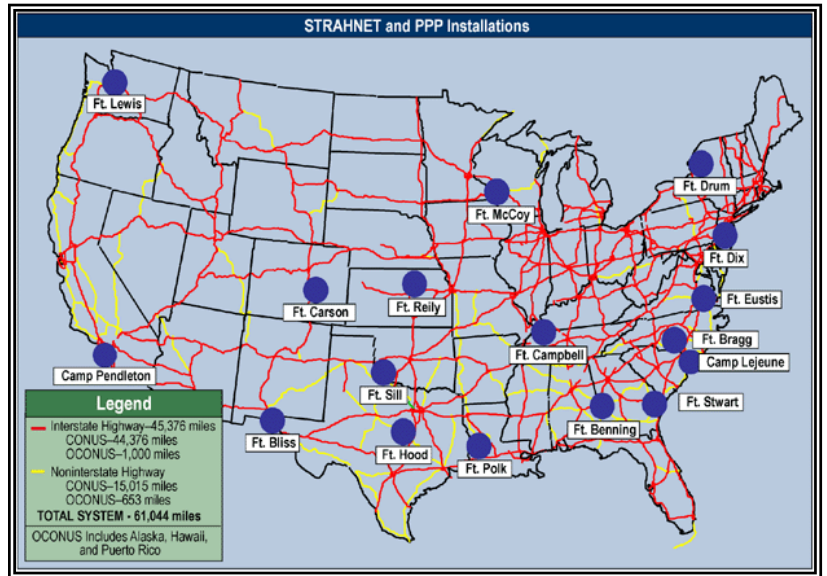



Figure 14. Mobilization Stations (MS)/Power Projection Platforms (PPP)



Table 5. Sensing Session Highlights

	Fort Bliss, Texas Deploying Army National Guard Soldiers		
	Individual Responses	Yes	No
Did you receive information regarding U.S. policy on TIP from a government source?	49	0	
Do you think you would recognize the signs or indicators of TIP?	31	18	
Are you familiar with procedures for reporting suspected traffickers?	37	12	

Non-Deploying Personnel

While no requirement exists for non-deploying DoD personnel to receive TIP awareness training, we conducted sensing sessions to gauge awareness of personnel from JTF-N and the 76th Military Police Battalion. Neither organization was scheduled to deploy. These sessions comprised 35 military, civilian, and contractor personnel that unit leaders selected. As shown below, all 35 of the non-deploying personnel that we spoke with had received TIP awareness training. (See Appendix I for complete sensing session results.)

Table 6. Sensing Session Highlights

	Fort Bliss, Texas Non-Deploying DoD Personnel	
Individual Responses		
	Yes	No
Did you receive information regarding U.S. policy on TIP from a government source?	35	0
Do you think you would recognize the signs or indicators of TIP?	34	1
Are you familiar with procedures for reporting suspected traffickers?	25	10

Conclusions

Service Members processing through the Fort Bliss MS/PPP receive TIP awareness training as part of their mobilization requirements.

While there have been no reported TIP-related incidents in the Fort Bliss area, an installation TIP policy is currently being drafted.

Although no current requirement exists for non-deploying Service Members to receive TIP awareness training, both the 76th Military Police Battalion and JTF-N trained their personnel on TIP and are working on TIP policy memoranda. Both organizations are to be commended for their efforts.

Recommendations for Installations

1. Finalize and issue installation-level TIP policy memoranda in accordance with OSD policy memoranda. Update after DoD publishes the directive and/or implementing instruction. (OPR: Military Services)
2. Conduct command evaluations of the effectiveness of TIP awareness training. (This evaluation should periodically involve the IG, per the DepSecDef policy letter on this subject [Appendix D].) (OPR: Military Services)

Management Comments and OIG Response

The Army Assistant Secretary for Manpower and Reserve Affairs “concurred with comment” regarding the specific recommendations related to the Army or Military Services. The Army recommended that the metric referenced in Recommendation 6 (above) include a measure of the effectiveness of the TIP program. They also recommended that the DoD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing memoranda of understanding. The complete Army response is at Appendix K.

OIG Response: We passed the Army recommendations on to the Director, Law Enforcement Policy and Support in USD(P&R) for possible inclusion in the new DoD TIP directive that is currently out for formal staff comment.

The Navy Assistant Secretary for Manpower and Reserve Affairs and The Deputy Naval Inspector General for Marine Corps Matters/Inspector General of the Marine Corps “concurred” and assigned an OPR to the specific recommendations related to the Military Services. The complete Navy and Marine Corps response is at Appendix K.

The Air Force did not respond to our request for Management Comments. We will ask them to respond to the final report within 90 days of publication.

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Chapter 7—Labor Trafficking

Objective: To determine whether appropriate actions were taken on alleged labor trafficking issues reported against DoD contractors in Iraq and Kuwait.

On July 1, 2004, *The Washington Post* published an article alleging a DoD contractor, Kellogg, Brown, and Root (KBR), engaged in “debt bondage” practices involving third-country nationals working in Iraq. The majority of the third-country nationals were migrant workers from Nepal, India, Pakistan, Bangladesh, Sri Lanka, and the Philippines. The article specifically cited a case involving Indian nationals. The Indian nationals worked in several odd jobs, including food service support.



Figure 15. In one of Saddam Hussein's former palaces in Baghdad, KBR prepares and serves meals to support the Coalition Provisional Authority (CPA) and military personnel. On average, KBR serves close to 250,000 meals per month at this dining facility.

KBR provides food service support in Iraq and Kuwait under a U.S. Army Logistic Civil Augmentation Program (LOGCAP) contract.²⁹ *The Washington Post* article states: [KBR] “skipped on expenses by not providing workers with adequate drinking water, food, health care or security for part of their time in the war zone.” Officials from the Office to Monitor Trafficking in Persons at the Department of State (DoS) asked DoD to investigate these allegations. The DoD IG worked with an Attorney/Advisor to U.S. Army LOGCAP, and U.S. Army Field Support Command, Rock Island, Illinois to review the allegation. The review determined that the Coalition Forces Land Component Command (CFLCC) was already taking action on the issue of labor trafficking, within their legal authority to do so.

Actions Taken—Labor Trafficking

On August 30, 2004, the Deputy Commander General of CFLCC responded to the reported concerns and sent out a memorandum to contractors listing corrective measures. (See Appendix F.) The memorandum requires that contractors:

- Incorporate Private Sector Labor Laws of the State of Kuwait into DoD contracts and extend applicability to cover employees while in Iraq.
- Incorporate use of employment contracts with each employee.

²⁹ Under the LOGCAP contract, KBR provides meals in the military dining facilities throughout the CENTCOM AOR. For example, from January through June 2006, KBR served 88 million meals across the CENTCOM AOR, excluding Kuwait (handled by a different contractor). Source: KBR Monthly Report to LOGCAP “Total Meals Prepared.”

- Maintain a list of driver employees that included:
 - Name
 - Nationality
 - Passport number
 - Civilian identification number
 - Name of sponsor.
- Provide this list to the respective embassy of each nationality employed.
- Issue company identification badges to employees with the information noted above, along with contract numbers and telephone numbers for the contractor and contracting officer.
- Provide life insurance for workers in Iraq in the amount of 10,000 Kuwaiti Dinars minimum, payable to an individual designated by employee.
- Pay a minimum monthly wage in the amount of 140 Kuwaiti Dinars and make electronic funds transfer of wages available to each employee.
- Pay an incentive premium of 5 percent of monthly wage for any month that included a mission into Iraq.

Additional Allegations and Actions Taken. In October 2005, a series of *Chicago Tribune* articles were published alleging instances of deception, involuntary servitude, debt bondage, and other improper labor practices by KBR and their subcontractors. The allegations stemmed from the kidnapping and murder of a dozen Nepalese men by insurgents. Other allegations were:

- Illegal confiscation of third-country nationals' passports.
- Deceptive hiring practices.
- Excessive recruitment fees.
- Substandard living conditions.

On January 18, 2006, the Office to Monitor and Combat Trafficking in Persons at the U.S. DoS requested OSD conduct an inquiry into these allegations. On April 18, 2006, the DoD IG completed that inquiry on alleged TIP practices by DoD contractors in Iraq, specifically regarding the Nepalese incident. The primary finding concluded that the U.S. Government had no jurisdiction over the persons, offenses, or circumstances that resulted in the Nepalese deaths. The DoD IG recommended to DoD the following with regard to the Nepalese incident:

- Continue prosecuting military members who become involved in TIP or TIP-related activities, in accordance with the UCMJ.

- Ensure that all new contracts incorporate the language of the anti-TIP Defense Federal Acquisition Regulation Supplement (DFARS) interim rule (DFARS Case D2004-D017).³⁰ Evaluate rewriting existing contracts to incorporate the language of the anti-TIP DFARS interim rule.
- Continue involvement of Military Department and Combatant Command Inspectors General in DoD efforts to combat TIP, within the limits of their authority to do so.

In February 2006, the Inspector General for the Multi-National Force-Iraq (MNF-I) completed an investigative inquiry into labor practices of contractors employed by MNF-I. As a result of this inquiry, officials in Iraq reported to the DoD IG that the Army Field Support Command at Rock Island, Illinois was modifying the LOGCAP basic contract with KBR to incorporate the pending DFAR interim TIP clause in all contracts.

Beginning on May 1, 2006, KBR was also:

- Conducting hands-on inspections of each subcontractor employee (throughout Iraq). The intent was to ensure each individual had physical possession of his or her passport, as U.S. law requires.
- Modifying existing contracts with their subcontractors to codify expectations of the USG and KBR in regard to human trafficking.
- Complying with the requirement for 50 square feet of living space for each subcontractor employee.
- Conducting formal TIP education and awareness training of KBR employees.
- Incorporating TIP awareness training into the curriculum of all new employees deploying to Iraq.

On May 15, 2006, the CFLCC Commander and the Principle Assistant Responsible for Contractors briefed KBR and other contractors on trafficking issues and TIP-related requirements for DoD contracts. (see Appendix F) The Principle Assistant Responsible for Contractors provided a copy of the FAR Clause 52.222-50 which stipulates the anti-TIP provisions that will be included in all DoD contracts for services.

Conclusions

The U.S. military leadership in Iraq and Kuwait are taking appropriate actions, within the limits of their authority and U.S. law, to control labor trafficking issues with respect to DoD

³⁰ DoD supported publication of a Federal Acquisition Regulation (FAR) interim rule on combating TIP (April 19, 2006). DoD also supported publication of the Defense Federal Acquisition Regulation Supplement (DFARS) interim rule (DFARS Case 2004-D017, October 26, 2006) that requires a TIP related contract clause in all DoD contracts performed outside the United States. Contractors performing DoD contracts outside the United States have to comply with U.S. Law, host nation law, and local theater directives on combating TIP. Comments on the DFARS interim rule should be submitted on or before December 26, 2006.

contractors.

Labor trafficking could also become an issue for other COCOMS—specifically for EUCOM as DoD establishes new bases in eastern Europe.

Recommendations—Labor Trafficking

1. Multi-National Force-Iraq (MNF-I) and Coalition Forces Land Component Command (CFLCC) conduct a follow-up review to ensure DoD contractor compliance with U.S. law and command policy regarding trafficking in persons. (OPR: MNF-I; OCR: CFLCC)

2. Include TIP-related considerations when developing plans for establishing new overseas bases, for example, anti-TIP language in DoD contracts and pre-deployment TIP training requirements for Service Members, DoD civilian employees, and contractors. (OPR: USD[P&R]; OCR: Regional COCOMs, Military Services)

Management Comments and OIG Response

Multi-National Force-Iraq (MNF-I) and Coalition Forces Land Component Command (CFLCC) “concurred” with report and specific recommendation in the report related to MNF-I and CFLCC. Their response was included in the CENTCOM response and is at Appendix L.

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Appendix A – Scope and Methodology

Scope

The DoD IG initiated this Crystal Focus project to address the concerns of Members of Congress, as expressed in writing and during congressional hearings. Members of Congress asked “what steps have been taken to address human sex trafficking?” and expressed concerns about U.S. military personnel and contractor involvement in sex trafficking. (Appendix B.) Accordingly, we examined TIP policies, programs, and actions taken at OSD, the Joint Staff (JS), PACOM, EUCOM, NORTHCOM, SOUTHCOM, SOCOM and CENTCOM, and a Power Projection Platform mobilization station at Fort Bliss, Texas. We also visited Joint Task Force NORTH (JTF NORTH) while at Ft. Bliss. The specific focus of the evaluation was to:

- a. Determine if DoD directives, implementing instructions, organization, metrics, and resources were adequate for DoD components to develop implementing programs with actionable objectives.
- b. Determine if TIP training effectively promotes awareness of applicable laws and restrictions regarding TIP and if the training fosters behavioral changes among DoD civilian employees/contractor personnel/Service Members.
- c. Determine if current laws and international agreements were sufficient to give commanders the requisite authority “outside the gate.”

Standards

The evaluation team performed this evaluation in accordance with the President’s Council on Integrity and Efficiency “*Quality Standards for Inspections*,” January 2005.

We derived standards specific to this evaluation from:

- Title 10, sections 3583, 5947, and 8583 of the United States Code, “Requirement of Exemplary Conduct,” November 18, 1997
- Public Law 106-386, Division A, 114 Stat. 1464, “Victims of Trafficking and Violence Protection Act of 2000” Reauthorization Acts 2003 and 2005
- NSPD-22, “Combating Trafficking in Persons,” December 16, 2002
- Deputy Secretary of Defense Memorandum, “Combating Trafficking in Persons in the Department of Defense,” January 30, 2004
- Secretary of Defense Memorandum, “Combating Trafficking in Persons,” September 16, 2004
- Under Secretary of Defense for Personnel and Readiness Memorandum, “Awareness Training for Combating Trafficking in Persons,” November 17, 2004

Methodology

A team of four DoD evaluators from the DoD IG, led by an Army lieutenant colonel, conducted this evaluation. The team was accompanied on some occasions by a GS 15 Division Chief. The coordinating agent for our activities was the primary IG at each location.

The team used a Web-based survey, sensing sessions, document reviews, and direct observation to facilitate meaningful dialogue with leadership and action officers across DoD.

Work Performed

- Reviewed specific OSD, JS, Military Services, and Combatant Commander policies and programs on TIP
- Reviewed prior coverage, evaluations, and inspections from the past 5 years associated with trafficking in persons
- Reviewed current draft reports or studies underway that involved or were related to the DoD TIP program and related issues
- Conducted interviews with senior OSD and Military Department officials
- Conducted interviews with NGOs
- Conducted sensing sessions with military units
- Conducted a Web-based survey available to all DoD personnel and contractors
- Reviewed current DoD policy/guidance and proposed drafts

Site Visits

The team spent approximately 1 day at each installation or activity that began with a PowerPoint presentation to the senior leadership. Subordinate organizational leadership was also invited, if appropriate. The major organization (Division, Fleet, Wing, Marine Expeditionary Force) gave a presentation of its plans, guidance, initiatives, and challenges for the TIP program. Unit visits consisted of individual and group interviews (sensing sessions). The purpose of those interviews was to assess the implementation and understanding of the TIP awareness program. Upon completion of each site visit, the team provided an exit brief to a senior leader or a designated representative. The exit brief consisted of the number of personnel contacted, documents reviewed, and general results of the sensing sessions.

We spoke with 848 Service Members (E-1 to O-6), DoD civilians, and DoD contractors during the on-site sensing sessions. We asked the participants questions to gauge their TIP awareness and to develop ideas for program improvement.

Organizations Visited

Under Secretary Of Defense for Personnel and Readiness (USD[P&R])
Office of the Joint Chiefs of Staff (J-5)
Assistant Secretary of the Army Manpower & Reserves Affairs (ASA[M&RA])

Combatant Commands:

U.S. Pacific Command (PACOM) and units in:

Hawaii

Japan (Okinawa)

Korea

U.S. Europe Command (EUCOM) and units in:

Germany

Bosnia

Kosovo

Italy

U.S. Southern Command (SOUTHCOM)

U.S. Northern Command (NORTHCOM)

U.S. Central Command (CENTCOM)

U.S. Special Operations Command (SOCOM)

U.S. Army Mobilization Station

Fort Bliss, Texas

Web-Based Survey

A Web-based survey was posted on the DoD IG Web Site from January through April 2006. (Appendix G.) All DoD personnel were encouraged to take the survey, which resulted in more than 10,000 responses. (Appendix H.) We wanted DoD personnel to take the Web-based survey. However, the general public could have accessed the survey and there were no controls in place to prevent an individual from taking the survey more than once. Given the magnitude of the response, these possible issues are unlikely to have substantially altered the results. Furthermore, the Web-based survey results provided only one set of data for consideration, along with the results of document review, interviews, observation, and sensing sessions. The Web-based survey results are a snapshot in time of TIP awareness across DoD and are not intended to predict future outcomes. However, the results can establish a baseline of TIP awareness in DoD.

Analysis

The sensing session and survey responses were reviewed and summarized for trends/observations in order to determine individual perceptions and what could be done to improve DoD efforts to combat TIP. Recommendations resulting from that analysis were discussed with subject matter experts and appropriate points of contact.

Other Actions

The evaluation team also discussed TIP labor issues with the Multi-National Forces-Iraq (MNF-I) Inspector General and with Logistics Civil Augmentation Program (LOGCAP) representatives.

Prior Coverage

DoD IG Reports

[“Assessment of DoD Efforts to Combat Trafficking In Persons Phase I United States Forces Korea,”](#) Case Number H03L88433128, July 10, 2003

In this report, the OIG team made the following recommendations for corrective action.

- Bolster human trafficking situational awareness in the context of ongoing emphasis on “Core Values” and “The NCO [noncommissioned officer] Creed.”
- Provide official “tool kit” to Service Members that includes:
 - The unclassified version of the Presidential Directive on Human Trafficking.
 - President Bush’s letter of February 20, 2003, announcing directive, and the requirements for exemplary conduct in Title 10.
 - The Trafficking Victim’s Protection Act of 2000.
- Develop and deploy a “human trafficking indicators” guide for sensitizing not only Military Police and Courtesy Patrols, but each Service member.
- Emphasize individual moral decision making based on Army Core Values and “The NCO Creed” as the ultimate metric for success.
- Continue to proactively pursue ongoing efforts to combat human trafficking, involving USFK leadership from top down.

[“Assessment of DoD Efforts to Combat Trafficking in Persons Phase II Bosnia-Herzegovina and Kosovo,”](#) Case Number H03L88433128, December 8, 2003

In this report, the OIG team made the following recommendations for corrective action.

- Continue to exercise vigilance to ensure military personnel adhere to laws and restrictions regarding activities related to human trafficking, such as prostitution. In particular, this should include regular reviews of the “Fighter Management Pass Programs” and inspections of rest and relaxation locations.³¹
- Amend General Order #1 to include provisions prohibiting engagement in all facets of prostitution and other activities related to human trafficking. These provisions should include punitive language to enable their enforcement through Article 92, UCMJ. For instance, the following subparagraph might be added to paragraph 3, “Prohibited Activities,” of General Order #1: “Engaging in any activities associated with human trafficking. Such activities include obtaining the services of a prostitute, purchasing individuals for the purpose of indentured servitude or prostitution, or patronizing establishments that are suspected of involvement in human trafficking.”

³¹ The Fighter Management Pass Programs offer service members stationed in the Balkans an opportunity to travel on pass to three alternative locations in Europe for rest and relation.

- Implement a training program designed to educate military personnel, contractor employees, and law enforcement personnel regarding human trafficking. Such a program should provide information on the legal, societal, and moral implications of engaging in activities that support human trafficking. In addition, law enforcement personnel should receive instruction in the provisions and application of the Military Extraterritorial Jurisdiction Act (MEJA), and especially in law enforcement measures necessary to support implementation of extraterritorial jurisdiction.
- Incorporate standard clauses in all contracts for work to be performed in Bosnia-Herzegovina and Kosovo that prohibits contractor employee involvement in activities that may support human trafficking and requires contractors to report to U.S. military authorities any information regarding involvement of their employees in such activities. Contractors should also be contractually bound to take appropriate measures to address such misconduct on the part of their employees. Contracting officers should be charged to aggressively enforce such provisions.
- Implement policies to promote regular communication between U.S. military authorities, local judicial and law enforcement authorities, and the Trafficking and Prostitution Investigative Unit. Such communication would include the exchange of information regarding involvement by members of Stabilization Forces and Kosovo Forces in human-trafficking related activities, and would facilitate investigations and prosecutions.

Continuing Coverage

Attorney General's Annual Reports to Congress on U. S. Government Activities to Combat Trafficking in Persons Fiscal Years 2004 and 2005.

www.usdoj.gov/whatwedo/whatwedo_ctip.html

DoS annual Trafficking in Persons Reports released in June 2004, 2005, and 2006.

www.state.gov/g/tip/rls/tiprpt/2006/

United Nations report Trafficking in Human Beings: Global Patterns (April 2006)

www.unodc.org/unodc/en/trafficking_human_beings.html

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Appendix B – Congressional Letters

Congress of the United States
Washington, DC 20515

May 31, 2002

The Honorable Donald H. Rumsfeld
Secretary of Defense
1000 Defense Pentagon
Washington, DC 20301-1000

Dear Mr. Secretary:

We write to request that the Pentagon immediately conduct an investigation into the veracity of a recent news report indicating that U.S. Army troops in South Korea are patronizing and guarding houses of prostitution where women are forced to prostitute themselves in order to buy their freedom from sexual slavery at the hands of traffickers.

A comprehensive news report compiled by investigative reporter Tom Merriman was aired over the past few weeks on Fox News in Cleveland, Ohio and in other markets, including Washington, DC. In March 2002, during an undercover investigation near Camp Casey in South Korea, Fox News captured on video U.S. Army Military Police on "courtesy patrol" – armed and in uniform – patrolling bars and brothels where trafficked women are forced to prostitute themselves. U.S. soldiers are the primary customers of these bars; and reportedly the courtesy patrol officers are there at the behest of their commanders to intervene if any of the soldiers get into trouble. The report identified the women in the establishments as having been trafficked internationally from the Russian Federation and the Philippines, as well as internally within South Korea.

The US Military Police caught on camera spoke candidly about the women's passports being taken from them by traffickers when they entered South Korea and about the women then being sold at "auctions" to bar owners – a classic scenario of human trafficking. If U.S. soldiers are patrolling or frequenting these establishments, the military is in effect helping to line the pockets of human traffickers rather than furthering our country's commitment, as expressed by the Secretary of State, to "work closely with other governments, organizations and concerned people throughout the world to put an end to this abomination against humanity."

As you know, the standing order issued by the U.S. Command in South Korea, USFK Reg. 190-2, prohibits service members from visiting houses of prostitution anywhere in the theater while they are stationed there. Korean law – which these servicemembers have a duty to respect – also prohibits the hiring of prostitutes. It is disturbing to receive information indicating that these orders are apparently being ignored and not enforced by the Command. We are also deeply concerned that American soldiers are knowingly procuring the services of trafficked persons and that some of these soldiers may even be ordered to protect and patrol the brothels.

Mr. Secretary, the existence of trafficked women in brothels near Camp Casey is indicative of the global scourge of modern day slavery that afflicts men, women and children. An estimated 700,000 to 2 million people – women and children in particular – are trafficked into slavery worldwide each year. Approximately 45,000 - 50,000 of these victims are brought into the United States annually. Many women and girls, such as those found in the brothels near Camp Casey, are enslaved in the commercial sex industry.

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The Honorable Donald H. Rumsfeld
Page 2
May 31, 2002

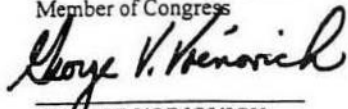
The vast scope of the problem of trafficking in human beings led to the enactment of the landmark Victims of Trafficking and Violence Protection Act of 2000 (VTVPA), Public Law 106-386. Pursuant to this law, substantial federal resources are now dedicated to preventing human trafficking, to investigating and prosecuting criminals who buy and sell human beings for the purpose of exploitation, and to providing comfort and assistance to trafficking victims.

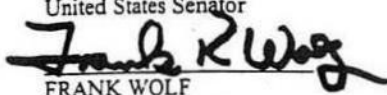
The VTVPA also contains provisions designed to motivate foreign governments to take similar measures to eliminate trafficking in human beings within their territories. As we attempt to achieve international cooperation to combat trafficking, the United States must lead by example.

It is imperative, therefore, that any investigation into this problem be thorough, global and extensive. In light of the reports that our soldiers are used to patrol establishments known to house enslaved women, this investigation must disclose who in the chain of command knew of or perhaps issued such assignments, when they were issued, and how long this activity has been in effect. If in fact they were following orders, we do not want to learn that the service members caught on videotape were reprimanded for discussing these matters. Rather, these issues must be addressed and remedied by those further up the chain of command. Such an investigation should also disclose whether there have been any investigations and/or disciplinary actions taken against military personnel who have violated the standing order for the region. Moreover, we would like to know if the Department of Defense is educating military personnel regarding trafficking in countries where there is a U.S. military presence.

When American soldiers acting in their official capacity effectively condone the practice of soliciting the services of trafficked persons, the efforts of Congress, the State Department, and other U.S. Government agencies are severely undermined in working to end the trafficking of human beings. We hope we have your support for launching an immediate and comprehensive investigation into this most serious of matters and we look forward to hearing from you on this issue shortly.

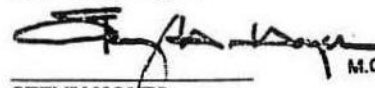

CHRISTOPHER H. SMITH
Member of Congress

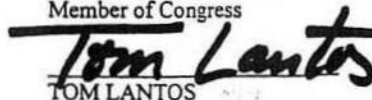

GEORGE VOINOVICH
United States Senator


FRANK WOLF
Member of Congress

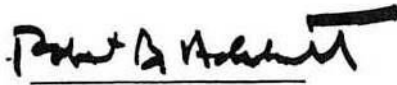
Sincerely,


DENNIS J. KUCINICH
Member of Congress

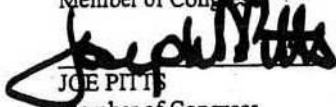

STENY HOYER
Member of Congress


TOM LANTOS
Member of Congress

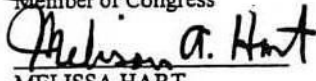
The Honorable Donald H. Rumsfeld
Page 3
May 31, 2002



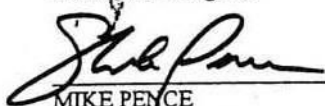
ROBERT ADERHOLT
Member of Congress



JOE PITTS
Member of Congress



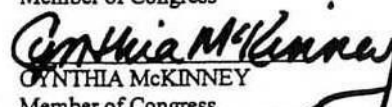
MELISSA HART
Member of Congress



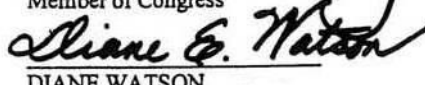
MIKE PENCE
Member of Congress



MARCY KAPTUR
Member of Congress



CYNTHIA MCKINNEY
Member of Congress



DIANE WATSON
Member of Congress

TOM DAVIS, VIRGINIA
CHAIRMAN

HENRY A. WAXMAN, CALIFORNIA
RANKING MINORITY MEMBER

ONE HUNDRED EIGHTH CONGRESS
Congress of the United States
House of Representatives
COMMITTEE ON GOVERNMENT REFORM
2157 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6143

Majority (202) 225-5074
Minority (202) 225-5051

SUBCOMMITTEE ON NATIONAL SECURITY, EMERGING THREATS,
AND INTERNATIONAL RELATIONS

Christopher Shays, Connecticut
Chairman
Room B-372 Rayburn Building
Washington, D.C. 20515
Tel: 202 225-2548
Fax: 202 225-2962

September 25, 2003

Joseph E. Schmitz
Inspector General
United States Department of Defense
400 Army-Navy Drive
Arlington, VA 22202

Dear Inspector General Schmitz:

The Subcommittee on National Security, Emerging Threats, and International Relations, with oversight responsibilities for all matters relating to national security, veterans affairs, and international relations, including anti-terrorism efforts, both foreign and domestic, and international trade, is examining alleged U.S. military personnel and contractor involvement in sex trafficking.

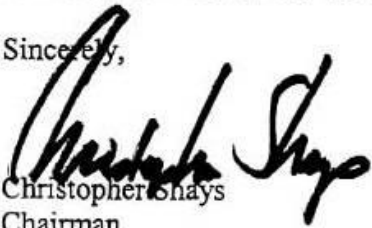
On August 27, 2003, our staff was briefed by your office about work being conducted at the request of several Members of Congress and this Subcommittee. We were troubled to hear commanders in South Korea waited until the arrival of your staff before placing establishments known or strongly suspected of human trafficking off limits to U.S. service personnel, despite the fact the problems involving those brothels and human trafficking

were well known before your visit. Given this limited response, we have little confidence other commanders in South Korea or in other areas of the world have addressed this potential problem.

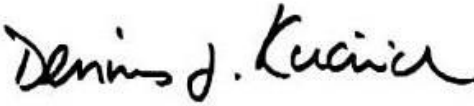
We request you follow-up on this investigation by sampling, and visiting as appropriate, other bases in South Korea and around the world about what steps have been taken to address human sex trafficking. In order to determine which bases might be of the most concern, we urge you to coordinate with the State Department, which reports on human trafficking regularly.

We look forward to hearing back from you by October 24, 2003. If you have any questions, please contact Thomas Costa, Professional Staff, of the Subcommittee at 202-225-2548 or TomCosta@mail.house.gov.

Sincerely,



Christopher Shays
Chairman



Dennis Kucinich
Ranking Member

cc. The Hon. Tom Davis
The Hon. Henry Waxman
The Hon. Colin L. Powell, Secretary of State

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Appendix C – National Security Presidential Directive-22

THE WHITE HOUSE
WASHINGTON
December 16, 2002

NATIONAL SECURITY PRESIDENTIAL DIRECTIVE/NSPD-22

MEMORANDUM FOR THE VICE PRESIDENT

THE SECRETARY OF STATE
THE SECRETARY OF THE TREASURY
THE SECRETARY OF DEFENSE
THE ATTORNEY GENERAL
THE SECRETARY OF LABOR
THE SECRETARY OF HEALTH AND HUMAN SERVICES
THE SECRETARY OF TRANSPORTATION
THE SECRETARY OF HOMELAND SECURITY
CHIEF OF STAFF TO THE PRESIDENT
DIRECTOR, OFFICE OF MANAGEMENT AND BUDGET
ASSISTANT TO THE PRESIDENT FOR HOMELAND
SECURITY
COUNSEL TO THE PRESIDENT
DIRECTOR OF CENTRAL INTELLIGENCE
ADMINISTRATOR, AGENCY FOR INTERNATIONAL
DEVELOPMENT
COMMANDANT, U.S. COAST GUARD
DIRECTOR, FEDERAL BUREAU OF INVESTIGATION
DIRECTOR, NATIONAL SECURITY AGENCY
COMMISSIONER, U.S. CUSTOMS SERVICE

SUBJECT: Combating Trafficking in Persons (U)

This National Security Presidential Directive instructs federal agencies to strengthen their collective efforts, capabilities, and coordination to support the policy to combat trafficking in persons. (U)

Policy Principles

The policy of the United States is to attack vigorously the worldwide problem of trafficking in persons, using law enforcement efforts, diplomacy, and all other appropriate tools. Trafficking in persons is a transnational threat, involves grave violations of human rights, and is an affront to human dignity and the principles for which this country stands. We must combat this trafficking and protect and assist its victims both domestically and globally. 2

4

It is important that all relevant agencies in the United States Government work together to address this worldwide problem. Trafficking in persons is often linked to organized crime, and profits from trafficking enterprises help fuel other illegal activity. The growth of vast transnational criminal networks supported in part by trafficking in persons fosters official corruption and threatens the rule of law. Trafficking in persons can have a destabilizing effect on nations, particularly vulnerable less-developed countries where erosion of the rule of law and decreased foreign investment can lead to increased poverty, violence, and other negative societal consequences. Our commitment to eradicate trafficking in persons reflects our values and our responsibility to defend human rights; it is, therefore, a critical element of the foreign policy of the United States. (U)

Our policy must include:

- Vigorously enforcing the law against all those who traffic in persons, including recruiters, transporters, harborers, buyers, and sellers, and including members of international criminal cartels and networks;
- Raising awareness at home and abroad about this unacceptable practice and how it can be eradicated;
- Identifying, protecting, and assisting those exploited by trafficking;
- Reducing the vulnerability of individuals to trafficking through increased education, economic opportunity, and protection of human rights; and
- Employing diplomacy and foreign policy tools to encourage other nations to work with us to combat this crime and hold accountable those who are engaged in it. (U)

Our policy is based on an abolitionist approach to trafficking in persons, and our efforts must involve a comprehensive attack on such trafficking, which is a modern day form of slavery. In this regard, the United States Government opposes prostitution and any related activities, including pimping, pandering, or maintaining brothels, as contributing to the phenomenon of trafficking in persons. These activities are inherently harmful and dehumanizing. The United States Government's position is

3

that these activities should not be regulated as a legitimate form of work for any human being. (U)

The policy of the United States is to treat trafficked people as victims. To that end, we will support initiatives that provide education and employment opportunities to victims of trafficking, as well as shelter and services as these victims rebuild their lives. We will also support initiatives to help prevent trafficking, particularly among vulnerable populations such as women and children, including effective educational campaigns to warn them of the dangers posed by traffickers. (U)

Structure

Given the transnational nature of this problem, strong coordination among agencies working on domestic and foreign policy is crucial. I have established the President's Interagency Task Force to Monitor and Combat Trafficking in Persons to coordinate domestic and international implementation of our policies to combat trafficking in persons in accordance with Executive Order 13257. The Task Force shall oversee the development of strategy, planning, and implementation in accordance with Executive Order 13257 of the United States Government policies on this issue, supported by a Senior Policy Advisory Group under the Democracy, Human Rights, and International Operations Policy Coordination Committee (PCC). (U)

Through the Senior Policy Advisory Group of the PCC, the Department of State, Department of Justice, Department of Labor, Department of Homeland Security, Department of Health and Human Services, Department of Defense, Department of the Treasury, U.S. Agency for International Development (USAID), Central Intelligence Agency, Office of Management and Budget, and others shall work together as needed to develop a coordinated strategy for active diplomatic engagement, marshalling law enforcement resources, gathering and sharing intelligence, obtaining international cooperation, and providing specialized law enforcement training as necessary to combat trafficking in persons. Under the direction of the Secretary of State, the Office to Monitor and Combat Trafficking in Persons in the Department of State will assist the Secretary, the Task Force, and the Senior Policy Advisory Group of the PCC with advice in the implementation of the Trafficking Victims Protection Act of 2000 (Division A of Public Law 106-386) and Task Force initiatives. (U)

Definitions

This directive adopts the definitions contained in the Trafficking Victims Protection Act of 2000 (Division A of Public Law 106-386). (U)

Plan of Action

1. Implementing Training in United States Government Agencies

Departments and agencies shall ensure that all of the appropriate offices within their jurisdiction are fully trained to carry out their specific responsibilities to combat trafficking. This includes interagency cooperation and coordination on the investigation and prosecution of trafficking. At a minimum, the following Department of Justice components shall have training programs in place: the Federal Bureau of Investigation, the Civil Rights Division, the Criminal Division, the Office of Justice Programs, and the U.S. Marshals Service. In addition, the Departments of Homeland Security, State, Defense, Labor, and Health and Human Services, and other departments and agencies, as necessary, shall develop and implement training programs. (U)

The United States hereby adopts a "zero tolerance" policy regarding United States Government employees and contractor personnel representing the United States abroad who engage in trafficking in persons. Departments and agencies shall adopt policies and procedures to educate, as appropriate, personnel and contract employees on assignment or official travel abroad about trafficking in persons, to investigate, as appropriate, any allegations of involvement in trafficking by such personnel, and to punish, as appropriate, those personnel who engage in trafficking in persons. To the extent permitted by law, punishment may include disciplinary actions for United States Government personnel, and civil remedies such as debarment and suspension procedures for United States Government contractors engaged in trafficking. (U)

2. Paragraph redacted because it was classified.

3. Developing Cooperation with State and Local Law Enforcement in the United States

To combat trafficking throughout the country, interagency and inter-jurisdictional cooperation is essential. Federal, State, and local law enforcement will need to take the initiative in investigations and prosecution. (U)

Local law enforcement officers play a crucial role in identifying trafficking in their jurisdictions. The Departments of Labor, Justice, Homeland Security, and Health and Human Services shall coordinate and offer specialized training and assistance to State and local law enforcement, as appropriate, to assist them in recognizing those exploited by trafficking and in combating trafficking rings and perpetrators. (U)

In addition, the training shall help law enforcement to distinguish between trafficking in persons and migrant smuggling and recognize efforts to abuse the immigration system for trafficking purposes. (U)

The Department of Health and Human Services, in conjunction with the Departments of Justice and Homeland Security, and other departments and agencies, as appropriate, shall develop a strategy to better identify and assist those adults and minors who have been victims of a severe form of trafficking. (U)

Part of paragraph redacted because it was classified.

Strengthening the Work of Regional and International Organizations to Prevent and Combat Trafficking: The Department of State in conjunction with the Departments of Justice, Health and Human Services, Homeland Security, and Labor, and USAID shall, through the Senior Policy Advisory Group, develop priorities and objectives for combating trafficking in persons through multilateral institutions, including the United Nations, the G-8, the Organization for Security and Cooperation in Europe (OSCE), the Association of Southeast Asian Nations, the African Union, and the Organization of American States. (U)

4. Paragraph redacted because it was it was classified.

5. Integrating and Coordinating International Programs

There are a variety of new and existing foreign assistance tools, including domestic and international grant-making

programs, contracts and sub-contracts, Memorandum of Understanding, technical assistance agreements, other funding mechanisms, public awareness campaigns, and other activities, that have been or can be used to combat trafficking in persons.
(U)

Departments and agencies shall coordinate U.S. foreign assistance programs, including those that provide funding to governmental or non-governmental organizations, bilaterally, multilaterally, or through international organizations, and public awareness programs to combat trafficking in persons. Departments and agencies will seek to ensure that contractors receiving U.S. funding are not engaged in trafficking or activities intended to further trafficking. Departments and agencies will ensure that their priorities are consistent with the policy set forth in this Directive as well as the Department of State's annual Trafficking in Persons Report tier classifications. Departments and agencies will develop a consensus, through interagency consultations and in consultation with United States Missions overseas, on the highest priority countries to receive anti-trafficking assistance. (U)

Implementation

Department and agency heads shall expedite implementation of this Presidential Directive. Agencies shall review their internal structures, personnel requirements, capabilities, information systems, professional education programs, training procedures, legislative authorities, and budgets to accommodate the provisions of this Directive. The Democracy, Human Rights, and International Operations PCC shall monitor agency implementation of this Directive and advise Deputies on any actions needed to improve implementation. Department and agency heads shall, within 90 days of the effective date of this Directive, promulgate plans to implement this Directive. Plans should be submitted to and coordinated with the Senior Policy Advisory Group of the Democracy, Human Rights, and International Operations PCC. (U)

A handwritten signature in black ink, appearing to read "John R. ...", is centered on the page below the implementation section.

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Appendix D – DoD & NATO Policy Memorandums



THE SECRETARY OF DEFENSE
1000 DEFENSE PENTAGON
WASHINGTON, DC 20301-1000

SEP 16 2004

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
COMMANDERS OF THE COMBATANT COMMANDS
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Combating Trafficking in Persons

I want to offer my view on this important matter to augment the January 30, 2004 memo on this subject.

Trafficking in Persons is the third largest criminal activity in the world, after illegal arms and drugs sales. It enslaves thousands of people. I am especially concerned with commercial sex exploitation and labor trafficking practices in areas near our overseas locations.

I want commanders at all levels to ensure their units are trained to understand and recognize indicators of this serious crime. I also want commanders to work with host nation law enforcement to identify businesses and establishments that are involved in trafficking for sexual exploitation. Once violators are identified, commanders then should take appropriate steps to put those establishments off limits to DoD members--military, civilian and contract civilian. No leader in this department should turn a blind eye to this issue.

Commanders need to be vigilant to the terms and conditions of employment for individuals employed by DoD contractors in their Areas of Operations. Trafficking includes involuntary servitude and debt bondage. These trafficking practices will not be tolerated in DoD contractor organizations or their subcontractors in supporting DoD operations.

Further, commanders should make full use of all tools available, including DoD Inspectors General and criminal investigative organizations, to combat these prohibited activities.

I am committed to taking every step possible to combat Trafficking in Persons.

A handwritten signature in black ink, appearing to read "R. M. Feld".



OSD 11599-04



DEPUTY SECRETARY OF DEFENSE
1010 DEFENSE PENTAGON
WASHINGTON, DC 20301-1010

JAN 30 2004

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
COMMANDERS OF THE COMBATANT COMMANDS
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Combating Trafficking in Persons in the Department of Defense

As set forth in National Security Presidential Directive/NSPD-22, "The policy of the United States is to attack vigorously the worldwide problem of trafficking in persons, using law enforcement efforts, diplomacy, and all other appropriate tools." The Commander in Chief has decreed that all departments of the United States Government will take a "zero tolerance" approach to trafficking in persons.

It is the policy of the Department of Defense that trafficking in persons will not be facilitated in any way by the activities of our Service members, civilian employees, indirect hires, or DoD contract personnel. Following the policy set by the Commander in Chief, DoD opposes prostitution and any related activities that may contribute to the phenomenon of trafficking in persons as inherently harmful and dehumanizing. Trafficking in persons is a violation of human rights; it is cruel and demeaning; it is linked to organized crime; it undermines our peacekeeping efforts; and it is incompatible with military core values.

The responsibilities of commanders and supervisors at all levels are clear, as codified by Congress under Title 10. Those statutory provisions require commanders and others in authority "to be vigilant inspecting the conduct of all persons who are placed under their command; to guard against and suppress all dissolute and immoral practices, and to correct . . . all persons who are guilty of them." Efforts to combat trafficking in persons in DoD begin with the recognition that all commanding officers and other DoD officers and employees in positions of authority are expected to conduct themselves in a manner that is consistent with statutory requirements for exemplary conduct.

I expect those in authority at all levels to examine opportunities for combating trafficking in persons and consider the attached objectives as part of that effort.

Attachment:
As stated



U19895 /03

Objectives of DoD Efforts to
Combat Trafficking in Persons

- The education of all Service members and DoD civilians serving overseas on the worldwide trafficking menace, national policy with respect to trafficking in persons, and attendant personal responsibilities consistent with military core values and DoD ethical standards.
- Within their authority to do so, increased efforts by command and military police authorities worldwide to pursue indicators of trafficking in persons in commercial establishments patronized by DoD personnel, place offending establishments off-limits, and provide support to host country authorities involved in the battle against trafficking in persons.
- Consistent with U.S. and host-nation law, the incorporation of provisions in overseas service contracts that prohibit any activities on the part of contractor employees that support or promote trafficking in persons and impose suitable penalties on contractors who fail to monitor the conduct of their employees.
- A systemic method for evaluating efforts to combat trafficking in persons as part of ongoing evaluation and inspection programs conducted by Inspector General organizations.



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

NOV 17 2004



MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
COMMANDERS OF THE COMBATANT COMMANDS
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Awareness Training for Combating Trafficking in Persons

The Secretary of Defense directed commanders, at all levels, to ensure their units are trained to understand and recognize indicators of the serious crime of Trafficking in Persons in the attached September 16, 2004 memorandum.

To support this direction, we developed an awareness training program on Trafficking in Persons. The program: (1) reviews U.S. Government policy on Trafficking in Persons; (2) examines the phenomenon of trafficking; (3) describes ways to identify persons who are trafficked; and (4) describes the legal provisions and their consequences for involvement with trafficking.

Combatant Commanders should supplement this basic instruction for unique cultural and legal considerations within their Areas of Operations. We are developing an Advanced Distributed Learning on-line version for global distribution in January 2005. DoD Component suggestions on improvements to the basic training package are invited.

Trafficking in Persons Awareness Training is mandatory for all DoD military and civilian personnel, and for DoD contract personnel, deploying overseas. The attached training package can be downloaded from <http://www.jkddcjmo.org>.

Should you have questions or need additional information my point-of-contact is Mr. John F. Awtrey at john.awtrey@osd.pentagon.mil or (703) 696-0846.

David S. C. Chu

Attachments:
As stated



NATO UNCLASSIFIED

27 May 2004

PO(2004)0057
Silence Procedure ends:
1 Jun 2004 08:30

To: Permanent Representatives (Council)
From: Secretary General

NATO POLICY ON COMBATING TRAFFICKING IN HUMAN BEINGS

1. Attached is a draft NATO policy on combating trafficking in human beings. The text has been developed in close consultation with PfP Partners, Mediterranean Dialogue Countries and troop contributing nations taking part in NATO led operations. The draft also draws on the experience of OSCE, UN and experts from government and non-government organisation.
2. Allies are invited to approve this policy and agree to forward the text to Heads of State and Government for endorsement at the Istanbul Summit. Once agreed by the NAC, I propose to circulate the NATO Policy to Partners.
3. At the meeting of EAPC Ambassadors on 16 June I will invite Partners to agree that the NATO policy be endorsed by EAPC Heads of State and Government at the Istanbul Summit.
4. Unless I hear to the contrary by **08:30 hours, on Tuesday, 1 June 2004**, I shall assume that the Council has approved the policy as well as the additional steps proposed at Paragraphs 2 and 3.

(Signed) Jaap de Hoop Scheffer

1 Annex
3 Appendices

Original: English

NATO UNCLASSIFIED

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NATO UNCLASSIFIED

ANNEX 1
PO(2004)0057

NATO POLICY ON COMBATING TRAFFICKING IN HUMAN BEINGS

1. This NATO policy takes into account the universal condemnation of the crime of trafficking in human beings and reiterates that it constitutes a serious abuse of human rights, especially affecting women and children. It is a transnational problem, requiring concerted multilateral action if it is to be defeated. Trafficking in human beings, affects countries of origin, countries of transit and countries of destination. This modern day slave trade fuels corruption and organised crime. It has the potential to weaken and destabilise fragile governments and runs counter to the goals of NATO-led efforts especially in South Eastern Europe. A zero-tolerance policy regarding trafficking in human beings by NATO forces and staff, combined with education and training, is required.
2. Allies reaffirm their commitment to promoting peace and security in the Euro-Atlantic Area and to combating the trafficking in human beings and agree the following policy. NATO will support and sustain further development of practical cooperation between nations and between NATO and other international institutions such as the UN, OSCE and International Organisation for Migration. NATO will also consult with NGOs active in this field with a view to improving its existing mechanisms and measures for the implementation of the present policy. Close exchange of information and experience between NATO and the EU should also be developed in accordance with agreed procedures.
3. This policy on combating the trafficking in human beings aims to reinforce efforts by NATO and individual nations to prevent and combat trafficking and the commitments undertaken in the context of other international organisations including the "UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime", and the OSCE Action Plan to Combat Trafficking in Human Beings. NATO and non-NATO troop contributing nations will develop and implement various measures that discourage the demand by their military and civilian personnel that fosters all forms of exploitation of persons.
4. In the context of this policy trafficking means, the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of use of force or other forms of coercion, of abduction, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others, or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
5. This policy is developed by NATO in consultation with its Partners and nations contributing forces to NATO-led operations. Allies re-affirm their commitment to ratification, acceptance or approval of the UN Convention and relevant Protocol and agree:

NATO UNCLASSIFIED

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NATO UNCLASSIFIED

ANNEX 1
PO(2004)0057

- (a) to review national legislation and report on national efforts to meet obligations associated with the UN Convention and its Protocol in accordance with the relevant decisions taken by the Parties to those treaties;
 - (b) to encourage all nations contributing forces to NATO- led operations to ratify, accept or approve the UN Convention Against Organised Crime and relevant Protocol and adhere to the OSCE Code of Conduct;
 - (c) that this policy is aimed at securing standards of individual behaviour;
 - (d) that all personnel taking part in NATO led-operations should receive appropriate training to make them aware of the problem of trafficking and how this modern day slave trade impacts on human rights, stability and security, as well as being informed of their own responsibilities and duties and the respective responsibilities of International Organisations in this field;
 - (e) in the conduct of operations, to continue efforts, within their competence and respective mandates, to provide support to responsible authorities in the host country in their efforts to combat trafficking in human beings;
 - (f) to incorporate contractual provisions that prohibit contractors from engaging in trafficking in human beings or facilitating it and impose penalties on contractors who fail to fulfil their obligations in this regard; and
 - (g) to evaluate implementation of their efforts as part of the ongoing reviews carried out by the competent authorities.
6. In order to ensure maximum effectiveness of the present policy, NATO nations commit themselves to ensure full national implementation of this policy. Non-NATO Troop contributing nations are expected to take similar steps upon joining a NATO-led operation.
7. NATO personnel serving at NATO Headquarters and its Agencies as well as those taking part in NATO led operations should continue to conduct themselves with regard to the highest professional standards and with respect to national as well as international law.

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NOTE: Appendices to above NATO policy not shown

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Appendix E – DoD Combating Trafficking in Persons Initiatives

INFORMATION PAPER

SUBJECT: DoD Combating Trafficking in Persons Initiatives

❖ **IMPLEMENTING TRAINING PROGRAMS:** OUSD(P&R) has developed a core awareness training module for all military personnel and DoD civilian personnel. **Status: Ongoing** - The general awareness interactive multimedia module and Power Point presentation are available for online instruction or classroom use at: www.jkddcjmo.org [Public View: <http://projects.aadcolab.org/tip11>]. The Military Departments have moved the interactive module to their respective Knowledge On-Line systems to accomplish the required training. CD copies of the interactive multimedia module are also available for distribution, as needed. Additionally:

- A separate training module for senior leaders is in production.
- A DoD law enforcement module is also under development.

❖ **ENSURING CONTRACTORS COMPLY WITH “ZERO TOLERANCE”:** A Federal Acquisition Regulation (FAR) interim rule on combating TIP was published on April 19, 2006. The FAR interim rule applies to contracts for services (other than commercial). The public comment period closed on 6/19/06. A Defense Federal Acquisition Regulation Supplement (DFARS) interim rule will require a TIP related contract clause in all DoD contracts performed outside the United States. Contractors performing DoD contracts outside the United States will have to comply with US Law, host nation law, and local theater directives on combating TIP. Both the FAR and DFARS interim rules address contractor responsibilities for training employees on TIP, and monitoring the conduct of their employees to ensure compliance. Both rules also address the requirement for the contractor to include the substance of the TIP clause in subcontracts. **Status: Ongoing** – The DFARS interim rule is at OMB for final clearance and is scheduled for release by September 2006.

❖ **MEJA:** While DoD civilian and civilian contract employees are not subject to the UCMJ, they do come under the “Military Extraterritorial Jurisdiction Act” – MEJA. Also, the FY 05 Defense Authorization Act has expanded MEJA to include civilians working under other federal agency’s contracts that support DOD operations. **Status: Complete** - On March 3, 2005, the DepSecDef approved and signed the proposed DoD Instruction (regulation) implementing the Military Extraterritorial Jurisdiction Act. The new instruction is available on the DOD website <http://www.dtic.mil/whs/directives/> as DoD Instruction 5525.11, “Criminal Jurisdiction Over Civilians Employed By or Accompanying the Armed Forces Outside the United States, Certain Service Members, and Former Service Members.”

❖ **LEGAL PROHIBITION ON PROSTITUTION:** On September 15, 2004 the Department of Defense entered a recommended amendment to the Manual for Court’s Martial (MCM), “Patronizing a Prostitute.” **Status: Complete** - On October 14, 2005, President Bush signed E.O. 13387 “2005 Amendments to the Manual for Courts-Martial,

United States" that enumerates the Article 134, UCMJ, offense of "Patronizing a Prostitute".

❖ **EVALUATING ANTI-TIP EFFORTS:** DoD Inspector General's office announced a DoD wide evaluation of the TIP program (starting Nov 05 ending by August 06). The IG will assess whether programs are in place as well as to determine if those programs in effect (such as Korea) has made some impact on combating trafficking. The purpose of the evaluation is to also ensure that Services and Combatant Commands comply with new DoD anti-TIP programs and efforts:

- Orientation programs; ensuring they contain a TIP component
- Leadership Involvement
- Law enforcement efforts to combat TIP
- Whether periodic, internal checks are conducted

The IG will also look at best practices and share those with others that have less effective programs.

❖ **Trafficking Victims Protection Reauthorization Act of 2005:**

The 2005 TVPRA directs DoD to incorporate anti-trafficking and protection measures for vulnerable populations into post conflict and humanitarian emergency assistance and program activities. It also directs Sec State and the Administrator, USAID, in consultation with SecDef, to conduct a study regarding the threat and practice of trafficking in persons generated by post conflict and humanitarian emergencies in foreign countries. OASD SO/LIC, Stability Operations lead.

❖ **Out Reach:**

DoD continues to participate in Governmental and Non Governmental conferences, panels and seminars involving TIP:

- FBI National Academy - TIP Investigation/Case Management Training
- Columbus Law School, Catholic American University – Govt/NGO Trafficking Panel
- European Command – Chaplains Conference
- NATO/EAPC, Helsinki – Best practices Conference
- Marshall Center – TIP and National Security Conference
- DoJ/Bureau of Justice Assistance – Law Enforcement TIP Awareness Training
- University at Albany, SUNY – Washington Semester TIP Seminar
- US Conf of Catholic Bishops, Catholic Organizations against trafficking
- US Southern Command Joint Interagency Coordinating Group
- GWU Law School – Govt/NGO Trafficking Panel
- DOS Foreign Embassy Briefing Conference
- DOS Foreign Exchange Program Briefings (Ongoing, periodic)
- NATO Officers Orientation Course, NDU (Ongoing, periodic)

John F. Awtrey/OSD(P&R)PI-LEPS 28 AUG 06

Appendix F – Multi-National Force—Iraq (MNF-I) and Coalition Forces Land Component Command (CFLCC) TIP Initiatives



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
COALITION FORCES LAND COMPONENT COMMAND
UNITED STATES ARMY CENTRAL COMMAND
THIRD UNITED STATES ARMY
APO AE 09306

August 30, 2004

Office of the Deputy Commanding General

Matthew H. Tueller
Charge' d'Affaires
Embassy of the United States of America
Kuwait, State of Kuwait

Dear Mr. Tueller:

As you know, our staff has worked diligently to address each of the concerns raised by the Indian Government during the 28 May 2004 meeting at the Indian Embassy (see enclosure). Subsequent coordination with our contractors achieved a mutual understanding as to both their responsibilities and ours with respect to Indian and all foreign national drivers that must travel from Kuwait to Iraq under a U.S. Government contract.

Consequently, we have taken the following actions to address those issues and concerns:

- a. Incorporated Private Sector Labor Laws of the State of Kuwait into contract, and extend applicability to cover employees while in Iraq.
- b. In accordance with those laws, required contractors to incorporate use of employment contracts with every employee.
- c. Required contractors maintain and update a list of driver employees to include name, nationality, passport number, civil ID #, and name of sponsor; to be provided to the respective embassy of each nationality employed.
- d. Included same information (as noted paragraph c. above) along with contract number and telephone numbers for the contractor and contracting officer on a company identification badge for each employee.
- e. Required that contractors incorporate life insurance for workers in Iraq in the amount of 10,000 KWD minimum, payable to an individual designated by employee.
- f. Required that contractors pay a minimum monthly wage in the amount of 140 KWD, and make electronic funds transfer of wages available to each employee.
- g. Required minimum incentive pay in the amount of 5% of monthly wage for any month that includes a mission into Iraq.

h. Required contractors to provide information on employees that are killed in action (KIA), wounded in action (WIA), or missing in action (MIA) to the Contracting Officer, the respective embassy and the next of kin.

i. Ensured that contractors developed some package of compensation for workers already killed or injured in Iraq.

j. Ensured that contractors adhere to basic standards of billeting and hygiene in worker housing.

Please convey to the Indian Ambassador our pledge to continue to address his concerns, which are also our concerns. Furthermore, we will continue to work with all parties involved to ensure that all countries' foreign national employees working for our contractors are provided for with no less than the agreed upon benefits and rights.

Sincerely,



Gary D. Speer
Major General, US Army
Deputy Commanding General

Enclosure



JOINT CONTRACTING COMMAND-IRAQ/AFGHANISTAN
PARC-FORCES
BAGHDAD, IRAQ
APO AE 09342



PARC-FORCES

19 April 2006

MEMORANDUM FOR ALL CONTRACTORS

SUBJECT: Withholding of Passports, Trafficking in Persons

Evidence indicates a wide spread practice of holding and withholding employee passports to, among other things, prevent employees "jumping" to other employers. It is the position of Multi-National Forces-Iraq (MNF-I) that this practice violates Title 18, U.S.C., Sections 1589 and 1592.

All contractors, engaging in the above mentioned practice and having contracts awarded by the Joint Contracting Command-Iraq/Afghanistan, are directed to cease and desist in this practice immediately. **All passports will be returned to employees by 1 May 06.** This requirement will be flowed down to each of your subcontractors performing work in this theater. The MNF-I Inspector General will conduct compliance inspections in 90 days.

If it becomes any company's decision to disregard this direction be advised I will take whatever steps necessary, within my authority, to compel compliance including contract termination, debarment, suspension or negative past performance evaluations. Further, installation law enforcement and garrison leadership may bar access to any government installation for illegal activity.


The following will appear in future solicitations and contracts:

- A "termination without penalty" provision in accordance with Title 22 U.S.C., Section 7104.g
- Requirement for contractors and sub-contractors at all tiers to provide workers with a signed copy of their employment contract that defines the terms of their employment/compensation (e.g., salary, currency, work hours, overtime, vacation, etc.)
- Prohibition for contractors and subcontractors at all tiers against utilizing unlicensed recruiting firms, or firms that charge illegal recruiting fees
- Establishment of 50 feet as the minimum acceptable square footage of personal living space per worker

- Requirement for contractors and subcontractors at all tiers to comply with international and host country laws regarding transit/exit/entry procedures, and the requirements for work visas

The right of freedom of movement and quality living standards are serious issues; MNF-I takes a zero tolerance approach to any violation.

Reminder: All passports returned to safekeeping of each employee not-later than 1 May 06.



ROBERT K. BOYLES, Colonel, USAF
Principal Assistant Responsible for
Contracting – Forces
Joint Contracting Command – Iraq/Afghanistan

MEMORANDUM

TO: KBR Project Managers, Deputy Project Managers and Operations
Managers ME / CA

FROM: Paul Wilkinson – Training Center Manager, Theater Training Center

RE: Trafficking in Persons Awareness Training

DATE: 13 April 2006

ALCON

As a consequence of *MNF-I FRAGO 06-188 Trafficking in Persons*, there is a requirement for all KBR theater personnel to undergo "Trafficking in Persons Awareness Training." The deadline for this training to occur is 1 May 2006 to be in compliance.

To facilitate this task, a power point brief has been prepared and is located on the public drive. Also attached for reference is the FRAGO 06-188 which requires the training, and a student sign in sheet to confirm staff attendance at the training. How you disseminate this information to your personnel is at your discretion so long as the sign in sheet is signed and returned as follows:

The sign in sheet needs to be scanned and returned to mail box **FDXBKBR - LOGCAP III HQ ME/CA** by COB 5 May 2006.

Please note that **the training is for awareness purposes only**, it is not mastery type training where assessments would be involved. However, for those staff interested in further information about this phenomenon, there is information on the last briefing slide referring people to an on-line course which is available.

I will act as POC for any queries on this training requirement.

Thank You

Paul Wilkinson

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Appendix G – Web-Based Survey Questionnaires

TRAFFICKING IN PERSONS (TIP) SURVEY

Your Concerns About the Survey

Will my survey responses be kept anonymous? Yes. The sole purpose of this survey is to gauge the awareness of TIP and to determine if there is possible TIP involvement or incidents related to TIP in this region.

Privacy Notice

Authority: This questionnaire is being conducted by the DoD Inspector General under authority of National Security Presidential Directive -22 on Combating Trafficking in Persons and Public Law 108-193 Trafficking Victims Reauthorization Act of 2003

Principal Purpose: Information collected will be used to evaluate TIP awareness and possible involvement. This information may assist in the formulation of policies to improve Education/awareness of TIP.

Routine Uses: None.

Disclosure: Providing information on this survey is voluntary. There is no penalty if you choose not to respond. However, maximum participation is encouraged. No identifying information is being collected that could identify individuals. Only summary information will be reported.

Completing the Survey

- • This is not a test.
- • Select answers that you believe are most appropriate.
- • Complete all questions.

Different Terms Associated with TIP:

- **Sex trafficking:** Recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a sex act
- **Commercial sex act:** Any sex act that entails something of value being given or received by any person
- **Involuntary servitude:** Condition of servitude induced by means of any scheme, plan, or pattern intended to cause a Person to believe that, if the person did not enter into and continue servitude, he or she would suffer serious harm
- **Debt bondage:** Condition of a debtor arising from a pledge by the debtor of his or her personal services, or those of a person under his or her control, as a security for debt
- **Coercion:** Threat to cause a person to believe that failure to perform an act would result in physical harm

Questionnaire

1. Status:

DOD Civilian USG Civilian US Contractor US Military Other

2. If military, check Service:

Army Navy Marines Air Force Coast Guard

3. Grade

Military: E-1 to E-4 E-5 to E-9 W1 – W5 O-1 to O-3

O-4 to O-6 Flag Officer

Civilian: GS-1 to GS-6 GS-7 to GS-10 GS-11-GS-13 GS-14 and
15

WG 1-8 WG 9-11 WG 12-15 SES Other

4. Gender: Male Female

5. Have you received information on the US Government policy regarding
Trafficking in Persons?

Yes No I don't know

6. If yes, please check the source of your information?

Pre-Assignment Brief Supervisor TV Newspaper Other

If other, please explain

7. If information was presented, was it easy to understand?

Yes No I don't know

8. Can you recognize signs or indicators of TIP?

Yes No I don't know

9. Were you aware of TIP prior to this assignment?

Yes No I don't know

10. If yes, what was the source of your information?

Previous assignment Media other please explain

11. Are you aware of US personnel involvement in activities that could be defined as TIP?

Yes No I don't know If yes, please explain.

12. Are you aware of any possible condition of involuntary servitude, debt bondage, or coercion occurring through US contracted labor?

Yes No I don't know

13. Are you familiar with the procedures for reporting suspected traffickers?

Yes No I don't know

14. Is prostitution illegal in the region you are assigned to?

Yes No I don't know

15. Have you heard of any incident where US personnel (civilian or military) had been approached by a prostitute/pimp soliciting for sex?

Yes No I don't know

16. If yes was it reported? Yes No In don't know

17. If reported to whom?

Chain of Command Local Police Military Police/CID

Embassy Other

18. Are you aware of the "off limits" establishments for US personnel?

Yes No I don't know

19. Do you know of any establishment that should be off limits due to commercial sexual exploitation, often is linked with TIP?

Yes No I don't know

20. If yes, which one(s) and why?

21. Do you have any suggestions for improving the TIP program in your area?

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Appendix H – Web-Based Survey Results—10,331 Participants

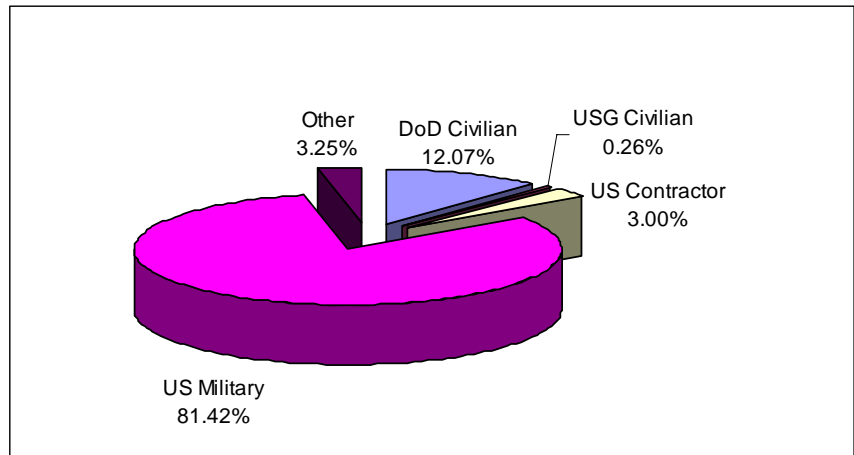
Evaluation of DoD Efforts to Combat TIP

Project No. D2006-DIPOE1-0052.00

May 01, 2006 Web-Based Survey

Q1. What is your status within the Department of Defense?

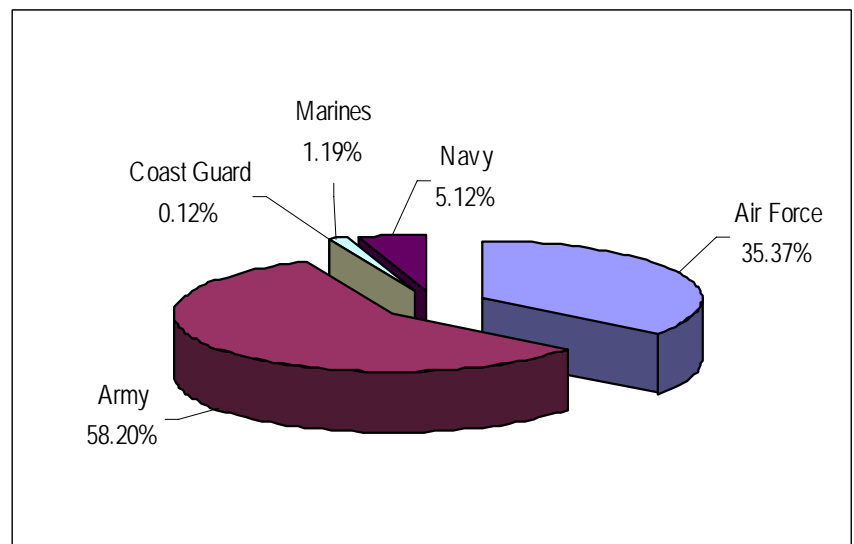
DoD Civilian	1,247
USG* Civilian	27
US Contractor	310
US Military	8,411
Other	336



* Government civilian, other than DoD

Q2. If military, check service. (Subset of Q1—total 8411.)

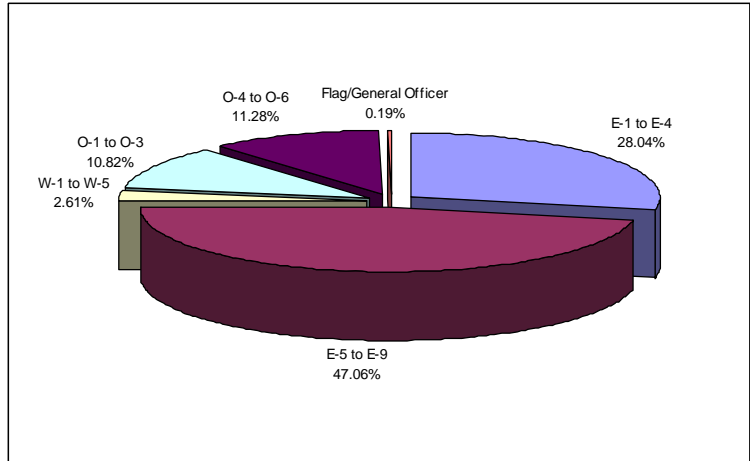
Army	4,895
Navy	431
Marines	100
Air Force	2,975
Coast Guard	10



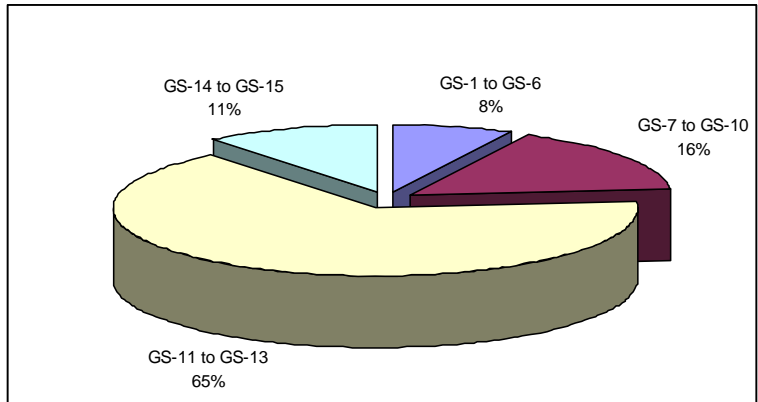
Q3. What is your pay grade? (Subsets of Q1.)

E-1 to E-4	2,418
E-5 to E-9	4,058
W*-1 to W-5	225
O-1 to O-3	933
O-4 to O-6	973
Flag/General Officer	16

* Warrant Officer

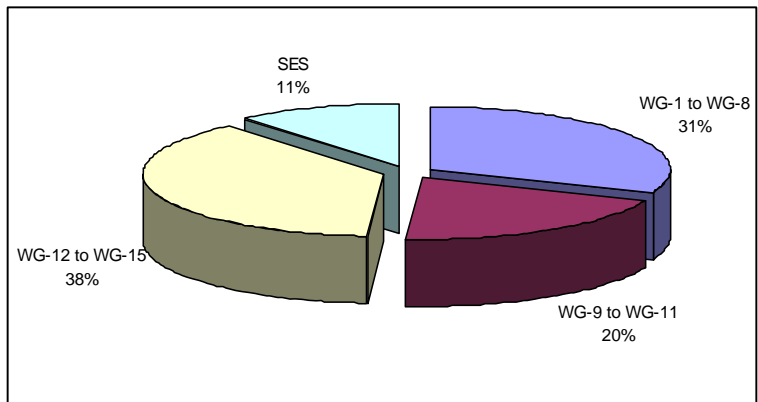


GS-1 to GS-6	92
GS-7 to GS-10	197
GS-11 to GS-13	796
GS-14 to GS-15	133



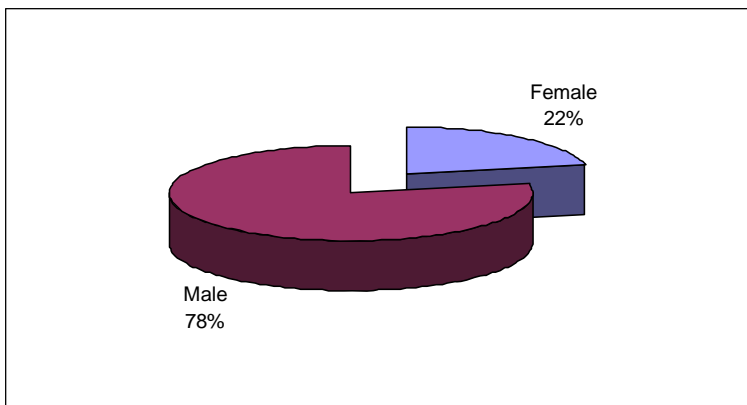
WG*-1 to WG-8	14
WG-9 to WG-11	9
WG-12 to WG-15	17
SES	5

* Wage Grade
+ Senior Executive Service



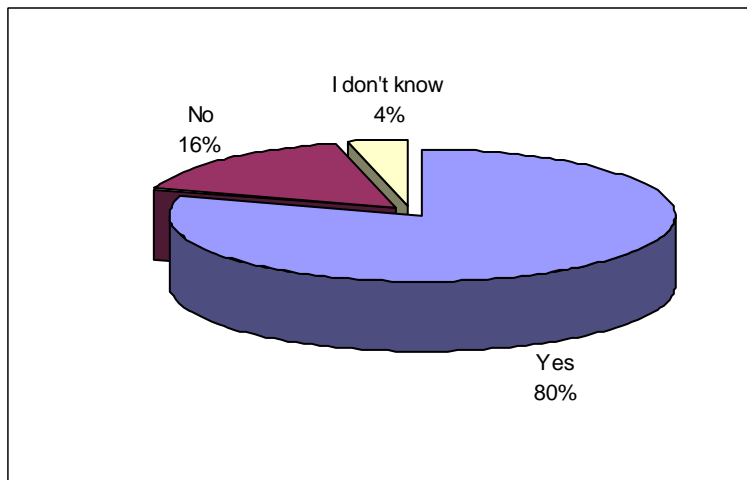
Q4. What is your gender? (Subset of Q1.)

Female 2250
 Male 8031



Q5. Have you received information on the US Government policy regarding Trafficking in Persons?

Yes 8215
 No 1675
 I don't know 404

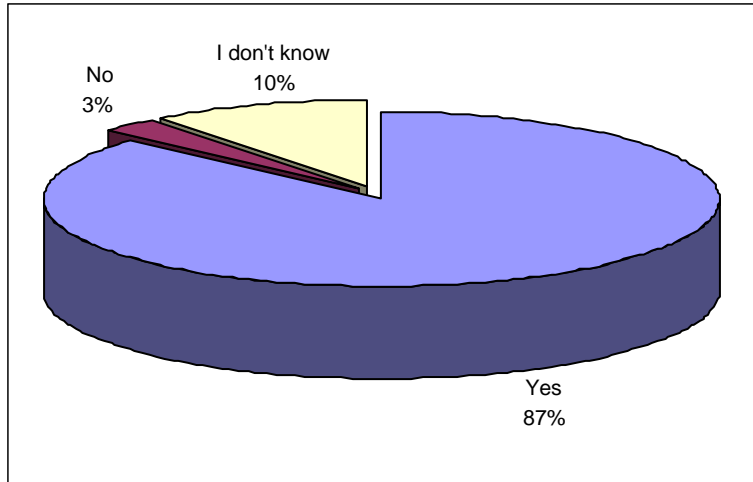


Q6. If yes, what was the source of your information?

- | | |
|---------------------------------|-------------------------|
| In processing Brief | Arrival Brief |
| Base Brief | Bill Boards |
| Pre-deployment Brief | New Horizons Brief |
| Armed Forces Network Radio Adds | Computer Based Training |
| Chain of Command | Policy Letters |
| Class on Human Trafficking | Pamphlets |
| Commanders Call | Co-workers |
| Navy Knowledge on Line | E-mail |
| DoD IG Web-based Survey | Equal Opportunity Class |
| General Military Training | Internet |

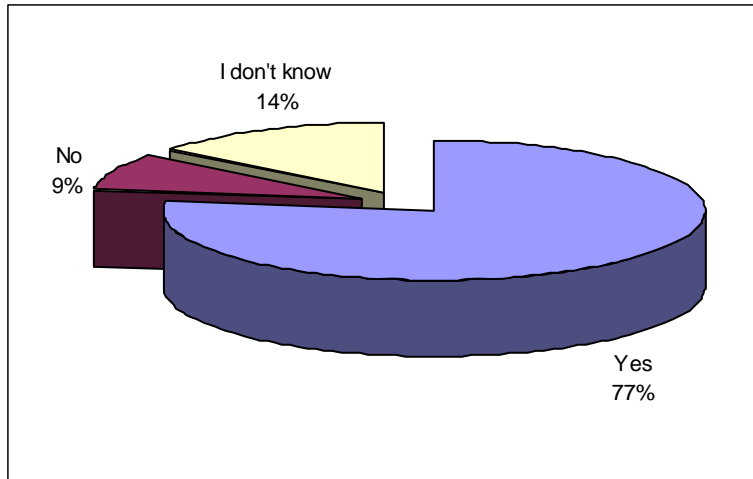
Q7. Was the information easy to understand? ? (Subset of Q5.)

Yes	8,047
No	261
I don't know	982



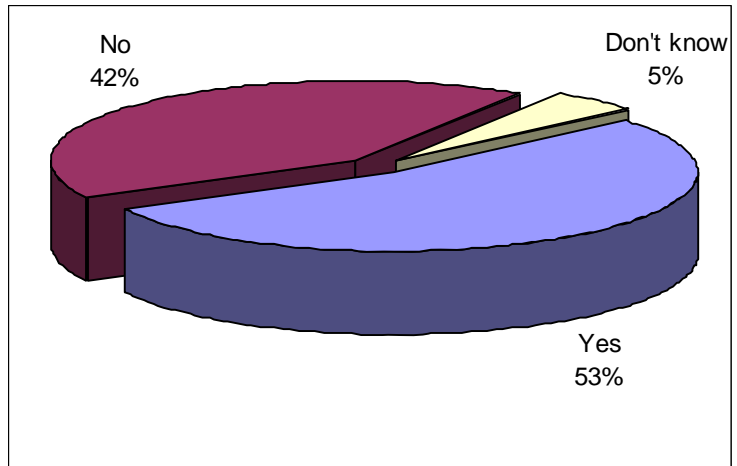
Q8. Can you recognize signs or indicators of TIP?

Yes	7,750
No	878
I don't know	1,449



Q9. Were you aware of TIP prior to this assignment?

Yes	7,750
No	4,284
I don't know	495

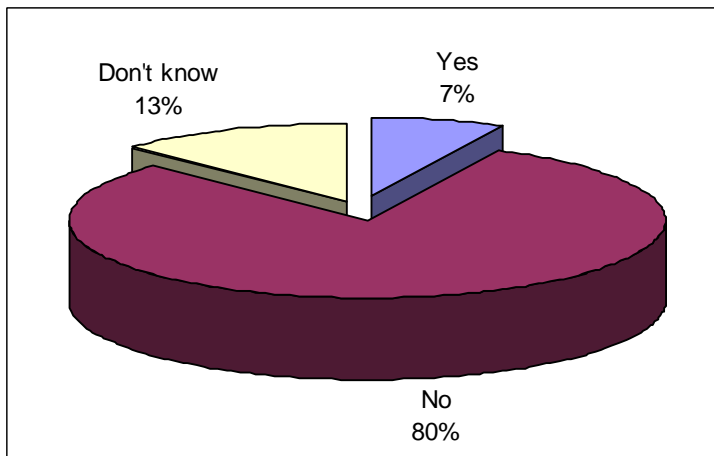


Q10. What was the source of your information?

- | | |
|---------------------------------|-------------------------|
| In processing Brief | Arrival Brief |
| Base Brief | Bill Boards |
| Pre-deployment Brief | New Horizons Brief |
| Armed Forces Network Radio Adds | Computer Based Training |
| Chain of Command | Policy Letters |
| Class on Human Trafficking | Pamphlets |
| Commanders Call | Co-workers |
| Navy Knowledge on Line | E-mail |
| DoD IG Web-based Survey | Equal Opportunity Class |
| General Military Training | Internet |

Q11. Are you aware of US personnel involvement in activities that could be defined as TIP?

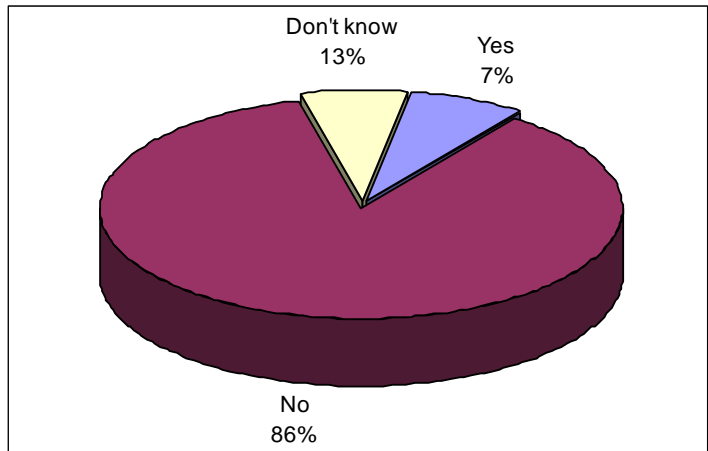
Yes	732*
No	7,956
Don't know	1,269



* Likely the result of equating all prostitution as TIP. The team did not identify any involvement of U.S. personnel in actual trafficking.

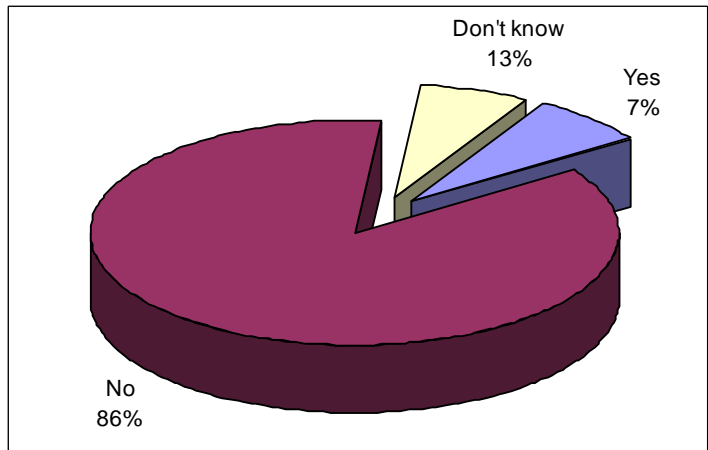
Q12. Are you aware of any possible condition of involuntary servitude, debt bondage, or coercion occurring through US contracted labor?

Yes 732
 No 8,756
 Don't know 689



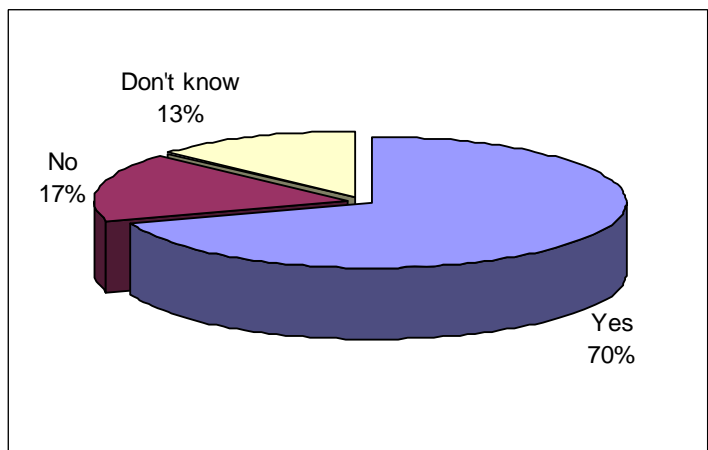
Q13. Are you familiar with the procedures for reporting suspected traffickers?

Yes 732
 No 8,756
 Don't know 689



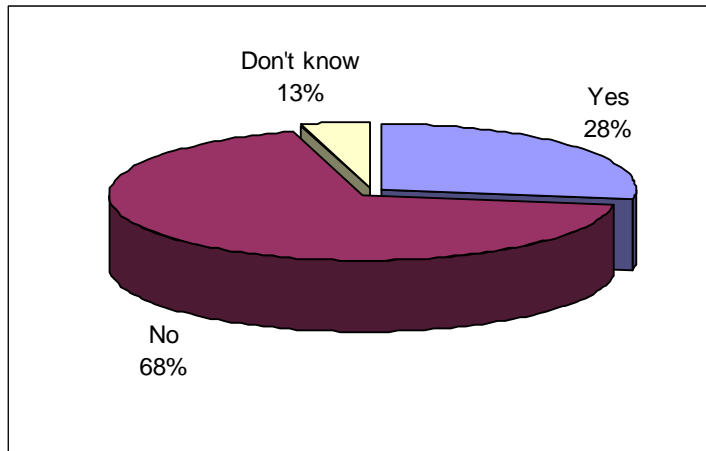
Q14. Is prostitution illegal in the region you are assigned to?

Yes 7,153
 No 1,713
 Don't know 1,358



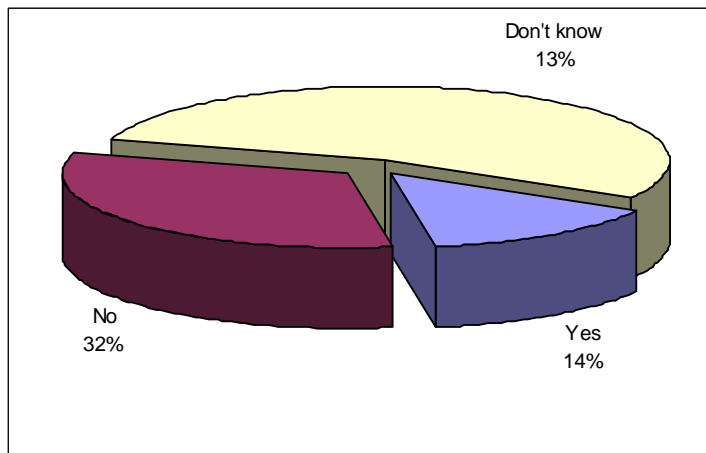
Q15. Have you heard of any incident where U.S. personnel (civilian or military) had been approached by a prostitute/pimp soliciting for sex?

Yes	2,817
No	6,948
Don't know	458



Q16. If yes, was it reported? (Subset of Q15.)

Yes	811
No	1,802
Don't know	3,062



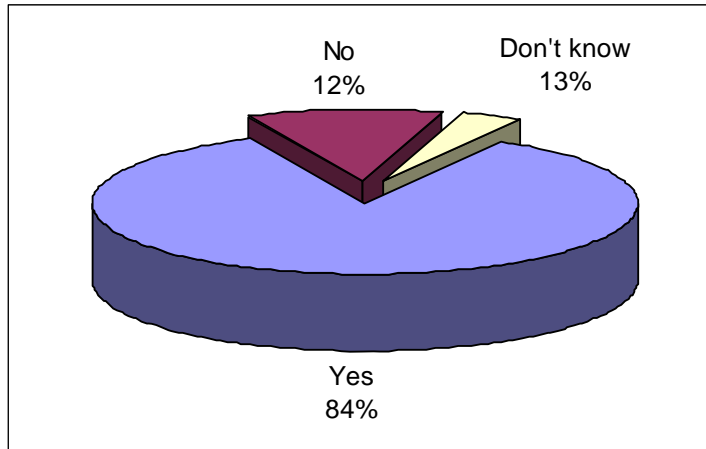
Q17. If reported, to whom? (Predominant answers)

Chain of Command
Criminal Investigation Division

Military Police
Local Police

Q18. Are you aware of “off-limits” establishments for US personnel?

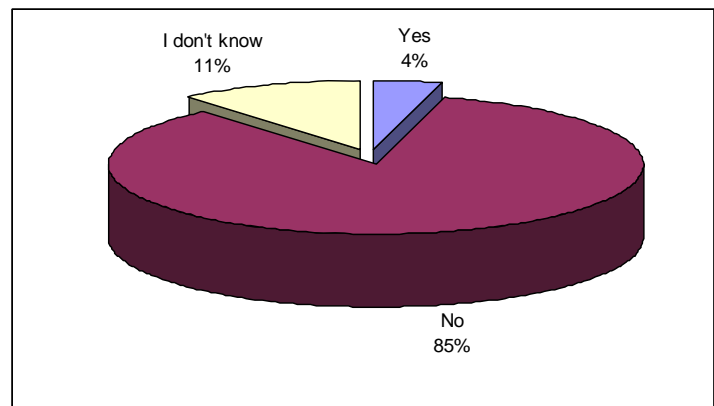
Yes	8,595
No	1,193
Don't know	364



Q19. Do you know of any establishment that should be off limits due to commercial sexual exploitation linked to TIP?

Yes	438*
No	8,601
I don't know	1,145

* Likely linked to presence of prostitutes. No determination of a link to actual trafficking.



Q20. If yes, which one(s) and why?

No establishments reported as having a definitive link to trafficking. Those establishments reported were for alleged prostitution on the premises.

Q21 . Do you have any suggestions for improving the TIP program in your area?

- Present real life situations where members have been caught via message traffic. This info can be used to inform and train personnel on the sign and activities of the program and situations in which it is taking place.
- Off limits locations and areas are very difficult to understand -- recommend that off limit areas be published in a user-friendly, printable map -- off-limit locations could also be identified by name and location on the same map.
- Only target actual trafficking, not legal establishments that is licensed and regulated by the host nation government. Trying to prosecute soldiers for patronizing legitimate businesses is ridiculous and counterproductive. The only places that should be off-limits should be places where actual crimes are taking place and the soldiers' health is in danger.
- Personify the problem: have individuals that have been exploited by this give live testimony of their circumstance so soldiers will see these women as people!!!
- Provide statistics and evidence of the extent of any U.S. personnel soliciting or involved in involuntary servitude, debt bondage, or coercion in this area.
- Reduce demand by providing legitimate social opportunities for military members. In the past, local universities and other legitimate social groups would often sponsor groups of young single people to go to military bases for Friday, weekend, or other scheduled events. This provides a safe, legitimate environment for social interaction, which would reduce demand for activities contributing to TIP.
- Continue to educate our soldiers and I suggest perhaps getting more involved with the rehabilitation process for young women who have been caught up in this type of lifestyle. If there were a program to help mentor these young women, I would certainly volunteer my time and help them learn a skill, enhance their self esteem.
- Education is the key. More classes with real examples that have high percentage of happening around the area.

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Appendix I – Onsite Sensing Sessions Results

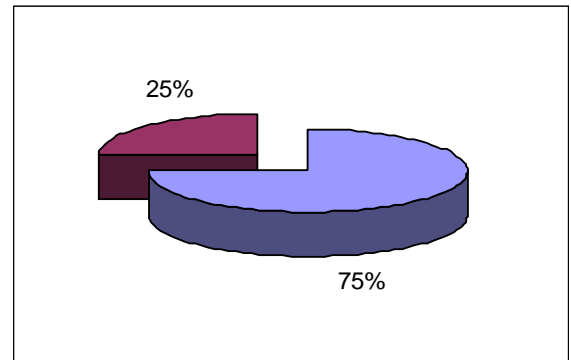
(848 Participants)

Evaluation of DOD TIP Efforts to Combat TIP

Project No. D2006-DIPOE1-0052.00

Q1. Have you received information on the US Government policy regarding TIP?

Yes 635
No 213

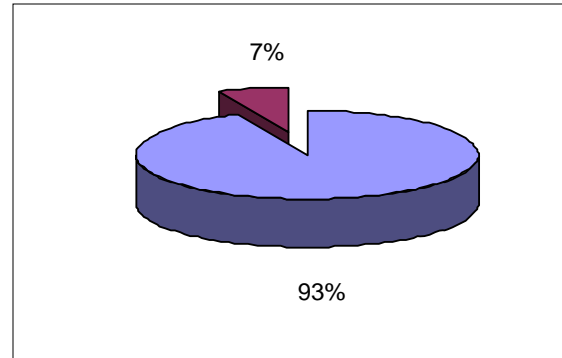


Q2. For those who answer yes - what was the source of your information?

- Air Force Office of Special Investigations officers.
- All Navy messages directing all sailors to complete DoD TIP training module on Navy Knowledge on-line.
- Battalion training
- Cobra Gold exercise in-brief.
- Command training briefs
- DoD training module
- DoD IG developed poster.
- E-mail
- Indoctrination briefing
- Leadership, Supervisors, and Commanders Call prior to liberty.
- LifeTime television show about human trafficking.
- Local Navy Criminal Investigation Service briefing prior to ship's port visit.
- Marine Corps message traffic.
- National DoD publication.
- Navy Knowledge On-line (NKO) training module.
- New Horizons Class (USFK)
- Off-limits establishment postings
- Radio commercials.
- Temporary duty to USFK.
- TIP awareness posters.
- Weekly briefs from the Command Sergeant Major/Commanding General.
- TIP articles in base news paper and *Stars and Stripes*.

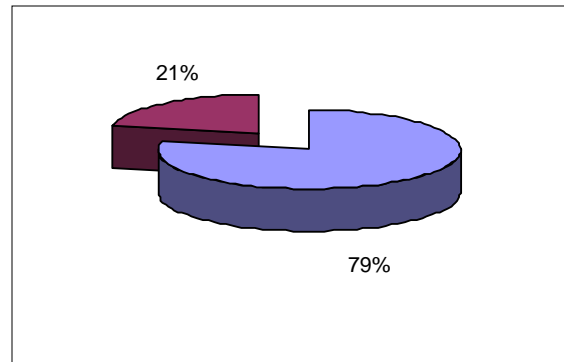
Q3. Was the information presented easy to understand? (Subset of Q1.)

Yes 592
No 43



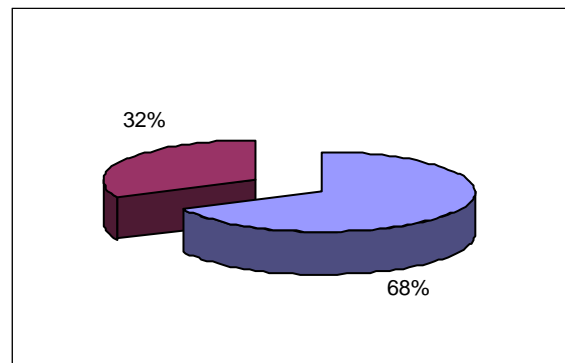
Q4. Could you recognize signs or indicators of TIP?

Yes 667
No 181



Q5. Were you aware of TIP prior to this assignment?

Yes 579
No 269

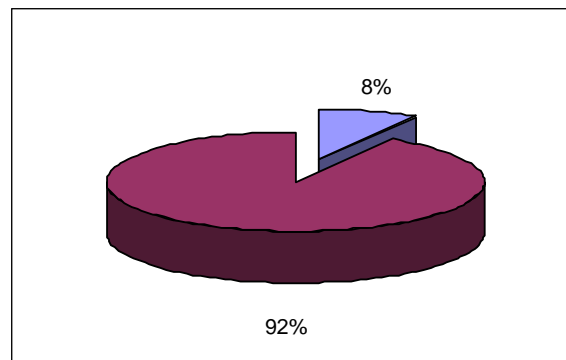


Q6. If yes to question 5, what was the source of the information?

- Base Paper
- Commander briefing.
- Deployment to Taegu, South Korea (USFK)
- E-mail received referring to the on-line TIP awareness survey
- Formal education
- In-country brief while TDY to USFK
- Media (60 minutes and another story about boys being trafficked to cater to men)(Internet and television) (documentaries)
- National DoD publication.
- Navy Times articles
- Personal experience (a SS member felt that they saw indicators with a girl who they were engaged in discussion with in Thailand)
- Personal travels/previous assignment (Balkans)
- Pervious commander was assigned to USFK in South, Korea.
- PowerPoint presentation on TIP while in South Korea assigned to USFK.
- Previous assignment (While stationed in Panama. Women in prostitution bars working off of contracts. The local stories indicated that perhaps these girls were sold by their families.)
- Spouse of Columbian lineage said that in Columbia guys in cities would approach females and ask if they want to get an education in the states – whatever college they wanted. It was later discovered the women were actually being recruited by traffickers.
- Stories from Marines/personal experience
- TIP awareness posters.
- Training (in a drug traffic awareness training course)
- Training received on Navy Knowledge On-line (NKO) training module.
- Word of mouth (Stories about people selling their sons and daughter to traffickers)

Q7. Are you aware of US personnel involvement in activities that could be defined as TIP?

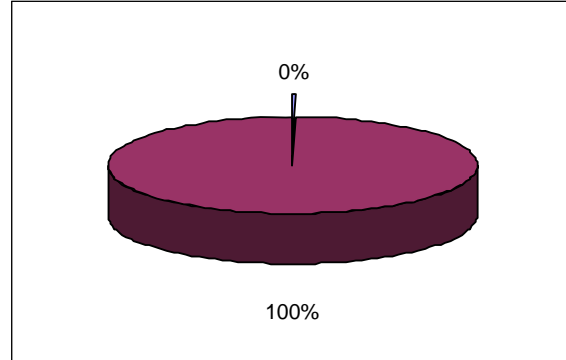
Yes 72*
 No 776



* The result of equating the perceived presence of prostitutes or “Juicy Girls” as TIP. In each instance, further questioning did not identify any involvement of DoD-affiliated personnel in actual trafficking.

Q8. Are you aware of involuntary servitude, debt bondage occurring through US contracted labor?

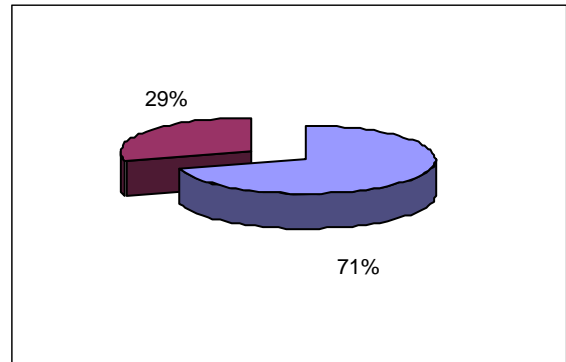
Yes 2*
No 846



*The two respondents who answered “Yes” suspected individual cases of involuntary servitude involving foreign subcontractors in Iraq and Kuwait. (See Chapter 7)

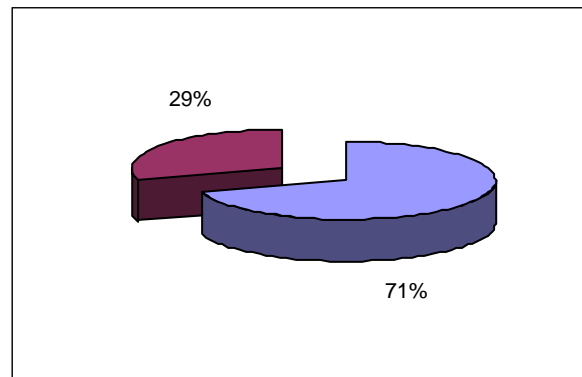
Q9. Are you familiar with the procedures for reporting suspected traffickers?

Yes 598
No 250



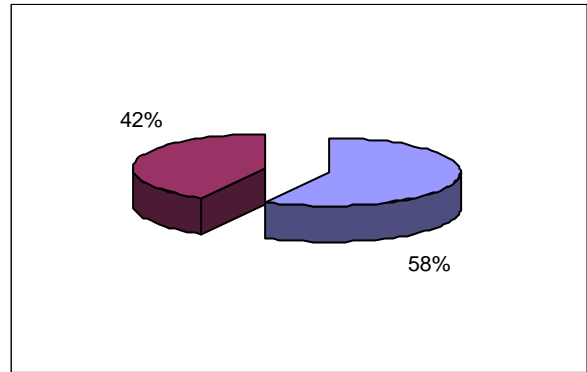
Q10. Is prostitution illegal in AOR?

Yes 598
No 250



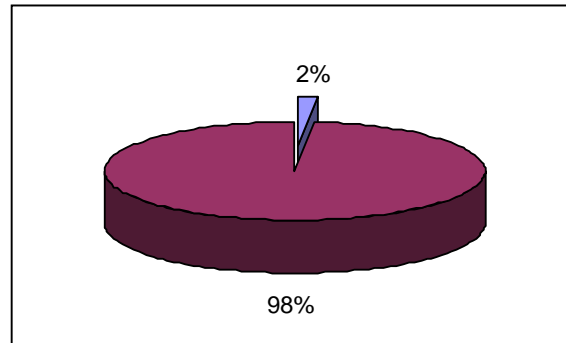
Q11. Are you aware of incidents where US personnel approached by a prostitute/pimp soliciting for sex?

Yes 493
No 355



Q12. If yes, was it reported? (Subset of Q11.)

Yes 13
No 835

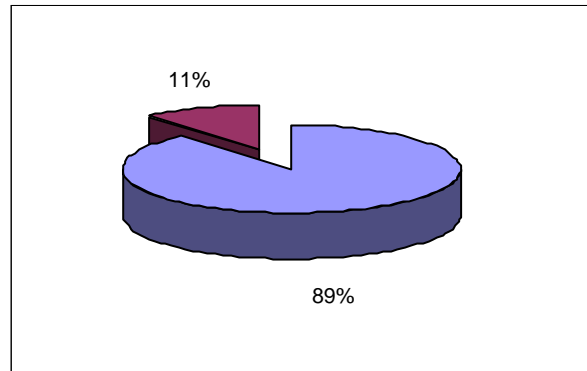


Q13. If yes, to whom?

- Chain of command
 - Security
 - Army Criminal Investigation Division
 - Navy Criminal Investigation Service
-
-

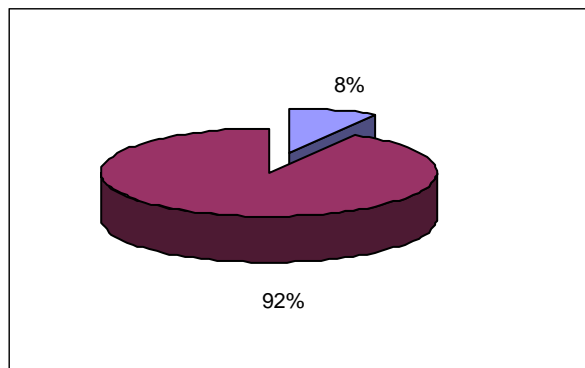
Q14. Are you aware of the "off limits" establishments for US personnel?

Yes 751
No 97



Q15. Are you aware of any establishments that should be off limits, but are not?

Yes 72
No 776



Q16. If yes, which one (s) and why?

Base commanders and their Disciplinary Review Boards consider each questionable establishment, in accordance with established procedures, before placing that establishment “off-limits.” Recommendations gathered in the sensing session were passed onto the base Inspector General for review.

Q17. Do you have any suggestions for improving the TIP program in your area?

- A victim speaking tour would be very effective in training.
- Be sure to emphasize why this training needs to be done.
- Clarify reporting procedures (needs to be anonymous)
- Communicate, educate and hold personnel accountable
- Educate all levels of the military service
- Emphasis needs to be government to government vice focusing on DoD.
- Increase funding for investigators and increase resources.
- Increase resources for Morale, Welfare, and Recreation funding.
- Stopping trafficking is hard; eliminating prostitution is impossible.
- Military should work with local police
- One member asked what the Air Force Office of Special Investigations was doing about the issue.
- One member had come from Fort Bragg and said there were multiple establishments that he suspected were bars that catered to prostitution 1 mile outside the gate.
- On-line training is OK, but there were multiple problems with access and printing of training certificate.
- Punishment needs to be consistent among commands and services
- Raise awareness through more training.
- Bigger than the military/DoD--needs to be pushed to a higher level (politically).
- State Department needs to pressure local government and local community to effectively combat human trafficking.

- Establish a “hotline” to report suspected human trafficking, similar to the DoD IG Hotline for fraud, waste and abuse.
- Cover TIP during the in-brief for Service Members and new employees.
- Training needs to be a part of pre-deployment briefs.
- Training needs to be part of “new comer’s briefings.”
- Training needs to go beyond Navy Knowledge Online.

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Appendix J – Department of Defense & Joint Staff Comments



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

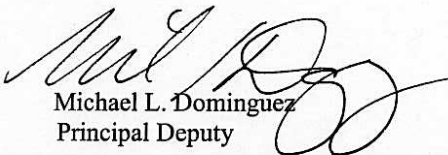
OCT - 4 2006



MEMORANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE

SUBJECT: Report on the Evaluation of the Department of Defense (DoD) Efforts to
Combat Trafficking in Persons (TIP) (Project No. D2006-DIP0E1-0052.000)

This office has reviewed the draft report and concurs with comment. Comments are attached, keyed to the executive summary recommendations for which OUSD (P&R) is the office of primary responsibility. My point of contact for this action is Mr. John Awtrey, 703 696-0846, john.awtrey@osd.pentagon.mil.


Michael L. Dominguez
Principal Deputy

Attachment:
As stated



Attachment to the OUSD (P&R) response to Draft Report on the Evaluation of the Department of Defense (DoD) Efforts to Combat Trafficking in Persons (TIP) (Project No. D2006-DIP0E1-0052.000)

Recommendations: OUSD (P&R) OPR

1) Complete and publish the DoD Directive and/or implementing instructions for the TIP program that assigns clear roles and responsibilities. (OPR: USD [P & R], OCR: COCOMs, Military Services)

Concur. We expect to publish DoDD 2220.aa, Combating Trafficking in Persons by the end of October, 2006.

2) Establish and document a requirement for a periodic OSD TIP Coordinating Council meeting to review issues and to integrate DoD TIP program improvements. USD (P & R) should consider including the Services' TIP POCs. (OPR: USD [P&R])

Concur with comment. OUSD (P&R) will evaluate the requirement for an OSD TIP Coordinating Council and, if justifiable, establish one.

3) Include TIP training in the Joint and Service institutional training curricula, at all levels, for both officers and enlisted service members. (OPR: USD [P & R], OCR: Director, Joint Staff, Military Services)

Concur with comment. OUSD (P&R) will examine appropriate institutional training for inclusion of TIP training. The examination will take in to account the current institutional training loads and priority of subjects being taught, and a balance between the current distributed awareness training and the need for formal TIP training in the institutional training base.

4) Include TIP-related considerations when developing plans to establish new OCONUS bases, e.g., anti-TIP language in DoD contracts and pre-deployment TIP training requirements for service members and contractors. (OPR: USD [P & R], OCR: Regional COCOMs, Military Services)

Concur with comment. OUSD (P&R) will examine inclusion of TIP considerations into the development of plans for establishing new OCONUS bases. Pre-deployment TIP awareness training is already mandated by DoD policy. The DFAR TIP Rule will be published in mid October 2006, covering contracts and contractors involved in supporting DoD in OCONUS base establishment.

5) Develop TIP training modules that are based on realistic, military-related TIP scenarios. (OPR: USD [P & R], OCR: Military Services)

Concur with comment. OUSD (P&R) will institute a review process to make TIP awareness training as relevant as possible to today's military members.

7) Include TIP training and planning as a part of the U.S. Army's Peacekeeping and Stability Operations Institute's (PKSOI) mission. (OPR: USD [P & R], OCR: Army)

Concur with comment. OUSD (P&R) will work with the Army to examine both means and methods of including TIP training and planning in the PKSOI curriculum.

9) Establish a metric to track TIP awareness training and understanding of TIP related policy and programs. This metric should track the total number of DoD personnel assigned and total number trained, broke out by military, DoD civilians, and DoD contractors. (OPR: USD [P & R], OCR: Military Services)

Concur with comment. OUSD (P&R) will investigate implementing metrics in the distributed TIP awareness training.

Note: OUSD (P&R) has created a position for a DoD CTIP program manager. It is anticipated that this position will be filled by the end of calendar year 2006. Once this position is filled, plans and timelines will be developed for addressing the evaluation and implementation of the above recommendations.



THE JOINT STAFF
WASHINGTON, DC

Reply ZIP Code:
20318-0300

DJSM-1023-06
26 October 2006

MEMORANDUM FOR THE INSPECTOR GENERAL, DEPARTMENT OF
DEFENSE

Subject: Report on the Evaluation of the DOD Efforts to Combat Trafficking in
Persons (TIP)

1. Thank you for the opportunity to review the subject report.¹ We concur and provide the enclosed comments for your consideration. Regarding the specific recommendation related to the Joint Staff (Recommendation 3), we concur without comment. The US Air Force and Navy have responded directly to your organization.
2. The Joint Staff point of contact is Lieutenant Colonel David Jividen, USAF; J-5/GSP/ISL; 703-614-9134.

A handwritten signature in black ink that reads "Walter L. Sharp".

WALTER L. SHARP
Lieutenant General, USA
Director, Joint Staff

Enclosure

Reference:

- 1 DOD IG memorandum, 14 September 2006, "Report on the Evaluation of the Department of Defense (DoD) Efforts to Combat Trafficking in Persons (TIP) (Project No. D2006-DIPOE1-0052.000)"

ENCLOSURE

DEPARTMENT OF DEFENSE EFFORTS TO COMBAT TRAFFICKING IN PERSONS (TIP)

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
A	iv	Rec. 1)		Comment: Need to clarify that combatant command role will be to provide input on anti-TIP Directive and implementing instructions prepared by the Department of Defense during the review and comment stage.	Thoroughness and accuracy.	
C	iv	Rec. 1)		Comment: The Department of Defense must provide clear guidance and implementing instructions to ensure appropriate action is taken at every possible level in the Department. To ensure maximum effectiveness and resource application, it should provide specific guidance and instructions to military Services and DOD agencies in implementing this program at their levels.		
C	iv	Rec. 1)		Comment: USCENTCOM published initial TIP policy guidance to all Component and Joint Task Force Commands on 25 July 2005, stressing mandatory TIP Awareness Training and the proactive identification and appropriate action against this criminal activity. Upon promulgation and receipt of the DODI, USCENTCOM will publish additional policy guidance within 60 days.		
C	iv	Rec. 4)		Comment: USCENTCOM has provided, and its forward Components have implemented, mandated clauses into all solicitations and contracts prohibiting all contractor activities that support or promote TIP. Pre-deployment TIP training has been incorporated by the force providers.		
C	iv	Rec. 4)		Comment: Training for all deploying personnel (Service members, civilians, contractors, etc.) must be		

Enclosure

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
				a Service component responsibility, and stipulated in their respective regulations.		
A	v	Rec. 4)	1	Change to read: "...training requirements for service members, civilian employees, and contractors." Comment: Policy, program guidance, and training on TIP must rest with the Services in order to ensure all echelons are aware and can recognize TIP incidents and events. Concur also with the Status of Forces Agreement (SOFA) does not need to be revised solely to deal with "outside the gate" aspects. Good host nation relations and close law enforcement cooperation are positive highlights for commanders in the overseas areas. This law enforcement aspect is best managed through direct links with the host nation agencies. The published Deputy Commander's memorandum of 25 April 2006 addresses these points and clearly delineates USEUCOMs initial guidance and direction to its components in this regard. This memorandum will be revised once the Department of Defense publishes guidance on TIP implementation.	Thoroughness and accuracy.	
C	v	Rec. 8)		Comment: USCENTCOM has and will continue to provide expanded guidance unique to the Central Region.		
A	v	Rec. 8)	3	Change to read: "...(COCOM) and Military Service. <u>Update Direct COCOMs and Services develop theater, Service, and program-unique TIP policy guidance as required after publication...</u> " Comment: The report (pp. v and 11) recommends the Department of Defense establishing a metric to track the total number of DOD personnel assigned	For thoroughness and accuracy.	
	v	Rec. 9)				

Enclosure

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
	v	Rec. 11)		<p>and total number trained in TIP awareness. Recommend that this metric include measures of the effectiveness of the TIP program.</p> <p>Comment: The report (pp. v, 21, 24) recommends establishing memorandums of understanding (MOUs) with local law enforcement and non-governmental organizations; however, it is not clear as to what should be included. Recommend the DOD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing the MOUs, to avoid confusion and ensure timely and seamless response.</p>		
C	v	Rec. 14)		<p>Comment: Multi-National Force-Iraq (MNF-I) completed a comprehensive investigative inquiry into allegations of improper treatment of workers by contractors and subcontractors in Iraq. Over a 4-month period, the command inspected worker life support areas across Iraq and met with over 800 third country national (TCN) workers from over 20 nations, employed by over 40 contractors and subcontractors. The command published an order establishing measurable and enforceable standards, responsibilities, and a framework for the command's continuing programs to deter and combat human trafficking by DOD personnel or contractors in Iraq. MNF-I engaged base force protection, contracting officials, and contractor representatives in facilitating the return of contractor and subcontractor-held passports to hundreds of TCN workers in Iraq. They conducted regular, unannounced spot checks of</p>		

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
				<p>contractor and subcontractor worker life support areas to ensure compliance with law and command policy guidelines for workers and civilian personnel, contracting officials, and contractor representatives in addressing TIP issues. MNF-I's ongoing and planned actions include: sustained regular, unannounced spot checks of contractor and subcontractor worker life support areas to check compliance with laws and MNF-I standards defined in the operational order; formally re-inspect worker living conditions and employment practices at multiple MNF-I bases across Iraq (proposed for 4th Qtr, CY06); and re-enforce training and education of MNF-I standards and how to recognize TIP activities and reporting procedures.</p>		
				<p>Combined Forces Land Component Command (CFLCC) has published specific policy guidance to be included in all solicitations and contracts and is executing training for all contracting officials. Contractors must develop written policies to combat trafficking in persons, to include knowingly destroying, concealing, removing, confiscating, or possessing any actual or purported passport or their immigration document, to prevent or restrict, without lawful authority, [the] a person's liberty to move or travel, in order to maintain the labor or services of that person. CFLCC (IG, Joint Staff, and/or contracting team) will conduct inspections in the 1st and 3rd Quarter, FY07 as part of a comprehensive follow-up review to ensure the findings and recommendations of the DOD IG report are</p>		

Enclosure

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
A	18	4	1st blt	implemented. Change to read: "Designated a Captain (Navy O-6) Colonel (USAF O-6) as the TIP POC within the PACOM J-1 Directorate."	Correctness	
A	20	2	3	"Results" para 2 – Change to read: "...solicit pedestrians. Hawaii's <u>HGMB-K GMB 9</u> News aired..."	Correctness	
A	25	3rd bullt		Delete and replace with the following: "Mandated all new arrivals receive Prostitution and Human Trafficking (P&HT) Awareness Training. Included P&HT Awareness Training in the quarterly "New Horizon's Day" training, which is mandatory for all USFK Service members, DOD civilian employees, and invited contractors."	Completeness and accuracy.	
A	25	Add bullt		Add new bullet to read: "Established a P&HT Working Group headed by an O-7 to coordinate the command's efforts in combating P&HT."	Completeness and accuracy.	
C	28	1		Comment: Objectives: While we recognize that the stated IG Team's objective in this chapter was to determine USEUCOM's implementation of TIP training, we again reinforce the matter that training should be the Services' responsibility as stated in Chapter 2. This is also stated on page 29 of the report as one of the factors (TIP Training Responsibility). Strongly recommend that the training responsibility by the Services be clearly defined when OSD writes its TIP directive or instructions.		
C	29	3		Comment: Secretary of Defense TIP Policy Intent: DOS is TIP lead for USG. It seems that the overall DOD response to IP is disjointed when compared to the other recent initiatives, e.g., Sexual Assault		

Enclosure

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
				Prevention and Response Program. A more robust effort is now needed to tell combatant commands and Services what the TIP "campaign plan" is and how will efforts be resourced (if at all). This area should be better clarified once a DOD publication depicting roles and responsibility for combatant commands and Military Services is published. Combatant commands play a strategic role (work with host nations, agreements, etc.), while Services are trainers and keepers of standards (operational and tactical).		
C	29	3	1	Change to read: "The EUCOM's area of responsibility encompasses about fifty-ninety-two countries."	Correctness	
C	30	4		Comment: Senior Leader Involvement: We are concerned with this topic and it should be reworded and clarified. The following points should assist in this respect. (1) Article 134, UCMJ, is clear in terms of patronizing prostitution, but does not make it illegal for a person subject to the code to enter a brothel. We have seen no requirement to take it further and make "entrance into a brothel" the subject of a command policy letter. However, if prohibited activity is encountered, appropriate community and installation command level authority exists to address it. (2) Within USEUCOM, a tri-Service regulation establishes policy and directives that address commanders' responsibility and procedures for imposing off-limits sanctions on suspect		

Enclosure

TYPE	PAGE	PARA	LINE	COMMENT	RATIONALE	DECISION (A/R/M)
C	30	5		<p>establishments. This authority is placed squarely on component commanders for implementation and execution.</p> <p>Comment: Commander's Reactions: As stated above, the local enforcement and management execution in restricting establishments that may raise suspicion rests with command authority at the community/installation levels. The tri-Service regulation was published based on minimal data sources and analysis.</p> <p>Recommendations for USEUCOM: In line with our previous position and discussion, these recommendations are applicable to the Service component responsibilities in implementing TIP within respective Services. The Services specifically should be charged with the TIP awareness campaign, just as they now do an excellent approach for other critical programs (e.g., family support, readiness, safety, and other campaigns). Any future DOD publication on TIP needs to cover this aspect of program implementation. These recommendations should be revised and rewritten under the Military Services Chapter.</p>		

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Appendix K—Military Service Comments



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
MANPOWER AND RESERVE AFFAIRS
111 ARMY PENTAGON
WASHINGTON, DC 20310-0111

OCT 10 2006

SAMR-HR

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Report on the Evaluation of the Department of Defense (DoD) Efforts to
Combat Trafficking in Persons (TIP) (Project No. D2006-DIPOE1-0052.000)
— ACTION MEMORANDUM

1. Reference enclosed memorandum, September 18, 2006, subject as above.
2. The Army concurs with the following comments reference the draft report.
 - a. The report (pp. v, 21, and 24) recommends establishing memorandum of understandings (MOU) with local law enforcement and nongovernmental organizations; however, it is not clear as to what should be included. Recommend the DoD policy directive and/or implementing instructions include standardized requirements and guidelines for commanders to use when developing the MOUs, to avoid confusion and ensure timely and seamless response.
 - b. The report (pp. v and 11) recommends DoD establishing a metric to track the total number of DoD personnel assigned and total number trained in TIP awareness. Recommend that this metric include measures of the effectiveness of the TIP program.
3. Point of contact is Mrs. Sullivan; she can be reached at (703) 697-2705 or email darlene.sullivan@us.army.mil.

Enclosure

A handwritten signature in black ink, appearing to read "John P. McLaughlin III".

John P. McLaughlin III
Deputy Assistant Secretary
(Human Resources)



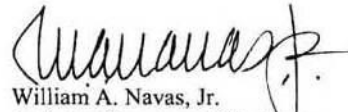
DEPARTMENT OF THE NAVY
OFFICE OF THE SECRETARY
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

OCT 27 2006

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Report on the Evaluation of the Department of Defense Efforts to Combat
Trafficking in Persons (TIP)

In response to your Memorandum dated September 14, 2006, the Department of the Navy comments are submitted at Attachment (1). A copy of the Marine Corps comments, which were submitted directly to your office on 20 October 2006, are included as Attachment (2). Both Navy and Marine Corps concur with the recommendations contained in the draft report.


William A. Navas, Jr.
Assistant Secretary of the Navy
(Manpower and Reserve Affairs)

Attachments:
As stated

**U.S NAVY RESPONSE TO DoD IG DRAFT REPORT AND
RECOMMENDATIONS ON TRAFFICKING IN PERSONS**

The Department of Defense Inspector General (DoD IG) Trafficking in Persons (TIP) draft report of September 2006 requests the Services provide comment in response to recommendations for improving DoD efforts to combat TIP. In the Executive Summary of the draft report, the Navy submits the following comments to the 14 recommendations to the DoD.

1. Concur. Navy Office of Primary Responsibility (OPR) is ASN (M&RA).
2. No comment, no action required.
3. Concur. Navy Office for Coordination Responsibility (OCR), ASN (M&RA)
4. Concur. Navy OCR is ASN (M&RA); OPNAV N1
5. Concur. Navy OCR is ASN (M&RA); OPNAV N1
6. Concur. Navy OCR is ASN (M&RA); OPNAV N1
7. No action required (Army specific)
8. Concur. Navy OPR is ASN (M&RA); OPNAV N1
9. Concur. Navy OCR is ASN (M&RA); OPNAV N1
10. Concur. Navy OPR is ASN (M&RA)
11. Concur. Navy OPR is ASN(M&RA)
12. Concur. Navy OPR is ASN (M&RA); OPNAV N1
13. Concur. Navy OPR is ASN (M&RA); OPNAV N1
14. No comment, no action required.

Attachment 1



DEPARTMENT OF THE NAVY
DEPUTY NAVAL INSPECTOR GENERAL FOR MARINE CORPS MATTERS/
INSPECTOR GENERAL OF THE MARINE CORPS
WASHINGTON, D.C. 20380-1775

IN REPLY REFER TO:
5000
IGA
20 Oct 06

From: Inspector General of the Marine Corps (IGMC)
To: Department of Defense Inspector General

Subj: REPORT ON THE EVALUATION OF THE DEPARTMENT OF DEFENSE EFFORTS
TO COMBAT TRAFFICKING IN PERSONS (TIP)
(PROJECT NO. D2006-DIPOE1-0052.000)

Ref: (a) DoDIG Memo of 14 Sep 06

Encl: (1) USMC Response to TIP Recommendations

1. The enclosure describes the Marine Corps initial response to recommendations presented in the reference.

2. The Marine Corps initial unilateral response provided in the enclosure can be summarized as in favor of all the applicable recommendations contained in the DoD TIP Report. Of the fourteen recommendations, eleven were applicable to the Marine Corps as a Military Service. These recommendations will require additional DoD policy and instruction in order for the Marine Corps to implement.

3. The Marine Corps is required to staff its response and subsequent actions with the Department of the Navy (DON); therefore, our initial response is subject to DON concurrence.

4. This office recommends that the Headquarters Marine Corps (HQMC) Plans, Policy and Operations Division (PP&O), the Marine Corps office with primary responsibility (OPR) for combating TIP, be included in the final distribution list.

5. The IGMC point of contact is LtCol W. T. Anderson at (703)614-1349, DSN 224-1349.

6. The HQMC PP&O (PSL) point of contact is LtCol J. Manson at (703) 692-4247, DSN 224-4247.

R. David Holmgren
R. DAVID HOLMGREN
Deputy

Copy To:
NAVINGEN
DC PP&O (PSL)

U.S. MARINE CORPS RESPONSE TO TIP RECOMMENDATIONS

The Department of Defense Inspector General (DoDIG) Trafficking in Persons (TIP) report of September 2006 has fourteen recommendations to improve the DoD efforts to combat TIP. This enclosure restates each recommendation and presents the Marine Corps initial response.

1. Complete and publish the DoD Directive and/or implement instructions for the TIP program that assign clear roles and responsibilities. (OPR: USD [P&R], OCR: COCOMs, Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

2. Establish and document a requirement for a periodic Office of the Secretary of Defense (OSD) TIP Coordinating Council meeting to review issues and to integrate DoD TIP program improvements. USD (P&R) should consider including the Services TIP POCs. (OPR: USD [P&R])

Marine Corps response: No comment, no action required.

3. Include TIP training in the Joint & Service institutional training curricula, at all levels, for both officers and enlisted service members. (OPR: USD [P&R], OCR: Director, Joint Staff, Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

4. Include TIP-related considerations when developing plans to establish new OCONUS bases, e.g., anti-TIP language in DoD contracts and pre-deployment TIP training requirements for service members and contractors. (OPR: USD [P&R], OCR: Regional COCOMs, Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

5. Develop TIP training modules that are based on realistic, military-related TIP scenarios. (OPR: USD [P&R], OCR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

6. Establish TIP-related training at all Power Projection Platforms and Mobilization Stations and other similar pre-deployment training venues. (OPR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

7. Include TIP training and planning as a part of the U.S. Army's Peacekeeping and Stability Operations Institute's (PKSOI) mission. (OPR: USD [P&R], OCR: Army)

Marine Corps response: No comment, no action required.

ENCLOSURE (|)

8. Develop TIP policy and program guidance unique to each Combatant Command (COCOM) and Military Service. Update after publication of the DoD directive/implementing instructions. (OPR: COCOMs/Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

9. Establish a metric to track TIP awareness training and understanding of TIP related policy and programs. This metric should track the total number of DoD personnel assigned and total number trained, broke out by military, DoD civilians, and DoD contractors. (OPR: USD [P&R], OCR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

10. Establish a Service TIP office of primary responsibility and designate a TIP program officer at each overseas military installation. (OPR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

11. Establish a memorandum of understanding with local law enforcement and nongovernmental organizations who work with victims of trafficking in persons and prostitution at or near overseas military installations. (OPR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

12. Finalize and issue installation-level TIP policy memoranda in accordance with OSD policy memoranda. Update after publication of DoD directive/implementing instructions. (OPR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

13. Conduct command evaluations of the effectiveness of TIP awareness training. (This evaluation should periodically involve the IG.) (OPR: Military Services)

Marine Corps response: Concur, OPR for the USMC is HQMC, PP&O.

14. Multi-National Force-Iraq (MNF-I) and Combined Forces Land Component Command (CFLCC) conduct a follow-up review to ensure DoD contractors compliance with U.S. law and command policy regarding trafficking in persons. Additional recommendations for specific Combatant Commands are in the appropriate chapter of the report.

Marine Corps response: No comment, no action required.

ENCLOSURE (|)

The Air Force did not respond to our request for Management Comments. We will ask them to respond to the final report within 90 days of publication.

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Appendix L – Combatant Command Comments

Rx Date/Time OCT-11-2006(WED) 15:07
10/11/2006 16:26 8138275823

8138275823
IG OFFICE

P.002
PAGE 02



UNITED STATES CENTRAL COMMAND
OFFICE OF THE CHIEF OF STAFF
7115 SOUTH BOUNDARY BOULEVARD
MACDILL AIR FORCE BASE, FLORIDA 33621-5101

CCDC-COS

11 Oct 06

MEMORANDUM FOR DIRECTOR, JOINT STAFF, JOINT CHIEFS OF STAFF,
PENTAGON, WASHINGTON DC 20318-9999

SUBJECT: Report of the Evaluation of the DoD Efforts to Combat
Trafficking in Persons (TIP); Action Folder: 06-04926

REF: USD Memorandum dtd 14 Sep 2006; Draft Report on the
Evaluation of the Department of Defense Efforts to Combat
Trafficking in Persons (TIP)

1. Per the reference, we have reviewed the draft DoDIG report and concur with no critical comments.
2. Specific comments addressing recommendations (contained on pages iv-vi) that are germane to USCENTCOM, to include Multi-National Force-Iraq and Coalition Forces Land Component Command, are provided below:
 - a. Recommendation #1. Complete and publish the DoD Directive and/or implementing instructions for the TIP program that assigns clear roles and responsibilities.

COMMENT. Concur. USCENTCOM published initial TIP policy guidance to all Component and Joint Task Force Commands on 25 July 2005, stressing mandatory TIP Awareness Training and the proactive identification and appropriate action against this criminal activity. Upon promulgation and receipt of the DoDI, we will publish additional policy guidance within 60 days.
 - b. Recommendation #4. Include TIP-related considerations when developing plans to establish new OCONUS bases, e.g., anti-TIP language in DoD contracts and pre-deployment TIP training requirements for service members and contractors.

COMMENT. Concur. USCENTCOM has provided, and our forward Components have implemented, mandated clauses into all solicitations and contracts, prohibiting all contractor activities that support or promote TIP. Pre-deployment TIP training has been incorporated by the Force Providers.

CCDC-COS

SUBJECT: Report of the Evaluation of the DoD Efforts to Combat Trafficking in Persons (TIP); Action Folder: 06-04926

c. Recommendation #8. Develop TIP policy and program guidance unique to each Combatant Command and Military Service. Update after publication of the DoD directive implementing instructions.

COMMENT. Concur. USCENTCOM has and will continue to provide expanded guidance unique to the Central Region.

d. Recommendation #14. Multi-National Force-Iraq (MNF-I) and Combined Forces Land Component Command (CFLCC) conduct a follow-up review to ensure DoD contractors' compliance with U.S. law and command policy regarding trafficking in persons.

COMMENTS. Concur.

(1) MNF-I completed a comprehensive investigative inquiry into allegations of improper treatment of workers by contractors and subcontractors in Iraq. Over a 4-month period, the command inspected worker life support areas across Iraq; met with over 800 Third Country National (TCN) workers from over 20 nations and employed by over 40 contractors and subcontractors. The command published an order establishing measurable and enforceable standards, responsibilities and a framework for the Command's continuing program to deter and combat human trafficking by DoD personnel or contractors in Iraq. MNF-I engaged base force protection, contracting officials and contractor representatives in facilitating the return of contractor/subcontractor-held passports to hundreds of TCN workers in Iraq. They conducted regular, unannounced spot checks of contractor/subcontractor worker life support areas to ensure compliance with law and command policy and developed a TIP "Frequently Asked Questions" tool and guidelines for workers changing employers while remaining in Iraq, to assist military and civilian personnel, contracting officials and contractor representatives in addressing TIP issues. MNF-I's ongoing and planned actions include: Sustained regular, unannounced spot checks of contractor/subcontractor worker life support areas to check compliance with law and MNF-I standards defined in the operational order. Formally re-inspect worker living conditions and employment practices at multiple MNF-I bases across Iraq (proposed for 4th Qtr, CY06) and reinforce training and education of DoD military and civilian personnel, and DoD contractors on the MNF-I standards, on how to recognize TIP activities and reporting procedures.

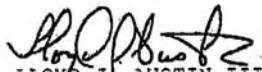
CCDC-COS

SUBJECT: Report of the Evaluation of the DoD Efforts to Combat
Trafficking in Persons (TIP); Action Folder: 06-04926

(2) CFLCC has published specific policy guidance to be included in all solicitations and contracts and is executing training for all contracting officials. Contractors must develop written policies to combat trafficking in persons, to include knowingly destroying, concealing, removing, confiscating or possessing any actual or purported passport or other immigration document, to prevent or restrict, without lawful authority, the person's liberty to move or travel, in order to maintain the labor or services of that person. CFLCC (IG/JA/Contracting Team) will conduct inspections in the 1st and 3rd Quarter, FY07 as part of a comprehensive follow-up review, to ensure the findings and recommendations of the DoDIG report are implemented.

3. We concur with the recommendations contained on page 36 of Chapter 3, which reiterate many of the draft report's previous recommendations. The CCIG will periodically inspect the Combatant Command TIP program as outlined by DoD Directive and/or implementing instructions.

4. Point of contact for this action is Mr. Dave Hamilton, CCJ1-XPP, DSN: 651-6608.


LLOYD J. AUSTIN III
Major General, USA



HEADQUARTERS
UNITED STATES EUROPEAN COMMAND
Office of the Chief of Staff
UNIT 30400
APO AE 09131

ECCS

05 Oct 2006

MEMORANDUM FOR


DOD IG, Office of Deputy Inspector General for Policy and Oversight, 400 Army Navy Drive, Arlington, VA 22204-4704

Director, Joint Staff, ATTN: Lt Col David D. Jividen, 5000 Joint Staff Pentagon, Washington, DC 20318-5000

SUBJECT: Response to DoD IG Report on the Evaluation of the DOD Efforts to Combat Trafficking in Persons (TIP)

1. We appreciate the opportunity to review the subject report, provide comments, and fully endorse the DoD IG's review of the involvement and development of the entire department's efforts with respect to this very sensitive and important topic. Appropriate steps need to be taken to ensure we remain in step with the spirit and intent of this initiative.
2. Although we support in principle the overall intent of the report, our comments highlight our concerns about the suggested alignment of responsibilities for the TIP program. In an effort to remain true to the traditional responsibilities of the military services to organize, train and equip their respective forces, it's extremely important we ensure that levels of responsibility are appropriately assigned and that the office of primary responsibility (OPR) for the TIP program be identified with the respective military services. In this regard, we provide the enclosed comments on our position and further clarification on areas addressed for EUCOM.
3. Point of Contact is ECJ1, Mr. F. Lopez, DSN 314-430-6275.

Encl:
Comments and Recommendations


WILLIAM D. CATTO
Major General, USMC
Chief of Staff

EUCOM Comments and Recommendations
on Draft DOD IG Report -
DOD Efforts to Combat Trafficking in Persons

1. EXSUM Recommendation 1: Concur with comments. DOD must provide clear guidance and implementing instructions to ensure appropriate action is taken at every possible level in DOD. To ensure maximum effectiveness and resource application, DOD should publish specific guidance and instructions to Military Services and DOD agencies in implementing this program at their levels.

2. EXSUM Recommendation 4: Concur with comments. Training for all deploying personnel (Service Members, Civilians, Contractors, etc.) must be a service component responsibility, and stipulated in their respective regulations.

3. EXSUM Recommendation 8: Concur with comments. Policy, program guidance and training on TIP must rest with the services in order to ensure all echelons are aware and can recognize TIP incidents and events. Concur also with the fact that Status of Forces Agreement (SOFA) does not need to be revised solely to deal with "outside the gate" aspects. Good host nation relations and close law enforcement cooperation are positive highlights for commanders in the overseas areas. This law enforcement aspect is best managed through direct links with the host nation agencies. The published EUCOM Deputy Commander's memorandum of 25 April 2006, addresses these points and clearly delineates EUCOM's initial guidance and direction to our components in this regard. This memorandum will be revised once DOD publishes guidance on TIP implementation.

4. Recommendation Chapter 4: Concur with comments.

a. Objectives. While we recognize that the stated IG Team's objective in this Chapter was to determine EUCOM's implementation of TIP training, we again reinforce the matter that training should be the services' responsibility as stated in Chapter 2. This is also stated on page 29 of the report as one of the factors (TIP Training Responsibility). We strongly recommend that the training responsibility by the Services be clearly defined when OSD writes their TIP directive or instructions.

b. TIP Policy Intent. DOS is TIP lead for USG. It seems that the overall DoD response to TIP is disjointed when compared to other recent initiatives, e.g., Sexual Assault Prevention and Response (SAPR) program. A more robust effort is needed to tell COCOMs and Services what the TIP "campaign plan" is and how will efforts be resourced (if at all). This area should be better clarified once a DOD publication depicting roles and responsibility for COCOMs and Military Services is published. In our view, COCOMs play a Strategic role (work with host nations, agreements, etc.) while Services are trainers and keepers of standards (operational /tactical).

c. Dispersion of EUCOM Personnel. Correct the fact that EUCOM is composed of ninety-two countries, instead of the stated "about fifty countries."

d. Senior Leader Involvement. We are concerned with this topic and it should be reworded and clarified. The following points should assist in this respect.

(1) Article 134, UCMJ is clear in terms of patronizing prostitution, but does not make it illegal for a person subject to the code to enter a brothel. We have seen no requirement to take it further and make "entrance into a brothel" the subject of a command policy letter. However, if prohibited activity is encountered, appropriate community/installation command level authority exists to address it (see (b) below).

(2) Within EUCOM, a tri-service regulation establishes policy and directives that address commanders' responsibility and procedures for imposing off-limits sanctions on suspect establishments. This authority is placed squarely on our Component Commanders for implementation and execution.

e. Commanders' Reactions. As stated above, the local enforcement and management execution in restricting establishments that may raise suspicion rests with command authority at the community/installation levels. The tri-service regulation published by the components is the key guide on this matter.

f. NGO Corruption in Bosnia. Concur with the potential seriousness of NGO corruption; however, we are concerned with the conclusion and generalization based on minimal data sources and analysis.

g. Recommendations for EUCOM. In line with our previous position and discussion, these recommendations are more applicable to the service component responsibilities in implementing TIP within respective services. The services specifically should be charged with the TIP awareness campaign, just as they now do an excellent approach for other critical programs (e.g., Family Support, Readiness, Safety and other campaigns). Any future DOD publication on TIP needs to cover this aspect of program implementation. Therefore, these recommendations should be revised and rewritten under the Military Services Chapter.



DEPARTMENT OF DEFENSE
UNITED STATES STRATEGIC COMMAND

Reply To:
USSTRATCOM J006
901 SAC BLVD STE 2E27
OFFUTT AFB NE 68113

29 Sep 06

MEMORANDUM FOR THE INSPECTOR GENERAL, DEPARTMENT OF DEFENSE

Attn: Dept of Defense Inspector General Office

Subject: USSTRATCOM Response to Report on the Evaluation of DoD Efforts to Combat
Trafficking in Persons (TIP)

1 Reference:

a. Memorandum for Undersecretary of Defense (Personnel and Readiness) dtd 14 Sep 06

2. In response to the tasking directed in reference (a), the following response is submitted to the recommendations contained in the same reference:

- a. Recommendation 1: DoD complete and publish the DoD Directive and/or implementing instructions for the TIP program that assigns clear roles and responsibilities.
Response: Concur. USSTRATCOM is a functional Combatant Commander with a world-wide mission.
Proposed Actions: Designate a TIP representative within J112, Personnel Readiness, to work with the command's Staff Judge Advocate office to incorporate DoD Directive requirements of TIP training into the pre-deployment briefs for all Individual Augmentees from USSTRATCOM. In addition, the Office of the Staff Judge Advocate will be responsible for providing annual TIP training and periodic updates for Headquarters and Joint Functional Component Command personnel;
- b. Recommendation 8: DoD develop TIP policy and program guidance unique to each Combatant Command and Military Service. Update after publication of the DoD Directive/implementing instructions.
Response: Concur.
Proposed Actions: Draft a TIP Policy Memorandum for CDRUSSTRATCOM's signature for distribution within Headquarters, USSTRATCOM and its Joint Functional Component Commands to stress the importance of the program and emphasize the requirement for all commanders to stress this issue within their

respective agencies. In addition, USSTRATCOM has identified a TIP point of contact (Chief, General and Military Law) who will oversee command training and the implementation of the DoD Directive requirements, when published. Lastly, incorporate "sensing" sessions with command personnel who return from deployment to gain a better appreciation for the TIP threats in their deployment area in order to: (1) develop techniques to combat those threats; and (2) report those threats up the chain for action, if necessary.



EDWARD E. HUNT III
Colonel, USAF
Staff Judge Advocate

Copy to:
Command Secretariat, HQ USSTRATCOM



UNITED STATES TRANSPORTATION COMMAND
608 SCOTT DRIVE
SCOTT AIR FORCE BASE, ILLINOIS 62225-5357

MEMORANDUM FOR DEPARTMENT OF DEFENSE, ASSISTANT INSPECTOR
GENERAL FOR INSPECTIONS AND EVALUATIONS

FROM: TCCS

SUBJECT: Concurrence with Report on the Evaluation of the Department of Defense (DOD)
Efforts to Combat Trafficking in Persons (TIP)

1. In response to your letter dated 14 September 2006, USTRANSCOM concurs with subject report Executive Summary Recommendations #1 and #8. In addition, the USTRANSCOM Commander signed and distributed to his staff a TIP policy statement effective 24 March 2006.
2. USTRANSCOM point of contact for future questions regarding this matter is CAPT Bradley A. Carpenter, USN, TCIG, DSN 779-1781 or COMM (618) 229-1781, bradley.carpenter@ustranscom.mil.

A handwritten signature in black ink that reads "William H. Johnson".

WILLIAM H. JOHNSON
Major General, U.S. Army
Chief of Staff



**NORTH AMERICAN AEROSPACE DEFENSE COMMAND
AND
UNITED STATES NORTHERN COMMAND**



MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

FROM: Director, Training and Education, NORAD and USNORTHCOM
250 Vandenberg Street, Ste B016
Peterson AFB CO 80914-3801

SUBJECT: N-NC Response to DoD IG Draft Report: Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP)

1. Subject draft report has been reviewed and it accurately indicates our COCOM initiatives with respect to Trafficking in Persons training in Chapter 5. Since the team visit and training update in August, N-NC has achieved training for all personnel.
2. With respect to report recommendations, only recommendations 1 and 8 are specifically pertinent. We concur as written with those recommendations. As N-NC would not usually respond in another COCOM's area of responsibility, we will defer any further comments until the final report.
3. Questions should be directed to Lt Col Doug Johnston, N-NC/J72, at DSN 834-0357, commercial (719) 556-0357.

E. G. PINO, SES, DAFC
Director, Joint Training and Exercise

Jividen, David D, Lt Col, JCS J5

From: Jividen, David D, Lt Col, JCS J5
Sent: Thursday, October 05, 2006 9:17 AM
To: 'Perez, John, Lt Col (H)'
Cc: White, MAJ
Subject: RE: 06-04926 - REPORT ON THE EVALUATION OF THE DOD EFFORTS TO COMBAT TRAFFICKING IN PERSONS (TIP) (PROJECT NO. D2006-DIPOE-0052.000) (U)

Classification: UNCLASSIFIED

Thank you sir!

Take care,

David

David D. Jividen

David D. Jividen, Lt Col, USAF
Chief, National Security Law Branch
Global Strategic Partnership Deputy Directorate
DSN 614-9134
Com (703) 614-9134

From: Perez, John, Lt Col (H) [mailto:PerezJo@hq.southcom.smil.mil]
Sent: Wednesday, October 04, 2006 5:30 PM
To: Jividen, David D, Lt Col, JCS J5
Cc: White, MAJ
Subject: 06-04926 - REPORT ON THE EVALUATION OF THE DOD EFFORTS TO COMBAT TRAFFICKING IN PERSONS (TIP) (PROJECT NO. D2006-DIPOE-0052.000) (U)
Importance: High

CLASSIFICATION: UNCLASSIFIED

Lt Col Jividen,

Per JS tasker 06-04926, USSOUTHCOM has reviewed the "Report on Evaluation of the Department of Defense (DoD) Efforts to Combat Trafficking in Persons (TIP)."

Of the 14 general recommendations in the report, COCOMs are assigned as OPRs or OCRs for three (items 1, 4, and 8). We concur with comment as follows:

- No. 1 – Complete and publish the DoD Directive and/or implementing instructions for the TIP program that assigns clear roles and responsibilities. (OPR: USD (P&R), OCR: COCOMs, Military Services.)

Concur with Comment: We understand COCOM role will be to provide input on anti-TIP Directive and implementing instructions prepared by DoD during the review and comment stage.

- No. 4 – Include TIP-related considerations when developing plans to establish new OCONUS bases, e.g., anti-TIP language in DoD contracts and pre-deployment TIP training requirements for service members and

10/12/2006

contractors. (OPR: USD (P&R), OCR: Regional COCOMs, Military Services).

Concur with Comment: Recommend revision to include TIP training requirements for civilian employees as well as contractor personnel and service members.

- No. 8 – Develop TIP policy and program guidance unique to each Combatant Command (COCOM) and Military Service. Update after publication of the DoD directive/implementing instructions. (OPR: COCOMs/Military Services).

Concur with Comment: Recommend rephrasing to read "Direct COCOMs and Services develop theater/service/program unique TIP policy and guidance as required after publication...?"

Concerning the six Specific Recommendations for USSOUTHCOM (also CENTCOM, NORTHCOM, and SOCOM), we concur with all six as written.

This review has been coordinated with USSOUTHCOM/JA and reviewed by USSOUTHCOM/IG. COL Jorge Matos, USSOUTHCOM/J5 (Security Cooperation) provided the O-6 planner review. Please direct any questions or comments to myself or Ms. Leana Bresnahan, SCJ5-CMR, DSN 567-1560, bresnahl@hq.southcom.smil.mil.

JOHN D. PEREZ, Lt Col, USAF

Chief, International Integration Division

Human Rights, State Partnership, and Foreign Liaison Programs

USSOUTHCOM SCJ5-CMR

(305) 437-1572 DSN 567-1572

perezjo@hq.southcom.smil.mil

CLASSIFICATION:UNCLASSIFIED

10/12/2006

Meyer, Stanley E., OIG DoD

From: Meyer, Stanley E., OIG DoD
Sent: Wednesday, October 18, 2006 7:13 AM
To: Reiff, Karen S CAPT USSOCOM HQ
Cc: Maser, Thomas J CAPT USSOCOM HQ
Subject: RE: Management Comments--Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP)

Capt Reiff,

Can you send me a short memo noting the SOCOM concur, specifically with the EXSUM Recommendations 1 and 8—signed by whoever is able to establish the command position on this subject? Thanks.

Stan Meyer

From: Reiff, Karen S CAPT USSOCOM HQ [mailto:reiffk@socom.mil]
Sent: Tuesday, October 17, 2006 3:08 PM
To: Meyer, Stanley E., OIG DoD
Cc: Maser, Thomas J CAPT USSOCOM HQ
Subject: Management Comments--Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP)

Mr. Meyer,

I had told CAPT Maser that I had closed out the tasker concerning this topic, but I included the comments in our tasker system. My boss, Lt Col Wright, and I both reviewed the document and concur with what is written. I apologize for the misunderstanding.

Capt Karen Reiff
Deputy HQ Commandant
HQ USSOCOM
813-828-2132

10/18/2006

Meyer, Stanley E., OIG DoD

From: Gaston, Tenesia F. MAJ [tenesia.gaston@jfcom.mil]
Sent: Wednesday, October 18, 2006 11:02 AM
To: Meyer, Stanley E., OIG DoD
Subject: RE: Management Comments--Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP) S: October 6, 2006
Sensitivity: Private

Mr. Myers,

This document has been looked at by our COS office and IG. USJFCOM response is concur as written.

v/r
MAJ Tenesia Gaston

From: Meyer, Stanley E., OIG DoD [mailto:Stanley.Meyer@DODIG.MIL]
Sent: Friday, September 15, 2006 9:09 AM
To: Shaw, Charles S. Col; Gaston, Tenesia F. MAJ
Cc: James.Nichols1@us.army.mil; Daniels, Linda, OIG DoD
Subject: FW: Management Comments--Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP) S: October 6, 2006
Sensitivity: Private

All,

JFCOM--Trying to get this report to COL Shaw, but got a reject message. Trying again.

Mr. Nichols—one recommendation involving your recommendation. You will probably get a tasker from the Army about it.

Stan Meyer

From: Meyer, Stanley E., OIG DoD
Sent: Thursday, September 14, 2006 3:19 PM
To: Ludowese, Jeryl C. COL USA; Miranda, Lt Col Joni L. (USAF); 'Jarrett, Victor W. CIV'; 'charles.shaw@jfcom.mil'; Armstrong, Steven E Col USA NORAD USNORTHCOM HQs IG; 'david.prather@pacom.mil'; 'john.stratis@pacom.mil'; 'washburt@hq.southcom.mil'; 'thomas.maser@socom.mil'; 'youngt@stratcom.mil'; Carpenter, Bradley CAPT USTRANSCOM IG; 'Henry.Jung@ignet.army.mil'; 'Henry.Jung@us.army.mil'; 'Gary.Helmes@arcent.army.mil'; 'Kevin.Fagedes@arcent.army.mil'; 'EadyL@korea.army.mil'; 'Jerry.Brown@usfj.mil'
Cc: Daniels, Linda, OIG DoD
Subject: Management Comments--Evaluation of DoD Efforts to Combat Trafficking in Persons (TIP) S: October 6, 2006
Sensitivity: Private

All,

1. The first attachment is the request for management comments. The second page of this attachment lists

10/18/2006

OPR/OCR responsibilities---i.e. if you are an OPR/OCR for a recommendation(s), you must respond with a concur, concur with comment, or nonconcur on each recommendation that you are the OPR/OCR for.

2. The second attachment is the report itself.
3. We are entering the COCOMs/MNF-I/CFLCC/USFJ/USFK via the IG. However, the IG will probably not be the office responding as the OPR/OCR for the recommendations (although we do appreciate any IG comments.) We just want the IG to get the report into the appropriate command office/mechanism to obtain a command response to the appropriate recommendations. The command response can come back through you to us or directly to us—it is up to you.
4. PACOM—the USFJ and USFK response can come through you or direct to us. Your call.
5. CENTCOM—MNF-I and CFLCC response can come through you or direct to us. Up to you.
5. **The suspense for management comments back to us is October 6, 2006.**
6. Please send an e-mail back to me confirming that you have received this tasking.

Thanks.

Stan Meyer
(703) 604-9130

This e-mail is from the Office of the Inspector General, Department of Defense, and may contain information that is "Law Enforcement Sensitive" {LES} or "For Official Use Only" {FOUO} or otherwise subject to the Privacy Act and/or legal and or other privileges that restrict release without appropriate legal authority.

10/18/2006

From: Johnson, Clifton T CDR PACOM, J111
Sent: Thursday, September 21, 2006 1:34 PM
To: 'david.jviden@js.pentagon.smil.mil'
Cc: Halloran, David LCDR PACOM, J1-EA; Petain, John N. SMSgt PACOM, J11;
Gilman, Henry J Col PACOM, J11
Subject: REPORT ON THE EVALUATION OF THE DOD EFFORTS TO COMBAT
TRAFFICKING IN PERSONS (TIP) (PROJECT NO. D2006-DIPOE-0052.000)
(U)

Classification: UNCLASSIFIED

Dave,

Advised via TMS to notify you that I am POC. Have reviewed the report and only have two (2) minor comments.

Page 31 - HQUSPAC lead 06 is USAF Colonel, USN Captain.

Page 33 - Television Station is "K GMB" vice "HGMB."

HQ USPACOM 06 Reviewing Officer is COL Joseph Pedone, J1.

R/CLIF

CDR CLIF JOHNSON

Branch Chief Personnel and Programs Division (J11) and
Commanding Officer, U. S. Navy Element (J111 N/MC)

HQ USPACOM Box 64017 (J11)

Camp H. M. Smith, HI 96861-4017

SIPRNET: clifton.johnson@pacom.smil.mil

NIPRNET: clifton.t.johnson1@pacom.mil

PHONE: 808-477-0957

FAX: 808-477-7132



HEADQUARTERS, UNITED STATES FORCES KOREA

UNIT #15237
APO AP 96205-5237

REPLY TO
ATTENTION OF:

IMKO-OPD

04 October 2006

MEMORANDUM FOR: INSPECTOR GENERAL, DEPARTMENT OF DEFENSE

SUBJECT: Report on the Evaluation of the Department of Defense Efforts to Combat
Trafficking in Persons (TIP)

1. Thank you for the opportunity to review the subject report. United States Forces Korea (USFK) concurs with the report and provides the following comments:
 - a. Bullet # 3 under "USFK Actions Taken" - USFK mandates all new arrivals receive Prostitution and Human Trafficking (P&HT) Awareness Training. USFK has also included P&HT Awareness training in the quarterly "New Horizon's Day" training which is mandatory for all USFK service members, Department of Defense civilian employees and invited contractors.
 - b. USFK established a P&HT Working Group headed by an O-7, to coordinate the commands efforts in combating P&HT.
2. USFK Point of contact is the undersigned, at DSN: 315 738-3295/ com: 011+822+7918-3295.

//SIGNED//

Charles H. Johnson
Action Officer
USFK P&HT Working Group

Reference. Report on the Evaluation of the Department of Defense Efforts to Combat
Trafficking in Persons (TIP) (Project No. D2006-DIPOE-0052.00).

Meyer, Stanley E., OIG DoD

From: Brown, Jerry P COL USA USFJ J0 [Jerry.Brown@usfj.mil]
Sent: Tuesday, October 31, 2006 2:41 AM
To: Meyer, Stanley E., OIG DoD
Subject: FW: USFJ Response/Comments
Attachments: Unwavering Professionalism Tri-Fold.pdf; USFJ Policy Letter #1 Unwavering Professionalism.pdf; USFJ Reclama re DOD IG Rpt on TIP (061031).pdf; USFJ Recommended Changes to DoD Rpt on TIP (061031).pdf

Stan,

Concur with your proposal. As I understand it, the rewritten recommendation section will say:

1. Create an AOR-specific TIP training module, as required, to supplement DoD TIP training. Provide the training module to assigned Service Components for execution.
2. Establish a TIP office of primary responsibility and designate a TIP program officer.
3. Continue to emphasize Unwavering Professionalism as a way of life for all DoD personnel in Japan.

I am resending the attachments. If they still don't come through, let me know and we will fax them to you.

COL Brown

From: Meyer, Stanley E., OIG DoD [mailto:Stanley.Meyer@dodig.mil]
Sent: Friday, October 27, 2006 9:21 PM
To: Brown, Jerry P COL USA USFJ J0
Subject: RE: USFJ Response/Comments

COL Brown,

I have looked over your comments in the basic memorandum. Just a couple of thoughts on the recommendations.

1. The first USFJ recommendation in the draft report is not an attempt to have USFJ usurp the Service responsibility to train individual Service Members and organizations. Rather, it is a call for the USFJ staff (TIP POC) to complete a staff analysis of the AOR and identify anything AOR specific that should be included in TIP training. The product ("AOR-specific TIP training module") might be as simple as a few Power Point Slides that your TIP POC would provide to your assigned Service Commands to add to their Service training. Or, the staff analysis might result in nothing, if it is determined that there is nothing AOR-specific not already covered in the Service training. The USFJ staff does this all the time as they develop/review/update OPLANS for the USFJ AOR. Additionally, the requirement to plan for TIP considerations is inherent in the DoDD 3000.05 "Military Support for Stability, Security, Transition, and Reconstruction (SSTR) Operations." For example, while the USFK analysis determined the need for some AOR-specific additional training emphasizing the commercial sex aspect of TIP, CENTCOM's analysis resulted in development of additional training/orders focusing on the labor trafficking aspect. EUCOM is planning for labor trafficking issues, if required to establish bases in eastern European countries. Based on this, I ask you to consider a rewording of the first recommendation, as follows:

"Create an AOR-specific TIP training module, as required, to supplement DoD TIP training. Provide the training module to assigned Service Components for execution."

I think this is another way of saying "Continue to assist the Services in emphasizing TIP awareness..." but

10/31/2006

establishes an actionable objective/metric—"We conducted an AOR-specific analysis of this issue and determined.....and will/have taken the following actions."

2. Somebody has to be responsible for doing the things outlined above and in the DoD Directive 3000.05, thus a TIP POC/program officer—recommendation #2. (We think the currently staffing USD(P&R) DoDD on Combating TIP will require a POC/program officer also.) So we think that recommendation 2 is also a good idea.
3. We will delete recommendation #3 about the MOU, leaving it at the Service/installation level to deal with that issue.
4. What do you think?
5. FYI—I know you asked about the Service positions on this issue. Army and Marines have concurred. Still waiting on Navy and Air Force, but expect concurs. PACOM and USFK concurred with their portions of the report.
5. I look forward to seeing the Attachments to the basic memo, especially Attachment 1.

Thanks.

Stan Meyer

From: Brown, Jerry P COL USA USFJ J0 [mailto:Jerry.Brown@usfj.mil]
Sent: Friday, October 27, 2006 4:42 AM
To: Meyer, Stanley E., OIG DoD
Subject: FW: USFJ Response/Comments

Stan,

Am not sure if this was launched so I'm sending it again.

COL Brown

From: Brown, Jerry P COL USA USFJ J0
Sent: Friday, October 27, 2006 5:40 PM
To: 'Meyer, Stanley E., OIG DoD'
Cc: 'crystalfocus@dodig.mil'
Subject: USFJ Response/Comments

Stan,

Apologize for the delay. Attached is the USFJ response. Please call or contact me if you have questions.
Thanks.

COL Brown

This e-mail is from the Office of the Inspector General, Department of Defense, and may contain information that is "Law Enforcement Sensitive" {LES} or "For Official Use Only" {FOUO} or otherwise subject to the Privacy Act and/or legal and or other privileges that restrict release without appropriate legal authority.

10/31/2006



HEADQUARTERS
UNITED STATES FORCES, JAPAN
APO AREA PACIFIC 96328-5068

25 Oct 06

MEMORANDUM FOR DOD/IG

FROM: J02

SUBJECT: Management Comments – Report on the Evaluation of the Department of Defense (DoD) Efforts to Combat Trafficking in Persons (TIP) (Project No. D2006-DIPOE1-0052.000)

1. The following management comments are submitted on behalf of United States Forces, Japan (USFJ). USFJ is fully supportive of the DoD program to defeat TIP and is engaged to assist in implementing the TIP awareness effort. While supportive of the DoD program, current command relationships prevent USFJ from directing Service efforts in Japan with regard to this matter. Given these constraints, we were unable to concur with the current recommendations for USFJ. We propose, instead, to substitute the following recommendations for USFJ:

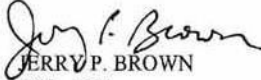
- o Continue to assist the Services in emphasizing TIP awareness and understanding of DoD's TIP policies and programs.
- o Continue to emphasize Unwavering Professionalism as a way of life for all DoD personnel in Japan.

These recommendations will assist in improving awareness of the TIP issue. They should also increase both our personnel's sensitivity to the issue and their knowledge of how to deal with a TIP situation should they encounter one.

2. Additionally, USFJ recommends changes to the section dealing with USFJ. Attached are our proposed changes (Attachment 1).

- a. The first paragraph includes the actual mission statement of USFJ instead of the summarized mission statement that had been used.
- b. Changes to the second paragraph were made to make it grammatically correct given the new mission statement.
- c. The third and fourth paragraphs highlight that COMUSJAPAN has led the effort to inculcate a way of life based on his Unwavering Professionalism philosophy (explained in the attached tri-fold and USFJ Policy Letter No. 1). That philosophy helps USFJ personnel avoid supporting TIP and reduces the demand side of TIP.
- d. In the CONCLUSIONS section, we recommend removing "USFJ" in favor of "Services" when stating that "USFJ should take additional actions ..." given our lack of authority over the affected personnel.

3. If USFJ may be of further assistance, I may be reached at DSN (315) 225-4288 or jerry.brown@usfj.mil.


JERRY P. BROWN
COL, USA
Chief of Staff

3 Attachments

1. Recommended changes
2. Unwavering Professionalism Tri-fold
3. USFJ Policy Letter No. 1

UNITED STATES FORCES JAPAN (USFJ)

United States Forces, Japan, supports U.S. forward presence and ensures bilateral defense cooperation with the Government of Japan to promote regional stability and deter aggression. Should deterrence fail, USFJ conducts and supports combat operations in the region to defend Japan.

Commander, U.S. Forces Japan, develops plans for the defense of Japan and is prepared, if contingencies arise, to assume operational control of assigned and attached U.S. forces for the execution of those plans. In peacetime, the Commander, U.S. Forces Japan, represents the Pacific Commander in relations among U.S. forces and other Department of Defense elements, the Ambassador, the Japan Defense Agency, and other agencies of the Government of Japan.¹⁷

As a subunified command under the US Pacific Command, the USFJ Commander initiated an Unwavering Professionalism campaign that addresses many of the underlying components of the TIP issue. Each of the four Services, including Commander, Seventh Fleet, is fully supporting and implementing the Unwavering Professionalism campaign. Each has also implemented all mandatory TIP training modules for personnel deploying overseas.

USFJ Actions Taken

- o Published "Our Commitment to Unwavering Professionalism"(March 4, 2005)
- Published USFJ Policy Letter No. 1 (January 2006)
- o Published local base newspaper stories describing Trafficking in Persons problems and issues.

Conclusions

Forces assigned to the USFJ AO are considered deployed and require TIP awareness training. Services should take additional actions to strengthen service members' awareness and understanding of DoD's TIP policies and programs.

Command officials in Okinawa said that adequacy of local laws and international Status of Forces Agreements (SOFA) are dependent on host nation support and involvement. Commanders can place establishments off limits, but do not possess the authority to halt or challenge illegal/undesirable activity "outside the gate" without local law enforcement conformity and action on the matter. Nevertheless, none of the Military Service commanders or staff in Okinawa favored revising the SOFA solely to address TIP issues. Commanders in Okinawa did not see their authority "outside the gate" as a significant issue.

Recommendations for USFJ

1. Create an AOR-specific TIP training module, as required, to supplement DoD TIP training. Provide the training module to assigned Service Components for execution.
2. Establish a TIP office of primary responsibility and designate a TIP program officer.
3. Continue to emphasize Unwavering Professionalism as a way of life for all DoD personnel in Japan.

¹⁷ <http://www.globalsecurity.org/military/agency/dod/usfj.htm>

An unwavering commitment to the highest levels of professionalism will always be the foundation of what we do, and more importantly, who we are.

It is clear that our mission in support of the defense of Japan and peace and stability in the Asia-Pacific region is a mission that requires the consistent and combined efforts of all U.S. forces in Japan, working together toward a common mission. Our mission success hinges on how effectively we can jointly and seamlessly interoperate, with each other, and with our Japanese military counterparts.

My command philosophy boils down to two words: unwavering professionalism.

To put my beliefs in context: each of our uniformed services has core values. Collectively, these values include such characteristics as integrity, service, excellence, honor, courage, commitment, loyalty, duty and respect. These values are founded

on what the majority of us believe and can be further boiled down to two main principles that support the concept of unwavering professionalism: moral commitment and technical proficiency.

When I say moral commitment, I am talking about consistently doing the right thing, both in terms of what society expects of us, as well as what we should expect of ourselves when we look in the mirror.

When we joined the military services, we all swore an oath to support and defend the Constitution of the United States. In making that oath, we affirmed and com-

mitted ourselves to defending a way of life and a set of beliefs – because our Constitution not only defines our

system of government, but also our national character as a free and democratic society whose citizens enjoy a wide array of rights, privileges and responsibilities –

thanks in large part to the protection that we provide to our nation and its interests at home and abroad.

So the commitment we continue to make as defenders of the Constitution is a lasting one: it is an obligation that we must meet 24/7, on or off duty, on and off our installations, in our professional and private lives. And it requires us to be consistently committed to upholding the highest principles of our profession of arms, and remaining loyal to these principles, even when they seem unpopular or inconvenient.

That's moral commitment. If you see a relation between moral commitment and leadership, it's no coincidence.

Technical proficiency is even easier to understand, and, again,

it applies to how the majority of us operate. It's about making a commitment to being the most

competent individual you can be – both in your professional and personal conduct – and it's about taking that competency and applying it to helping others within



Lt. Gen. Bruce A. Wright

It's about making a commitment to being the most competent individual you can be ...

the command reach our common objectives.

Most important, however, unwavering professionalism means taking these two principles – moral commitment and technical proficiency – and making them an integral part of our daily lives, and then regularly demonstrating it in leadership by example every day, all the time, no matter who may or may not be around to see us.

After more than 30 years of serving in the armed forces, I am convinced that we will succeed beyond our highest expectations if each and every one of us adopts a commitment to these two principles of unwavering professionalism.

If some of this is new to you, that's okay. You now know about your new commander's "code of conduct" for U.S. Forces, Japan. We can accept no less – from ourselves or our counterparts in the profession of arms. There is absolutely no doubt almost every single member of U.S. Forces, Japan, understands and lives by

the standards I have described. For the very few who choose a different path, I will not abide standards that our force can not and will not accept. Those who cannot find the self-discipline to maintain the standards of our profession will not be tolerated within our ranks.

... these values include such characteristics as integrity, service, excellence, honor, courage, commitment, loyalty, duty and respect.

Thank you for your unwavering professionalism. The Nation we serve, the Allies we team with, and the tremendous responsibilities we are given to guarantee the credible combat capability of the U.S.-Japan Security Alliance demand no less.

Our Commitment to Unwavering Professionalism

By Lt. Gen. Bruce A. Wright
Commander of
U.S. Forces, Japan
and
Fifth Air Force

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HEADQUARTERS
UNITED STATES FORCES, JAPAN
APO AREA PACIFIC 96328-5088

USFJ Policy Letter No. 1

SUBJECT: Unwavering Professionalism

1. Building upon Commander US Forces, Japan's (USFJ) emphasis on "unwavering professionalism," USFJ component commanders recently reaffirmed their commitment to a culture that rejects incidents of misconduct involving USFJ personnel. Such recent incidents have challenged Japanese public confidence in the professionalism and values of our US military. The responsibility of every member of USFJ is founded on our sworn commitment to adhere to and implement all orders, policies, and directives necessary to attain the high standards of professionalism required to carry out our mission. USFJ and component command leadership--officer and enlisted--will remain absolutely committed to a culture that rejects incidents of misconduct and to take all necessary efforts to reduce and prevent such events.

a. Duty in a foreign country requires a high degree of responsibility and dependability from everyone. Each of us--officer, enlisted, civilian employee and dependant--is a representative or emissary of the United States, 24 hours a day. Personal choices and conduct may influence and significantly impact international relations, positively or negatively. The consequences of not sustaining the highest levels of professionalism may be a weakened US - Japan Security Alliance and increased risk of losing the support of the Japanese people and government.

b. Accordingly, we must avoid any form of misconduct and must always be good neighbors to our Japanese hosts. Incidents of misconduct, especially those involving Japanese citizens or property, decrease public support for the US - Japan alliance and undermine USG/GOJ efforts to achieve close cooperation in order to promote regional security and stability. Such events lead some to question the credibility and strength of our commitment to the Government of Japan and its people.

c. Some in Japan, especially those who wish to drive a wedge between our alliance, tend to view incidents of misconduct, not as single events, but as a continuum of incidents committed by all US forces in Japan. We cannot afford to undermine our bilateral relationship with actions that clearly fall outside the definition of a professional, honorable military force. As members of the same team we must be committed to watching out for each other with a culture that rejects incidents of misconduct.

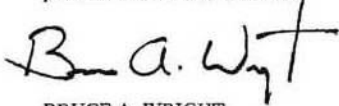
d. COMUSJAPAN previously promulgated his Commander's Intent regarding Unwavering Professionalism on 4 March 2005 (attached). We believe it and our respective Service's core values form the bedrock for our continuing commitment to reduce incidents of misconduct. We will continue to develop effective means to help our personnel internalize these bedrock principles.

2. Chains of command across USFJ are ultimately responsible for the actions of our USFJ members. We need to convince our personnel of the importance of each of their actions and hold them

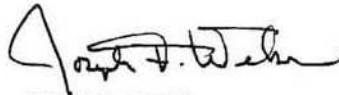
accountable for failures to act appropriately. Moreover, we are committed to supporting and enabling our mid-level leaders to actively engage with the personnel across all our commands, whether those personnel directly work for them or not. By promoting value-based leadership, our combined efforts over the past few years have significantly reduced the rate and number of incidents in Japan, and we will continue to focus on the professionalism of our force. We are confident that increased command emphasis on adherence to values, standards, concern for each other's welfare, and attention to detail, along with cross-flow of information among component commands, will further reduce incidents of misconduct.

3. Finally, we are committed to improving the processes we use to respond to incidents of misconduct. Timely provision of information vertically and across the chain of command is critical to our ability to ensure appropriate actions are taken. We intend to continue to work closely together to ensure US and Japanese response and investigation into any incident of misconduct is coordinated, and procedures guarantee rapid, accurate information exchange across the command and with appropriate host nation authorities. We will also continue to improve our ability to ensure timely notification processes to protect US interests while complying with our obligations to CDRUSPACOM, the United States Government, and Government of Japan.

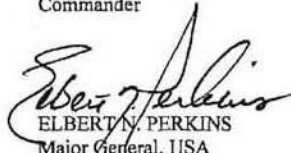
4. Together, we will make "Unwavering Professionalism" a leadership constant. It will be a pillar of individual responsibility for every member of USFJ resulting in a culture that rejects incidents of misconduct. The strength of the US-Japan Alliance, the confidence of our Japanese hosts, and our personal honor demand no less.



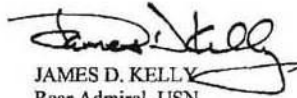
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Commander



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Commanding General, USARJ



JAMES D. KELLY
Rear Admiral, USN
Commander, U.S. Naval Forces, Japan



JONATHAN W. GREENERT
Vice Admiral, USN
Commander, Seventh Fleet

Appendix M – NGO & U.S. Government Organizations **Combating Trafficking in Persons**

Action to Counter Trafficking (ACT), U.S. Association for International Migration - The ACT project provides community outreach and education and offers social service providers training, networking, and financial and technical expertise to combat trafficking in the United States.

Anti-Slavery International (ASI) - ASI works to end slavery and related abuses, including trafficking in persons and forced prostitution.

Center for Balkan Development (Formerly ‘Friends of Bosnia’) - Provides reconstruction and humanitarian support to the Balkans.

Center for Strategic & International Studies (CSIS) – Non-profit organization that seeks to advance global security and prosperity.

Free the Slaves - This organization works to end slavery worldwide.

Freedom Network (USA) - The Freedom Network develops local and national networks in the U.S. and links to international networks to carry out its mission of empowering trafficked and enslaved persons.

Human Rights Watch (HRW) Campaign Against the Trafficking of Women and Girls - HRW works to protect the human rights of people around the world and campaigns against trafficking.

International Organization for Migration (IOM) - This international organization works with migrants and governments to provide humane responses to migration challenges.

My Sister’s Place (Durebang) - A mission program of the National Church Women's Association of the Presbyterian Church in the Republic of Korea that is supported in part by grants from Global Ministries. Its mission includes providing a place of compassion and support for all women, especially current and former prostitutes, who have been living a life of alienation and oppression, and who are in need of friendship and hope.

Office of Refugee Resettlement (ORR), U.S. Department of Health and Human Services - ORR helps refugees and other special populations (such as adult victims of severe forms of trafficking) obtain economic and social self-sufficiency in the United States.

Office of Women in Development (WID), United States Agency for International Development (USAID) - USAID's WID program supports the education of girls and promotes economic and political opportunities for women.

Office on Violence Against Women (OVW), U.S. Department of Justice -
OVW provides national and international leadership on legal and policy issues regarding violence against women, including trafficking in persons and worker exploitation.

Safe Horizon - Safe Horizon's mission is to provide support, prevent violence, and promote justice for victims of crime and abuse, their families, and communities.

The Asia Foundation - A non-profit, non-governmental organization committed to the development of a peaceful, prosperous, just, and open Asia-Pacific region. The Foundation supports programs in Asia that help improve governance and law, economic reform and development, women's empowerment, and international relations.

The International Humanitarian Campaign Against the Exploitation of Children (IHCAEC) - Works to combat trafficking in children.

The International Rescue Committee (IRC) - The IRC provides assistance to refugees, displaced persons and others fleeing persecution and violent conflict throughout the world.

The Protection Project - The Protection Project gathers and disseminates information about worldwide trafficking in persons, focusing on national and international laws, legal cases, and implications of trafficking in other areas of U.S. and international foreign policy.

Trafficking in Persons and Worker Exploitation Task Force (TPWETF), U.S. Department of Justice, Civil Rights Division - TPWETF works to prevent trafficking in persons and worker exploitation throughout the United States and investigates and prosecutes cases when violations occur.

Women's Bureau, U.S. Department of Labor -
The Women's Bureau helps to provide employment opportunities for women.

Appendix N – Glossary

Section I: Acronyms

AC	Active Component
AF	Air Force
AKO	Army Knowledge Online
AOR	Area of Responsibility
AR	Army Regulation
ARCENT	Army Central Command
ARNG	Army National Guard
CENTCOM	Central Command (Also called USCENTCOM)
CFLCC	Coalition Forces Land Component Commander
COCOM	Combatant Command
CTIP	Combating Trafficking In Persons
DepSecDef	Deputy Secretary of Defense
DFARS	Defense Federal Acquisition Regulation Supplement
DoD	Department of Defense
DoD IG	Department of Defense Inspector General
DoS	Department of State
EUCOM	European Command (Also called USEUCOM)
FAR	Federal Acquisition Regulation
IG	Inspector General
JS	Joint Staff
JS TIP	Joint Staff Trafficking in Persons

JTF-N	Joint Task Force North (component of USNORTHCOM)
KBR	Kellogg, Brown, and Root
LOGCAP	Logistics Civil Augmentation Program
MEJA	Military Extraterritorial Jurisdiction Act
MCM	Manual for Courts-Martial
MNF-I	Multi-National Force Iraq
MP	Military Police
MS	Mobilization Station
NATO	North Atlantic Treaty Organization
NGO	Non-governmental Organization
NORTHCOM	Northern Command (Also called USNORTHCOM)
NSPD	National Security Policy Directive
OGC	Office of the General Council
OIG	Office of Inspector General
OJCS	Office of Joint Chiefs of Staff
OCR	Office of Collateral Responsibility
OPR	Office of Primary Responsibility
OSD	Office of the Secretary of Defense
OUSD	Office of the Under Secretary of Defense
PACOM	Pacific Command (Also called USPACOM)
P&HT	Prostitution and Human Trafficking
PDUSD(P&R)	Principal Deputy, Under Secretary of Defense for Personnel and Readiness
PKSOI	United States Army's Peacekeeping and Stability Operations Institute
POC	Point of Contact

SecDef	Secretary of Defense
SOCOM	Special Operations Command (Also called USSOCOM)
SOFA	Status of Forces Agreement
SOUTHCOM	Southern Command (Also called USSOUTHCOM)
TIP	Trafficking in Persons (also known as Human Trafficking)
TVPA	Trafficking Victims Protection Act
TVPRA	Trafficking Victims Protection Reauthorization Act
UCMJ	Uniform Code of Military Justice
USAID	United States Agency for International Development
USCENTCOM	United States Central Command (Also called CENTCOM)
USEUCOM	United States European Command (Also called EUCOM)
USD(P&R)	Under Secretary of Defense for Personnel and Readiness
USFJ	United States Forces Japan
USFK	United States Forces Korea
USN	United States Navy
USNORTHCOM	United States Northern Command (Also called NORTHCOM)
USPACOM	United States Pacific Command (Also called PACOM)
USSOCOM	United States Special Operations Command (Also called SOCOM)
USSOUTHCOM	United States Southern Command (Also called SOUTHCOM)

Section II: Terms

Coercion –(a) threats of serious harm to or physical restraint against any person; (b) any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or, (c) the abuse or threatened abuse of the legal process.

Commercial Sex Act – Any sex act that entails something of value being given or received by any person.

Debt Bondage – Condition of a debtor arising from a pledge by the debtor of his or her personal services, or those of a person under his or her control, as a security for debt.

Involuntary Servitude – Condition of servitude induced by means of any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into and continue servitude, he or she would suffer serious harm.

Sex Trafficking – Recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a sex act.

Trafficking In Persons - The recruitment, transportation, transfer, harboring or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability; or giving or receiving payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude, or the removal of organs.

Appendix O – Report Distribution

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DoD Agencies

Director, Defense Logistic Agency
Director, Defense Contract Management Agency*
Director, Defense Contract Audit Agency*
Director, Defense Legal Services Agency
Director, Defense Security Cooperation Agency

Non-Defense Federal Organizations

Government Accountability Office
Special Inspector General for Iraq Reconstruction
U.S. Department of State
Office to Monitor and Combat Human Trafficking
United States Mission to NATO
United States Mission to the United Nations
U.S. Department of Justice, Civil Rights Division

Congressional Committees and Subcommittees, Chairman and Ranking Minority Member

Senate Committee on Appropriations
Senate Subcommittee on Defense, Committee on Appropriations
Senate Committee on Armed Services
Senate Committee on Homeland Security and Governmental Affairs
Senate Committee on Foreign Relations
Senate Subcommittee on Personnel, Committee on Armed Services
Senate Subcommittee on Immigration, Border Security, and Citizenship,
Committee on the Judiciary
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House Committee on Armed Services
House Committee on Government Reform
House Subcommittee on National Security, Emerging Threats, and International Relations,
Committee on Government Reform
House Committee on International Relations
House Subcommittee on Defense, Committee on Appropriations

* Sent a draft copy of the report soliciting management comments.

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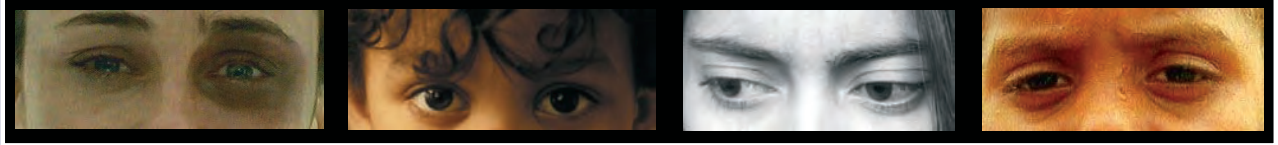
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combat organized crime syndicates trafficking in persons

Be a voice...



sex slaves and child prostitutes - human faces of modern day slavery

Photographs Courtesy of the Department of Justice, The Protection Project at Johns Hopkins University - SAIS, and the United Nations Office on Drugs and Crime.

report human trafficking

e-mail us at
hotline@dodig.mil

"There's a special evil in the abuse and exploitation of the most innocent and vulnerable. The victims of sex trade see little of life before they see the worst of life - an underground of brutality and lonely fear. Those who patronize this industry debase themselves and deepen the misery of others. And governments that tolerate this trade are tolerating a form of slavery."

President George W. Bush
September 23, 2003

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