

THE OKLAHOMA HUMAN TRAFFICKING DATA SYSTEM: A STATEWIDE MODEL

Policy Recommendations for the Oklahoma Human Trafficking Data System

Phase 1 Strategy & Implementation Framework

June 2025



Prepared on behalf of the Office of the Oklahoma Attorney General by HTI Labs, a mission-driven technology and research organization with over a decade of experience designing anti-trafficking systems in Nebraska and leading cross-sector collaboration efforts across the U.S.

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Most importantly, we honor the survivors, advocates, investigators, and service providers in Oklahoma, Nebraska, and beyond, whose daily work continues to inform and inspire this effort. Their persistence is the reason this system exists.

ABOUT HTI LABS

HTI Labs is a mission-driven technology and research organization dedicated to advancing data-driven solutions that prevent human trafficking from falling through the cracks. In lockstep with frontline professionals, we are building a unified system that identifies trafficking and reshapes how communities collaborate to respond. Our work bridges disciplines—from data science and engineering to policy, investigative analysis, and systems design—to create tools that are technically rigorous, deeply confidential, and grounded in field realities.

Founded out of anti-trafficking work in Nebraska, HTI Labs has spent over a decade building cross-sector systems for intelligence collection and dissemination, survivor support, and victim-centered investigations. As members of the state's anti-trafficking task force, our founding team worked side-by-side with investigators, advocates, analysts, survivors, and professionals in child welfare and schools to identify systemic barriers and develop tailored, compliance-aligned solutions. That work laid the foundation for two flagship tools: **PAVE** (used by schools, victim services, tribal services, and the state's Division of Child & Family Services) and **LEADS** (used by law enforcement statewide through the Attorney General's task force, and by financial fraud analysts at a regional bank).

Over time, these tools became more than just software—they became infrastructure. Today, HTI Labs serves as the architect and steward of the **HTI Platform** and **HTI Network**: a standards-aligned framework that supports rule-based data-sharing and cross-sector collaboration. What began in a Nebraska research lab has since empowered champions and connected the dots on local, regional, and international exploitation. Oklahoma's partnership now expands what's possible by establishing best practices to support system transformation at scale.

While we rarely publicize our work, the tools we built have quietly supported hundreds of investigations, helped connect survivors to services, and enabled breakthroughs that might otherwise have been missed. We remain grounded in the belief that **quiet, effective infrastructure is one of the most powerful tools in the fight against exploitation**—and that building it well requires deep technical rigor, humility, and trust.

To learn more, visit www.htilabs.org.



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EXECUTIVE SUMMARY

★ Phase 1 Strategy & Implementation Framework for a Statewide Anti-Trafficking Data System in Oklahoma

① About This Summary:

This Executive Summary distills the Phase 1 vision for the Oklahoma Human Trafficking Data System—a joint effort between the Oklahoma Attorney General's Office (OAG) and HTI Labs to customize the HTI Platform for the State of Oklahoma.

Vision, Mandate, & Opportunity

Oklahoma is leading the nation with the first statewide anti-trafficking data system designed for cross-sector coordination, survivor protection, and actionable intelligence across sectors. Phase 1, led by the OAG in collaboration with HTI Labs, focused on building the foundation and governance strategy for a secure, sustainable, and survivor-centered system. The process engaged key sectors—including victim service providers (VSPs), law enforcement, child welfare services (CWS), and national experts—to develop a unified vision. The resulting framework honors Oklahoma's statutory mandate for victim protection, institutional accountability, and compliance with both state and federal standards.

Oklahoma House Bill

4210 (Oklahoma Legislature, 2022)

established a statewide commitment to disrupting trafficking wherever it occurs.

The statute authorizes the OAG to serve as

the lead agency for coordinating trafficking identification and response efforts across the state. Following a nationwide vendor assessment, the OAG selected HTI Labs to support this effort through:

- A secure, cloud-based platform and compliance-aligned architecture
- Scalable tools for agencies and providers
- Stakeholder-driven feature development, criminal intelligence analysis, and research

This project responds to a critical statewide need: **integrated, data-informed, cross-sector coordination** to protect victims, support investigations, and meet Oklahoma's legislative mandate.



HTI Labs brings over a decade of experience designing and operationalizing anti-trafficking technologies. As core members of Nebraska's human trafficking task force, HTI Labs partners directly with prosecutors, law enforcement, and service providers. HTI Labs' initial tools, PAVE and LEADS, were developed in response to real-world investigative and coordination gaps, and are now in active use to support both identification and prosecution. This field-tested foundation enables HTI Labs to support the OAG-led system with technical rigor, legal compliance, and deep implementation insight, ensuring the platform meets the real-world needs of those working to protect survivors.



The proposed system is designed to:

- ✓ Identify and support victims earlier through proactive, coordinated screening and response.
- ✓ Equip each sector with tools tailored to its role, while enabling secure collaboration.
- ✓ Build trust and data integrity through governance, standardized protocols, and safeguards.
- ✓ Protect confidentiality and enforce access with clear permissions and scalable architecture.
- ✓ Deliver actionable data to improve detection, care, and prosecution outcomes.
- ✓ Facilitate deconfliction across law enforcement agencies and victim service providers (VSPs) as well as between them, thereby increasing the efficiency of the anti-trafficking system.

❖ Key Concept:

Together, the OAG, the Oklahoma Coalition Against Trafficking (OCAT), and HTI Labs steward a shared vision: *to build a secure, actionable, and survivor-centered data system that meets state and federal requirements while prioritizing trust and privacy.*

Discovery & Methodology

Phase 1: Foundation & Governance included:

- **Initial system mapping**, covering workflows across VSPs, law enforcement, CWS, and multi-disciplinary teams (MDTs).
- **Workgroup formation** with three levels of oversight ensuring representation from all key sectors. These workgroups are heavily guided by OCAT in order to preserve expertise and long term project success.
- **Policy and compliance alignment** through deep reviews of VAWA, OAC Title 75:30, CJIS, and 28 CFR Part 23.
- **Technical demonstrations and site visits** including sandbox testing and scenario-driven walkthroughs.
- **Established metric and audit goals** to ensure long-term system integrity, adoption, and measurable outcomes.
- Though the system operates as a closed-loop in terms of membership, a key capability is its **ability to integrate external data sources and connect to additional tools** over time.

→ NOTE:

While grounded in Oklahoma's statutory and operational context, this framework may serve as a model for other states seeking to build a survivor-centered, cross-sector data system. It aligns with federal compliance standards and is designed to be *adaptable across jurisdictions*.

This was a practitioner-led process: grounded in real-world experience, shaped by cross-sector workgroups, and built alongside the very professionals who will use the system every day.

System Model Overview: Governance, Platform, & Applications

The system architecture is built in two core components:

- **HTI Platform** (Technical Backbone → *Hosts & Enforces*): This is a secure technical infrastructure that supports identity management, audit logging, role-based permissions, data exchange, and centralized safeguards. HTI Labs will adapt this infrastructure to serve as the common foundation for all statewide applications. The OAG will formally adopt this platform as the system's technical backbone and steward its governance moving forward.



- **HTI Network** (Institutional Backbone → *Defines, Participates, Grows*): This is a cross-sector governance structure that sets rules for data access, safeguards, and operational standards. It ensures legal compliance, role-based protections, and trust across agencies in order to safely exchange information, support investigations, and protect survivors. OCAT will drive key governance rules and standards to ensure Oklahoma agencies are effective, collectively and individually, and that data is managed appropriately.

❖ **Key Concept:**

Together, HTI Platform (system infrastructure) and HTI Network (platform rules) support a legally defensible rollout of screening, referrals, intelligence sharing, and victim services across sectors. These layers support five role-based applications, each serving as a structural beam of the system, aligned to a specific function and user group.

Implementation Strategy for a Coordinated System of Identification & Response: 5 Applications

Each application lives within a closed-loop membership system (HTI Platform) governed by the body of members who co-develop the shared rules (HTI Network):

1. **Training & Access Governance (Trail):** The system's training and controls, used to manage training, certification, and onboarding workflows across sectors. Trail certifies users, enforces role-based access, and embeds trust into every interaction.
2. **Hotline & Reporting Intake (Thread):** A shared intake and clearinghouse system for managing and routing tips, reports, referrals, and hotline activity. Thread is designed for minimally-trained staff to safely route top-of-funnel data into the system without requiring exposure of sensitive survivor information.
3. **Screening & Case Management Tools (PAVE):** A trauma-informed platform for survivor-facing sectors. Helps users assess risk, guide survivors to services, and manage care securely—from first encounter to long-term support.
4. **Investigative Intelligence Tools (LEADS):** Built with law enforcement to detect, triage, map, and disrupt trafficking networks. Processes real-time data to detect connections across data sources, surface leads, support network-based deconfliction, and drive coordinated investigations.
5. **Metrics & Data (Echo):** Captures, de-identifies, and distills system-wide activity to support evaluation, auditing, and learning for continuous improvement. Tracks metrics and referral outcomes and powers grant reports, research, and executive decisions.



Implementation Strategy for a Coordinated System of Identification & Response

HTI Platform powers coordinated cross-sector workflows for identification, collaboration, and reporting.

ACCESS: TRAINED, CERTIFIED

All inputs, outputs, integrations, access, and system interactions are shaped by collective network rules and supported with training.

TRAIN, ENGAGE, ADMINISTER
Built for: Stakeholders, admins, HT community

TRAIL
CERTIFIED ACCESS.
TRAINING.
ONBOARDING.

Certifies users for access & onboarding. Ensures system-wide safeguards are set-up and followed.

Builds a trained HT community

TIPS, LEADS, CALLS

Gather first signals and route directly into system with as raw information as possible.

INTAKE GATEWAY: EARLY DETECTION, COORDINATED TRIAGE

GATHER, ALERT, ROUTE, SHARE
Built for: HT community, hotline operators, low-barrier data / information entry points

THREAD
CONNECT-SHARE.
ROUTE.

Intake gateway and clearinghouse to funnel and manage tips, reports, and hotline activity **into and across network.**

Access Point:
Outside Data / Information

INTERACTIONS WITH VULNERABLE POPULATIONS

Embed generalized screening and search tools into agency record management systems. Leverages risk algorithms and next steps recommendations.

COMMUNITY-BASED RESOURCES & RESPONSE

hti labs
Platform Intelligence

- CONNECT
- COLLECT
- ANALYZE
- ALERT
- ROUTE
- BROKER
- TRACK

SCREEN, SUPPORT, REFER, ASSESS
Built for: VSPs & mandated reporters

PAVE
SURVIVOR-CENTERED
NAVIGATION.

Screen, respond, connect as a community. Assess risk, guide survivors to services, & manage care securely, collectively.

Supports a coordinated, collaborative, network of services.

IDENTIFICATION, INVESTIGATION, SUPPORT

Specialized (HT-dedicated and trained) groups use PAVE (victim service providers) and LEADS (law enforcement) directly as their day-to-day system, with supportive integrations.

COLLECT, INVESTIGATE, DISMANTLE
Built for: Law Enforcement

LEADS
INTELLIGENCE-DRIVEN
INVESTIGATION.

Investigate & build intelligence with all-source data discovery, integration, deconfliction, and analysis.

Creates a criminal intelligence exchange for collaborative investigations.

METRICS: TRACKED OUTCOMES

Information leaving the system is tightly controlled to remain compliant and adhere to member-specified sharing decisions. De-identified data and de-duplicated metrics available based on reverse engineering tests.

LEARN, IMPROVE, REPORT
Built for: Stakeholders, administrators, auditors, policymakers, & R&D

ECHO
METRICS. AUDITING.
LEARNING.

Supports evaluation, reporting, and learning, ensuring long-term visibility into how the system is being used and making an impact.

Access Point:
Network-wide Data

See *Section II: Policy Report & Recommendations* for how each sector engages with these tools and workflows. For more on HTI Platform applications, see *Section I: Introduction & Vision*.



Phased Implementation Plan & Rollout

❖ Key Concept:

Implementation is designed in sequenced phases. Each phase brings new user groups into the system while reinforcing safeguards, training standards, and governance protocols.

Phase 1: **Foundation & Governance**

Establish statewide governance, map current systems, and define platform standards.



Phase 2: **Core System Launches**

Launch first production systems with certified providers and law enforcement partners, while formalizing the compliance, training, and certification logic required to scale.

Phase 3: **Interoperability & Expansion**

Expand platform interoperability and information-sharing capabilities across systems and states. Launch de-identified reporting, records management system pilots, and dual-certified provider workflows.

Phase 4: **Scaling & Sustainability**

Transition to full-state coverage with additional sectors (e.g., healthcare, schools, finance) and long-term governance for metrics and policy evolution; platform is statewide clearinghouse for all human trafficking-relevant data, tips, and reporting.

Technical Safeguards & Compliance

Every layer of the system is designed for legal defensibility and victim-centered protections. Key safeguards include:

- **Role-Based Access:** Users only access what they are trained and authorized to see. All inputs, outputs, access, and system interactions are governed by defined rules and certification.
- **Data Sensitivity Tiers:** Information is governed by risk level and use case.
- **Audit Logging & Enforcement:** All activity is traceable; misuse is preventable and actionable.

❖ Key Concept:

HTI Network oversees compliance with federal and state standards, including Oklahoma HB 4210, VAWA, OAC Title 75:30, CJIS, and 28 CFR Part 23. This is made possible because of the closed-loop architecture. It ensures sensitive or individual client-level data is never exposed to uncontrolled environments. This structure is vital to system success. This allows for secure and controlled expansion across the state, its various response sectors, and allows secure intake from outside data sources, as well as potential third-party integrations.



These safeguards address crucial challenges that have historically blocked community progress:

- VAWA & FVPASA compliance requires strict control over what data leaves the system—especially any row-based or otherwise victim-identifiable data.
- The more infrastructures data touches, the harder it becomes to maintain survivor confidentiality and compliance.
- De-duplication and data tracking are essential for useful aggregate statistics—but they require technical precision and strict governance to avoid unlawful exposure.

Policy Report Recommendations

❖ Key Concept:

After analyzing the existing actors, workflows, and policies within the state of Oklahoma throughout six months of live stakeholder sessions, tool demonstrations, and site visits, we understand the challenges, gaps and chronic system pain points. This revealed the necessary precision that will be required in order to implement this system effectively. The following recommendations are a summary of what will be needed in order to achieve the stakeholder vision.

For the full details, refer to *Section II: Policy Report & Recommendations*.

Screening & Response Protocols

- The system needs graduated, universal, and cross-sector screening.
- There is a need to further understand the workflow and protocols of the CWS and how minors touch any point of the system.

Tool Adoption

- Extensive integrations break down system effectiveness and compliance safeguards. This emphasizes the need for a closed-loop system which restricts membership without restricting the integration of other data sources or additional tools.
- Utilizing HTI Platform's applications allows for consistent metric tracking, coordinated response efforts and secure workflows for each player in the system response. This includes overall training, system metric overview, report streamlining, and daily use tools in the hands of frontline response professionals.
- The top priority is PAVE and LEADS implementation for human trafficking-specific personnel.

Governance & Oversight

- Formal workgroups play a key role.
- Training and certification curriculum plays a key role.
- Complex regulatory environment requires methodical rollout and design.
- There is a need to better understand how the auditing concept should be addressed—how will we empower the appropriate workgroup with system auditing capabilities?



Path Forward

❖ Key Concept:

With Phase 1 complete, Oklahoma is ready to move forward with implementation. Phase 2 is set to begin in late 2025 with legislative support and a clear implementation roadmap.

This report provides the shared policy recommendations to guide the next steps. As we scale the system, Oklahoma will lead the nation in protecting victims, holding offenders accountable, and transforming fragmented responses into a coordinated, secure, and effective strategy.

For the full policy report and recommendations and governance rules, see the accompanying report.



I. Introduction & Vision

Vision, Values, & Foundations
for a Survivor-Centered, Legally
Defensible System



1. INTRODUCTION

Vision, Values, & Foundations for a Survivor-Centered, Legally Defensible System

The Oklahoma Human Trafficking Data System represents a foundational transformation in how the state identifies, responds to, and prevents human trafficking. This report documents the shared vision, implementation strategy, and governance model for creating a secure, survivor-centered, and compliance-ready platform that can be used across sectors.

The Office of the Oklahoma Attorney General (OAG), in collaboration with the Oklahoma Coalition Against Trafficking (OCAT) and HTI Labs, will steward a shared vision: to build a secure, actionable, and survivor-centered statewide data system that meets state and federal requirements while prioritizing trust and privacy.

★ WHAT'S INCLUDED:

This section outlines the shared vision behind the Oklahoma Human Trafficking Data System, the core problems it will address, the values that guide its design, and the platform architecture that supports implementation.

2. DEFINING THE PROBLEM

Fragmentation, Under-Identification, and the Absence of Coordinated, Certifiable Screening

❖ Key Concept:

The identification of and response to human trafficking poses enduring challenges for victim service providers (VSPs), law enforcement, child welfare services (CWS), and healthcare systems. These difficulties arise not from lack of victim contact, but from trafficking's multifaceted nature and the isolated way systems manage information.

Key challenges include:

- **Disclosures are rare and take time:** Many victims do not self-identify or disclose their experiences. This is not a failure of character, but a reflection of the manipulation and trauma they've endured—often without fully realizing the extent of their exploitation.
- **Trafficking hides in plain sight:** The signs are often visible only in retrospect, once multiple red flags have been connected over time and across agencies.
- **Information silos mask it:** Fragmented systems mean that professionals may notice isolated concerns, but lack a shared pathway to flag, escalate, or connect the dots.
- **Without certifiable screening infrastructure,** these cases fall through the cracks. Systems lack the shared mechanisms required to identify trafficking consistently, verify concerns, or escalate response.

Human trafficking thrives on manipulation, dependency, and coercive control. Traffickers exploit vulnerabilities (e.g., housing insecurity, substance use, prior abuse) and use threats, or even criminal records to exert power. This control is deeply personal and intentionally obscured and is often related to generations of abuse. The result is that:

- Victims may not recognize they are being trafficked (or may view their situation as normal).



- Professionals may misinterpret behaviors as defiance or delinquency.
- Investigative efforts stall in the absence of coordinated leads.

These dynamics require a system of **collective identification** where professionals across sectors can screen for risk, share insights, collaborate and coordinate services, and escalate concerns within a protected, certifiable infrastructure. Without this, the state will continue to miss key opportunities to intervene and support victims early.

❖ **Key Concept:**

Recognizing this need, the Oklahoma Legislature passed HB 4210 (Oklahoma Legislature, 2022), which established the Human Trafficking Response Unit within the Office of the Attorney General. The Unit is tasked with facilitating a system of collective identification through a centralized data-sharing mandate:

There is hereby created within the Office of the Attorney General the Human Trafficking Response Unit, which shall:

Maintain data in a central location on human trafficking that shall be shared with law enforcement, criminal justice entities, social service agencies, and victim services programs and document information including, but not limited to, offenders, locations, victims, types of trafficking, and trafficking techniques.

(Oklahoma Legislature, 2022)

The Oklahoma Human Trafficking Data System has been designed to meet these requirements.

3. PURPOSE OF THE REPORT

This report maps the strategic plan for adapting the HTI Platform in a manner to fulfill the requirements of the Oklahoma Human Trafficking Data System and support the state's trafficking identification and response goals.

The system addresses the gaps between initial red flags and prosecution, providing a scalable, cross-sector model for thorough screening, safe referrals, and long-term coordination. Oklahoma will close critical gaps, increase identification, and disrupt trafficking networks using the HTI Platform.

This report highlights how the system is designed to the advantage of both the users and the state. Under HTI Network, all sectors, including victim service providers, law enforcement, child welfare services, education, healthcare, and others on the front line, operate under a shared playbook with embedded safeguards for confidentiality, access control, and accountability.

4. LEGAL & POLICY CONTEXT: GUARDRAILS THAT SHAPE THE SYSTEM

Why this methodical system is needed, and how it aligns with federal and state law.

The Oklahoma Human Trafficking Data System must operate within a complex legal environment that is shaped by overlapping federal and state mandates that protect survivor privacy, regulate law enforcement intelligence, and define the responsibilities of different service sectors.

**❖ Key Concept:**

These rules are not abstract ideals; they are binding constraints that shape how identification, referral, investigation, and documentation are conducted across the state.

Mandates Referenced:**Federal**

- **Violence Against Women Act (VAWA)**
Protects the confidentiality and safety of survivors by restricting disclosure of personally identifying information without informed consent.
- **Trafficking Victims Protection Act (TVPA)**
Establishes federal definitions of trafficking and authorizes grants and programs to prevent, protect, and prosecute, encouraging multi-agency coordination.
- **Family Violence Prevention and Services Act (FVPSA)**
Requires strict confidentiality protections for survivor data and prohibits disclosures without informed, written consent, impacting how service providers collect, store, and share information within coordinated systems.
- **Criminal Justice Information Services (CJIS) Security Policy**
Security Policy Governs criminal justice information systems and requires strict access control, audit trails, and data integrity for law enforcement investigations.
- **Code of Federal Regulations, Title 28, Part 23 (28 CFR Part 23)**
Governs criminal intelligence records systems funded by the U.S. Department of Justice. It establishes operational standards for collecting, storing, and disseminating criminal intelligence while protecting individuals' privacy and constitutional rights (ex: periodic data validity reviews; "right-to-know" and "need-to-know" standard).
- **Health Insurance Portability and Accountability Act (HIPAA)**
Sets national standards for health information privacy, affecting data that may emerge in medical or behavioral health screenings linked to trafficking response.

State

- **Oklahoma Administrative Code Title 75, Chapter 30 (OAC Title 75:30)**
Establishes operational and documentation requirements for certified programs serving adult victims of human sex trafficking, including required fields such as medical history, service plans, and screening protocols.

Legislative Drivers

- **Oklahoma House Bill (HB) 4210**
Passed in 2022, this legislation authorizes the Office of the Oklahoma Attorney General (OAG) to coordinate a multi-agency human trafficking data infrastructure. It empowers the state to establish rules, implement a shared data platform, and oversee the secure and compliant handling of trafficking-related information across sectors.

These policies are designed to prevent institutional overreach, protect survivors from re-traumatization, and preserve the integrity of investigations. But in practice, they often produce friction. What enables one sector's compliance can create liability for another. This tension has long been a barrier to unified action.

**❖ Key Concept:**

Rather than avoid these legal constraints, HTI Platform embraces them as design inputs. The work summarized in this report begins with the premise that true cross-sector coordination must be built on rules that are not only legally sound, but enforceable, repeatable, and understood by every user.

The OAG in collaboration with OCAT and HTI Labs developed this strategic plan during Phase 1 of this project. What follows is a shared system vision, the foundational beliefs guiding it, and the high-level architecture for implementation across sectors.

5. SHARED SYSTEM VISION & GOALS

Build a proactive, coordinated, and intelligence-driven system to identify, respond to, and reduce trafficking. One that is centered on victims, powered by data, and sustained by cross-sector collaboration.

Four unified goals guide the system. They do so in different fashion across the various sectors of the Oklahoma human trafficking response community.

SYSTEM-WIDE GOAL	INVESTIGATIVE SECTORS (LAW ENFORCEMENT)	SURVIVOR-FACING SECTORS (VSPs, CWS, CACs)
1. Early and Accurate Identification Integrate screening and intelligence to proactively identify risk and trafficking indicators across all sectors and populations.	Develop all-source intelligence gathering from reports, tips, digital data, and informants.	Identify risk and screen in early through multiple entry points (e.g., shelters, schools, hospitals).
2. Coordinated Response & Support Ensure survivors and at-risk individuals are connected to timely, appropriate services, and interventions.	Triage cases to focus investigative resources, identify key unknowns, and link operations to victim support.	Connect potential victims to comprehensive, trauma-informed services.
3. Coordinated & Efficient Collaboration Prevent gaps, duplication, and fragmentation through shared logic, workflows, and safeguards.	Conduct joint operations, streamline case handling, and ensure law enforcement is aware of existing supports.	Provide consistent information-sharing and referral pathways; reduce duplication of services.
4. Intelligence-Driven Impact & Accountability Reduce reliance on victim testimony, improve outcomes, and disrupt networks through data, auditing, and repeatable learning.	Build long-term understanding of trafficking networks and reduce dependency on victim cooperation.	Document system engagement and outcomes to strengthen understanding of needs.

❖ Key Concept:

To make a lasting impact on human trafficking, it is essential to:

- Identify risk and trafficking early: across all systems, in all populations.
- Connect victims and at-risk individuals: to coordinated, trauma-informed services.
- Work together across agencies: to close gaps, share information, and align on cases.
- Use data and intelligence: to drive investigations, disrupt networks, and guide reform.

Each sector plays a role in all four but with unique tools and responsibilities.



This vision is in motion. Throughout 2025, we partnered with Tactical and Operational Workgroups to map system needs, pilot workflows, develop training content, build technical scaffolding, and begin onboarding agencies. The work ahead focuses on expanding this system in phases, grounded in governance and full scale implementation.

6. CORE BELIEFS & DESIGN PRINCIPLES

The beliefs outlined here are operationalized in Section II (Policy Recommendations).

6.1 Core Beliefs

- **Identification is Essential:** Identification protects public safety, ensures survivors can access the resources they need, and enhances system-wide understanding of the issue. It is the prerequisite to meaningful intervention, prevention, and accountability.
- **Victim-Centered Services Come First:** Every known, suspected, or at-risk individual must receive trauma-informed support without requiring disclosure, cooperation, or system involvement. Safety, dignity, and autonomy are non-negotiable.
- **Ongoing Data & Research Drive Progress:** To evaluate, guide, and optimize anti-trafficking efforts, it is essential to gather, integrate, and analyze data. The system must support real-time analysis, continuous auditing, and validated improvements.
- **Cross-Sector Collaboration is Essential:** Trafficking is often a network-based crime that crosses sectors. No single agency can solve it alone. System-wide coordination is essential to close gaps, reduce duplication, and protect victims (while creating coherent support processes for them). This requires trust, effort, time, and a forum to discover, address, and resolve pain points.
- **Local Control, Shared Guardrails:** Decisions are best made locally, with individuals / agencies retaining control over how they use HTI Platform, but shared expectations for privacy, interoperability, and accountability must be met.
- **Confidentiality Must be Legally & Ethically Defensible:** Authorized access on a need-to-know basis; survivors' information must be protected through informed, written, time-limited consent. All system logic must prioritize data privacy and adhere to applicable regulations, including VAWA, CJIS, and 28 CFR Part 23.
- **Law Enforcement Support is Critical:** There is a downstream effect to dismantling trafficking networks and holding traffickers accountable. Victims and survivors begin to feel more safe, engaging in services and stepping into healing. Trust is built, which translates to increased anonymous reports and threads to follow up on.

6.2 Corresponding Guiding Principles

- **Survivor-Centered & Confidential:** Privacy, dignity, and safety must lead every system decision, especially for vulnerable populations.
- **Legally Defensible:** VAWA, CJIS, 28 CFR Part 23, and OAC Title 75:30 shape every technical decision.
- **Operationally Sound:** Tools should fit into existing workflows and enhance, not disrupt, daily use.
- **Data-Informed:** Metrics, audit trails, and system feedback loops are built in from the start to ensure traceable, validated impact.
- **Cross-Sector:** System logic must support coordination across agencies with different roles, priorities, and regulatory obligations.



- **Role-Based & Certifiable:** Access is earned through clear training, onboarding, and enforcement mechanisms—never granted by default.
- **Phased & Auditable:** Implementation occurs in structured phases with traceable benchmarks, stakeholder feedback loops, and built-in safeguards.

These core design principles set the foundation for the detailed recommendations in Section II, and directly inform the platform architecture, user roles, and safeguards described in Sections II and III.

7. PLATFORM & NETWORK MODEL

The OAG is the steward of the Oklahoma Human Trafficking Data System. As partners, HTI Labs provides the platform that serves as the primary tool of this system.

The Oklahoma Human Trafficking Data System is not a single tool. It is a standards-aligned platform and network.

- **HTI Network** is the governance framework that defines how organizations interact, what data is shared, and how trust is maintained.
- **HTI Platform** is the technical foundation that supports apps, data-sharing, access controls, identity management, and role-based permissions.

Together, they power the launch and operation of five core applications:

1. **Training & Access Governance (Trail):** The system's structural gateway used to manage training, access certification, and onboarding workflows across sectors. Trail certifies users, enforces role-based access, and embeds trust into every interaction.
2. **Hotline & Reporting Intake (Thread):** A shared intake and clearinghouse system for managing and routing tips, reports, referrals, and hotline activity. Thread is designed for minimally-trained staff to safely route top-of-funnel data into the system without exposing sensitive survivor information.
3. **Screening & Case Management Tools (PAVE):** A survivor-centered platform that helps identify victims and supports appropriate response. Assess risk, guide survivors to services, and manage care securely, collectively.
4. **Investigative Intelligence Tools (LEADS):** Built with law enforcement to detect, triage, map, and disrupt trafficking networks. Processes real-time data to detect connections across data sources, surface leads, support network-based deconfliction, and drive coordinated investigations.
5. **Metrics & Data (Echo):** Captures, de-identifies, and distills system-wide activity to support evaluation, auditing, and learning for continuous improvement. Tracks metrics and referral outcomes and powers grant reports, research, and executive decisions.



**❖ Key Concept:**

The closed-loop membership system follows a modular, standards-driven model ensuring that sensitive data is protected, external data may be added, referrals are coordinated, and impact is measured while preserving separation of concerns and legal compliance.

This system forms the secure, certifiable backbone of Oklahoma's statewide response infrastructure. The OAG, in collaboration with OCAT and HTI Labs, operationalizes the system via a tiered workgroup structure of cross-sector champions who form an active, ongoing community of practice that stewards, advances implementation, and guides evolution of the system in real time.

8. SCOPE OF THE REPORT

The section that follow outline the system's policy foundations.

- **Section II: Policy & Recommendations** analyzes the research discovery phase and resulting recommendations covering legal mandates, governance models, and sector-specific implementation guidance.

❖ Key Concept:

As Oklahoma launches Phase 2, this work lays the groundwork for a collaborative, survivor-led, and intelligence-driven model where trafficking is no longer siloed but tackled systemically and sustainably.



II.

Policy Report & Recommendations

Laying the Foundation for Legally-Compliant, Cross-Sector Identification and Response



INTRODUCTION

Oklahoma is implementing a first-in-the-nation, innovative statewide infrastructure to detect trafficking earlier, intervene more effectively, and hold offenders accountable while upholding legal safeguards, victim rights, and community trust.

This mission demands a shift from isolated interventions to coordinated response. It requires a system that not only connects agencies, but also protects them: from unlawful disclosures, from missteps, and from acting without context. Most importantly, it must protect the individuals being exploited. The Oklahoma Human Trafficking Data System makes that mission real by equipping each sector with the tools, protections, and access needed to do their job lawfully, securely, and collaboratively.

Phase I laid the foundation—the roadmap, the systems, the standards—that will shape that system. As part of this effort, the Office of the Oklahoma Attorney General (OAG) in conjunction with HTI Labs:

- ✓ Established and stood up the ongoing workgroup structure and roles, with core work undertaken by Operational Workgroups (Policy / Implementation and Technical / Compliance) and Tactical, Sector-Specific Workgroups were formed for victim services providers (VSPs) implementation and Human Trafficking Investigations implementation.
- ✓ Aligned on a shared vision for unified screening, identification, and response to human trafficking.
- ✓ Mapped Oklahoma's trafficking response system, including VSP and law enforcement workflows, reporting and referral processes, and release of information processes.
- ✓ Conducted demos and / or site visits with Phase I partners (VSPs and Human Trafficking Investigators) and set up sandbox environments to PAVE and LEADS to initiate training, gather feedback, and to collect implementation requirements.
- ✓ Developed implementation strategies for an integrated anti-trafficking response system, with strategic direction laid out for data quality controls (role-based training → certification → access), validation (workgroup audits), and framework (rules, structure, people, practice) to support continual learning, implementation, and stewardship.

This section draws from that work to outline a shared vision and provide actionable recommendations for building a trusted, secure, and effective statewide human trafficking data system. There are 3 subsections to the policy report:

Subsection A → Identification & Response System Vision

- Subsection A walks through how the Oklahoma Human Trafficking Data System approaches *screening and identifying trafficking*, how it **breaks down silos** for collaboration, and the **institutional backbone** needed to make it work, including the **data** generated that empowers the network to steer anti-trafficking efforts.

Subsection B → Mapping the System by Sector

- Subsection B *maps this system by sector*, focusing on *roles and policies*. This work will grow sector-by-sector, role-by-role, phase-by-phase, as we build to statewide coverage of all populations, pathways, and systems.

Subsection C → Strategic Plan / Recommendations

- Subsection C addresses strategic implementation and actionable *recommendations*.

A. Identification & Response System Vision

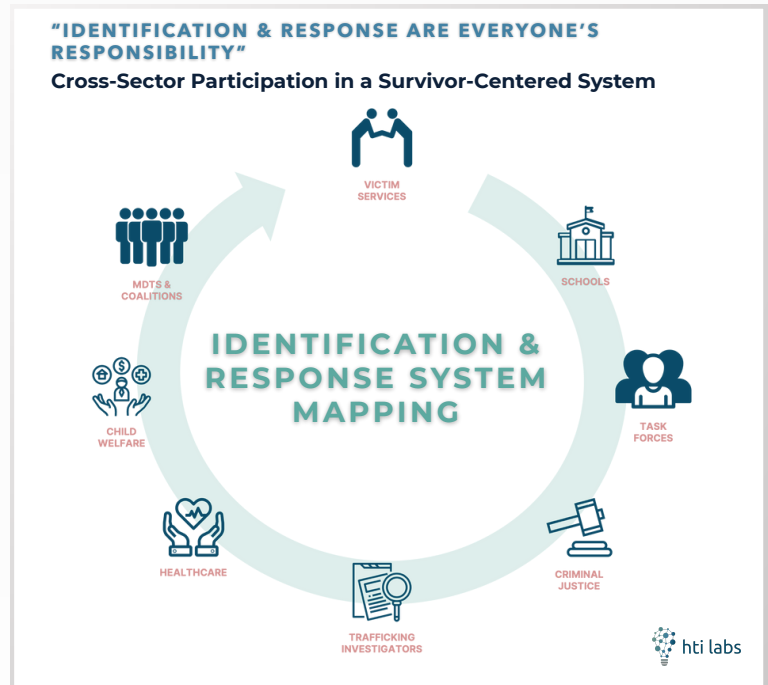
1. FROM INTAKE TO INSIGHT: A SURVIVOR-CENTERED, LEGALLY-GOVERNED PROCESS

Identifying human trafficking is not the responsibility of one agency. It is the outcome of many people acting in concert—each seeing part of the story, each doing their part.

At the core of this approach is a simple principle: **no one agency can do it all, and no survivor should have to do it all.** Screening, identification, and investigation must be shared responsibilities—embedded across sectors, rigorously designed, and survivor-centered by default.

The identification and response system isn't built for any one agency, it is built for the field. That includes law enforcement, victim service providers (VSPs), schools, prosecutors, child welfare services (CWS), youth and criminal justice systems, healthcare, and task force leaders—each with different goals, constraints, and pieces of the broader picture. We will need to develop clear, compliant protocols for data exports, research integration, and anonymization to foster trust and insight across sectors.

To serve this complex landscape, the system must meet these core needs:



NEED	WHAT IT MEANS
Support Role-Specific Workflows	Every user has a unique function. The system must support law enforcement intelligence, VSP case tracking, and public tip triage without forcing one-size-fits-all workflows.
Create a Shared Picture	No single agency can identify trafficking alone. The system must connect dots across roles to reveal the broader truth while maintaining boundaries.
Protect Privacy & Compliance	Criminal Justice Information Services (CJIS) Security Policy, Violence Against Women Act (VAWA), and Oklahoma Administrative Code (OAC) Title 75:30 all apply. The system must enforce consent, limit access, and maintain legal and ethical standards.
Track and Improve Outcomes	It is not enough to record data. The system must help us answer: Was the person helped? Was the case investigated? Were services connected?
Build Trust in the Field	People only use systems they trust. It must earn trust by being usable, responsive, easily accessible, secure, and tailored to the real work in Oklahoma.



1.1 Cross-Sector Roles & Legal Safeguards

To support the field, the system must clarify—from the start—who does what, under what legal guardrails, and with what permissions. The system doesn't ask agencies to compromise their rules, it implements them.

USER GROUP	CORE ROLE IN SYSTEM	UNIQUE LEGAL SAFEGUARDS & BOUNDARIES
Law Enforcement	Lead investigative and intelligence users who initiate and manage trafficking investigations, triage leads, deconflict and coordinate across agencies, and build cases collaboratively via LEADS . (Note: LEADS can integrate with other CMS/RMS.) <i>Oversight: Human Trafficking Investigations Workgroup</i>	Can ingest and act on data from non-consensual sources. Deconfliction protocols (enforced via LEADS) avoid duplicative investigation. Must retain source provenance to meet 28 CFR Part 23. Governed by CJIS. Thread triages incoming tips by role, source, and strength to prevent irrelevant data from entering LEADS. Criminal intelligence exchange (ISAs, SOPs) supports controlled collection, sharing.
Victim Service Providers (VSPs)	Conduct trauma-informed screening, provide services, and make victim status determinations. Use PAVE to screen & manage client records, service needs, & referrals. <i>Oversight: VSP Workgroup</i>	Survivor data is handled with legal silo enforced: no identifiable data leaves VSP workflow without consent (VAWA / FVPSA) or legal override (mandatory reporting). Sole authority to trigger certain high-trust care pathways and export service records.
Child Welfare (CWS), DHS, OJA, MDTs	Screen minors for trafficking risk, document disclosures, coordinate MDT response, and support service referrals.	Access governed by CAPTA and FERPA; must shield minor identity across sectors. PAVE screening tools are customized for child-specific risk factors (e.g., family risk dynamics, history of removals).
Hotline Operators, Public & Anonymous Reporters	Submit tips, calls, reports via Thread ; route top-of-the-funnel risk signals. Manage hotline calls with basic intake. (<i>Low-barrier access and collection.</i>)	Cannot view existing profiles, records, or platform data. All submissions are one-way and routed through logic-based intake rules. Sends to appropriate agency without exposing sensitive survivor info, while enforcing strict access rules.
Agency + Governance Leaders (OCAT, Workgroups)	Monitor metrics, audits, & adoption via Echo to guide strategy and funding. Administer access, onboarding, training programing, & data-sharing controls via Trail .	Cannot view any live case data unless certified in another role (e.g., as a certified user). Audits and system oversight occur only through Echo (de-identified environment).
Mandated Reporters (Schools, Healthcare)	Submit concerns via PAVE or Thread ; refer to human trafficking-trained network; complete role-based Trail training.	Submissions timestamped and locked (non-revocable). Agency mandatory reporting protocols embedded into system.

→ NOTE:

The rows above highlight what is distinct to each group, not what they share. Universal safeguards like audit logging, role-based access, and Trail certification are not repeated in the table.

By clarifying these boundaries from the start, the system offers protection as much as it offers access. Identification and response are no longer siloed—but they are not a free-for-all either. Every interaction is accountable, every role has a purpose, and every safeguard is embedded into the architecture itself.



1.2 Built for the Frontline, Evolved by Use

The system is rolling out in phases, with each phase grounded in user codesign. Workgroups define real use cases, stress-test workflows, and validate protections before each module goes live. This ensures that implementation is not a top-down mandate, but a **bottom-up infrastructure built by and for Oklahoma communities**.

Over time, new needs will emerge: new user types, new governance rules, new oversight mechanisms. The modular, evolving architecture ensures Oklahoma can adapt without compromising safety, trust, or legality.

This is not just a technical system. It is a living structure that redefines how a state sees trafficking, acts on it, and protects everyone involved in the process.

1.3 Compliance Challenges & Resolution Strategy

Oklahoma's legal obligations (VAWA, CJIS, OAC Title 75:30) often discourage information and data-sharing. But failure to share data (or doing so without safeguards) can result in missed victims, repeated victimization, and legal liability.

In many cases, one agency's compliance requirement creates another agency's legal exposure. Cross-sector collaboration introduces inevitable tensions. For example, VAWA protects victim records from disclosure (even to law enforcement); 28 CFR Part 23 enforces collection and retention policies (requiring the ability to assess source and validity).

To solve this, HTI Platform introduces several layers of protection:

- **Role-based access** that gates what data is visible and when;
- **Consent and service status** tracking for every record and action;
- **Audit logs and permission hierarchies** aligned with sector-specific regulations.

Together, these tools allow data to move legally, intentionally, and transparently—resolving decades of tension between privacy and proactivity.



CORE GOAL FOR IDENTIFICATION & RESPONSE IN OKLAHOMA:

A system that **connects screening, specialized assessment, and investigative response across sectors** without compromising survivor safety, legal protections, or investigative integrity.

2. COORDINATED SCREENING & IDENTIFICATION: HOW IT HAPPENS ACROSS THE SYSTEM

“One Story, Streamlined, Certifiable, Shareable”

◆ System Design Principles:

- Ensure survivors tell their story once (not over and over again), are screened and supported **based on risk** (not arbitrary levels), and are referred through **clear, protective pathways** (not casual handoffs).
- Each case is documented once, but in an ongoing way to account for information across a lifetime. The information is captured consistently, verified through formal processes, and shared securely across sectors only when appropriate and **with survivor consent**.

This enables **“One Story, Streamlined, Certifiable, Shareable”** as a core operating principle.

SHARED GOALS FOR COORDINATED SCREENING, IDENTIFICATION, & RESPONSE



Graduated Screening

- Ongoing community process
- Screening occurs over time as services are provided



Early Detection of Risk

- Screening at all points of contact (not just intake)
- Proactive criminal intelligence collection
- Identifying victims → victim service providers
- Identifying perpetrators → law enforcement



Collective but Controlled Detection

- Risk aggregates
- Traceable “why”
- Reporting what’s possible

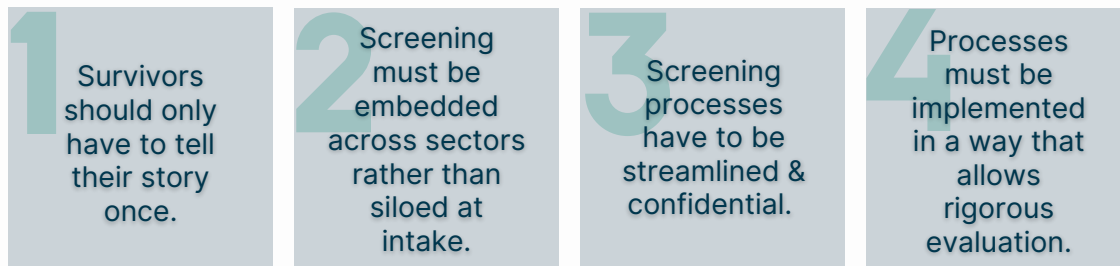


Clear Decision-Makers

- Referral to human trafficking-trained victim service providers for specialized assessment
- Actionable offender-focused leads shared with law enforcement from trusted sources

Screening and detection are layered, intentional, and occur across time, not just at intake.

SURVIVOR-CENTERED APPROACH



2.1 Screening Process Requirements

- Make trafficking indicators visible earlier.
- Support referrals and investigations without breaking confidentiality.
- Prevent survivors from being re-traumatized by repeated interviews.
- Support gradual accumulation of information, rather than requiring a single disclosure moment.
- Respect sector-specific limits and avoid premature or forced identification.
- Enable feedback loops so earlier clues can be reconsidered in light of later findings.



2.2 Unified Tools to Flag, Prioritize, & Investigate: All Populations & Settings

Screening tools must help professionals identify, prioritize, and investigate potential trafficking in their normal workflow, equipping each role—from hotline staff to prosecutors—with decision support tools to recognize risk and to know what next steps should be (for their legal and operational context). Each professional should screen based on their role, training, and access.

Tool Requirements

- **Generalized screening tool for all populations & settings**, including: labor and sex trafficking, domestic and international, system and non-system involved, effective across demographics
 - Conducted as universally as possible to triage risk
 - Built for anyone encountering victims of human trafficking (and related exploitation)
 - Identify *potential* trafficking victims by turning observations & information into trafficking risk automatically
- **Specialized assessment with validated tool providing discretion** for human trafficking-trained VSPs
 - Leveraged to determine whether and how the situation meets the definition of trafficking
 - Supports without supplanting determination; *assessment tool must allow for subjective decision-making*
- **All-source criminal intelligence system** acting as unified clearinghouse for all tips, reports, & leads
 - Conducted as universally as possible to triage risk
 - Requires a focus on source, validity, and actionability
 - Build for law enforcement and crime analysts

2.3 The Graduated Screening Model: From Clues to Confirmation

Identification should not rely on a single test, definition, or disclosure. It should follow a **graduated screening model**—where a range of frontline professionals can recognize risk and pass on concern, even if they cannot formally determine trafficking on their own.

Casting a Wide Net

Effective identification of violence and exploitation comes when **casting a wide net** by screening universally at intake *regardless of suspicion or self-identification*. High risk situations are identified sooner and services are provided to victims earlier.

It is important to note that no current system has 100% efficacy in identifying victims of human trafficking. However, with this system, our goal is to identify as many as possible and to get them to needed services effectively and efficiently.

Screen-in at Any Point in the Process

Screening doesn't just happen up front. It must be possible **at any point in the response process**—whether someone walks into a shelter, is pulled over in a traffic stop, is seen in the emergency room, or is interviewed during an ongoing investigation.

That's why we treat **identification not as a single event**, but as something that occurs along a timeline—a continuum of recognition, documentation, and response. Each interaction is an opportunity for a new professional to observe signs, revisit past reports, connect information, or elevate the case.



Risk Builds Based on Repeated Interactions

Graduated screening is based on repeated interactions, meaning that red flags should aggregate over time (from screens, intake information, and all-source data available to the professional) to provide a **collective** concept of risk and alert when escalation is needed.

Routine observations can compound to create lifelines for victims otherwise overlooked.

From Risk to Identification

The goal with screening is to get to an official determination of trafficking in a safe setting so that survivors don't need to re-tell their stories, eliminating the need to over-screen unnecessarily.

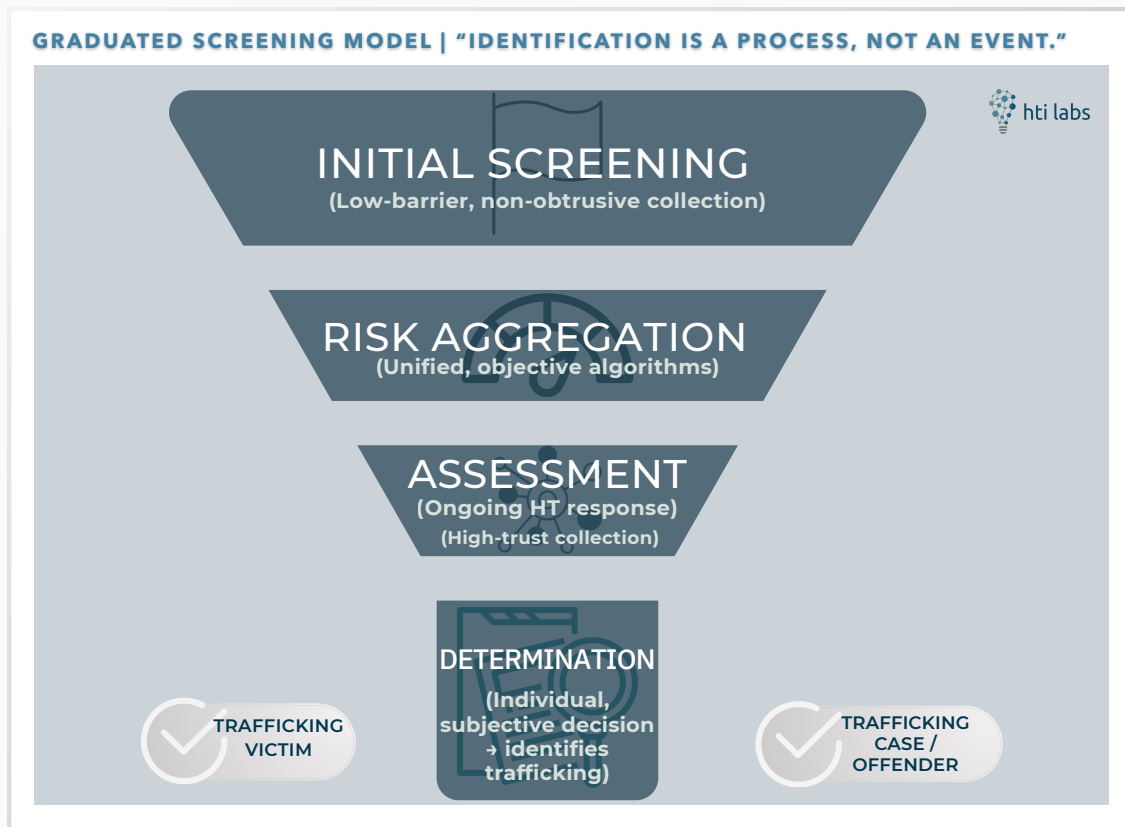
This is why high risk victims are **referred to trauma-informed professionals** who can assess the situation more deeply, as relevant services are being provided and trust and rapport is built. *This is a key role for human trafficking-certified VSPs in Oklahoma.*

(Depending on the age and circumstance of the potential victim, escalation may kickstart a Multi-Disciplinary Team [MDT] response, if not already initiated. High risk cases, or perpetrator data / information, are reported to human trafficking dedicated investigators with access to collective intelligence.)

Walking through the Model:

How HTI Platform Facilitates Graduated Screening

The Platform facilitates this graduated screening model by matching screening depth and data access to the user's role, training, and legal authority. The Graduated Screening Funnel illustrates how raw information flows into the system to early contact points, and how actionable insight flows out through certified, role-based decision-making:





1. Initial Screening: Broad, Embedded, & Observation-Based

Top-of-funnel screening tools are embedded across victim services, healthcare, shelters, and eventually schools. These tools are generalized and observation-based, allowing any trained user to document surface-level concerns without requiring disclosure or mandatory follow-up.

PAVE Initial Screens convert these observations into red flags that align with system-recognized indicators of violence or exploitation.

LEADS automatically processes tips, reports, and digital data to generate red flags-based on OSINT patterns in online commercial sex ads. This includes identifying networks, enabling two-way deconfliction (e.g., a missing red flag in one case tied to another known trafficker), and escalating leads to appropriate investigators through role-based access controls.

STRATEGY

Embed screening tools within agency systems. Thread routes data into the platform, surfacing red flags while preserving confidentiality.

2. Risk Calibration: Accumulating Threat Indicators Over Time

PAVE and LEADS aggregate red flags in real time, surfacing evolving patterns that may not be visible in a single interaction. The system uses these red flags to calibrate a victim's risk level and suggest next steps based on user role and context.

STRATEGY

- **Victim services-side | PAVE:** Assesses accumulated red flags to guide next steps or initiate further assessment.
- **Investigation-side | LEADS:** Aggregates red flags from OSINT and investigative data to model risk (e.g., working all hours, flagged ads, geographic movement) and support escalation.

3. In-Depth Assessment: Conducted by Certified Human Trafficking-Trained Providers

When concern reaches a defined threshold, certified victim service providers conduct an In-Depth Assessment using validated tools that are trauma-informed, confidential, and calibrated to state certification standards (e.g., OAC Title 75:30). This process may span multiple encounters, depending on trust and service need.

STRATEGY

Certified users access PAVE directly while LEADS offers a Trafficking Risk Assessment Tool for Investigators. In-Depth Assessments are recommended for VSPs to reach a determination.

4. Victimization Determination: Survivor-Centered & Defensible

The final step in the funnel is the formal determination of victimization status, which may unlock specific services, legal protections (e.g., T-visas), or collaborative investigation. This determination is made by certified professionals and recorded within the audit-ready platform.

STRATEGY

Role-based access rules govern case determinations and oversight. Echo then provides de-identified aggregate data, such as the number of identified victims, to support state decision-making.



The Platform supports multiple screening pathways tailored to each trafficking event, user's role, and guided by a Graduated Screening Model that casts a wide net to include both minor, juvenile, and adult victims through building insight over time.

By embedding screening at every point of contact, the system enables early detection through repeated interactions where risk indicators accumulate and sharpen. Identification is not a single moment or disclosure; it is a structured, multi-phase process that surfaces risk gradually across repeated interactions.

Information flowing into the funnel is structured for real-time analysis and legal filtering. Information flowing out of the funnel follows member-defined protocols, ensuring that sensitive data is shared only when necessary, and always in a way that protects survivors.

Many information-sharing and reporting mechanisms rely too heavily on a snapshot in time, which does not tell the whole story.

↳ **Example: Sex industry experiences and the continuum from agency and exploitation - separate entry vs. current circumstances**

- A person who started in the sex industry as a minor was trafficked into the industry, whether or not their circumstances for remaining are different.
- Regardless of whether they are currently being trafficked, if they have ever experienced trafficking then they may need services and are eligible for them.

↳ **Example: Recurring and overlapping victimization status**

- It is also not uncommon for a survivor to have multiple trafficking episodes in their lifetime (by the same or multiple traffickers) or to be the victim of multiple crimes at overlapping points in their life.

❖ **Key Concept:**

1. The re-victimization and re-perpetration patterns common to trafficking highlight the need to track victim status and trafficker activity across a lifetime.
2. This fluidity of victimization status over the course of a lifetime means that it is crucial for screening processes to be accessible at any point during an individual's experience.

3. BREAKING DOWN SILOS

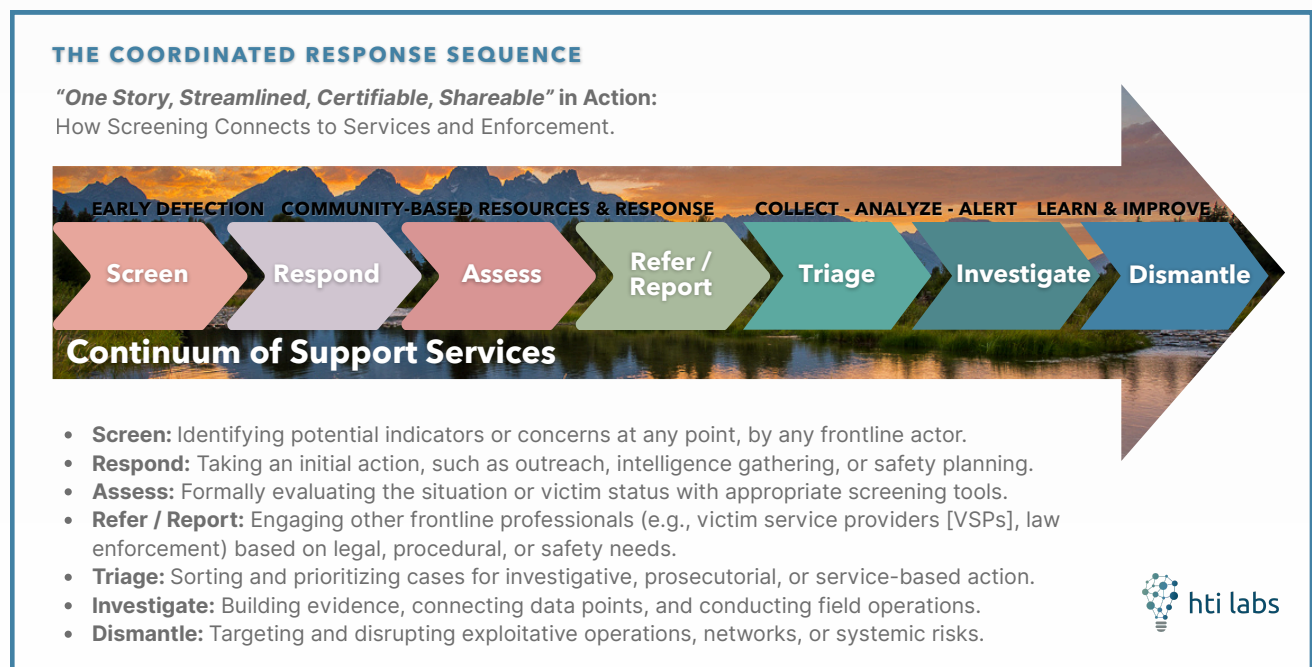
One System, Many Doors: A Coordinated Path Forward

◆ System Design Principles:

- Identifying trafficking requires long-term support services and a community working together, which requires collaboration tools.
- While immediate self-disclosure of trafficking is rare, it does become possible when individuals are connected to vital services where their basic needs are met.
- It is important to know when to escalate to a deeper response. But to get there, clearly mapping **who plays what role in the sequence** and what Oklahoma-specific requirements, authorities, and constraints guide their participation is essential.

3.1 A Continuum of Response

In Oklahoma, the system response must be a flexible but structured sequence of actions. This sequence is not rigid or prescriptive; **cases can enter or exit at different points, depending on how they arise**. But for a functional system, each of these steps must be visible and documented. All of this requires the deconstruction of silos between agencies and across sectors.



This sequence mirrors how real cases unfold—not in a straight line, but with movement forward, back, or sideways as new information emerges. For example:

- A **services-first case** might move from “Screen” to “Respond” to “Assess,” and remain within VSP systems.
- A **LEADS case** might originate at “Investigate” through proactive data collection, then circle back to “Assess” and “Respond” after victim contact.



Guided Collaboration for Sensitive Cases

A statewide human trafficking response system isn't about one agency doing it all. It is about each sector acting at the right time, with the right boundaries.

Oklahoma's approach prioritizes controlled collaboration under sensitive, often high-stakes conditions. The Platform reduces the burden on frontline professionals by embedding guardrails and surfacing appropriate workflows automatically.

It doesn't just block non-compliant behavior—it empowers professionals with the clearest, most effective way to act.

3.2 How the System Enhances Response through Collaboration Across Sectors

The System deconstructs silos in order to facilitate collaboration between agencies and across sectors while safeguarding victim rights and legal compliance. This equips professionals with the confidence to use their resources to the full extent that is legal.

Collaboration Between Law Enforcement and VSPs

Secure, Consent-Driven Information-Sharing: When a survivor provides informed consent, VSPs can securely transmit relevant details to law enforcement and receive investigative updates in return.

- Example: Law enforcement may notify a survivor's caseworker that a previously trusted associate has known affiliations with a trafficking network, allowing VSPs to adjust safety planning.

Anonymous, Perpetrator-Focused Reporting: The Platform allows certified VSPs to share perpetrator-related information with trusted law enforcement partners without disclosing any survivor-identifying data.

- Example: A VSP caseworker may recognize a pattern involving a suspected trafficker through multiple client intakes. Even if no individual survivor wishes to work with the legal system, the Platform enables the VSP to flag this intelligence to a trusted investigator—without compromising survivor confidentiality.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

IDENTIFIED STAKEHOLDER GOAL

↳ **Ability for VSPs to share trafficker information to human trafficking-dedicated investigators.**

This is a **key workflow** highlighted in our Phase 1 work. Since OAC Title 75:30 mandates human trafficking-certified VSPs track known perpetrators of their clients (full name, relationship to the client, context of violence, safety risks, etc.), this opens the door for the system to support effective, targeted shares when appropriate.

PAVE supports this functionality in Phase 2, enabling effective collection, storage, and linking of trafficker information within client files. Phase 3 unlocks a more nuanced version of sharing via PAVE's environment, which would support, for example, partial anonymous shares that later turn into full reports (with consent), and controlled, compliant VSP↔law enforcement communication about the case, without revealing the source.



Relevant Statute

Oklahoma Administrative Code: § 75:30-3-1 (e)(7):
“(7) It is the human sex trafficking victim's choice to cooperate with law enforcement...**An organization's cooperation with law enforcement for the purpose of identification and prosecution of known traffickers is permissible as long as the victim's identification does not have to be revealed without their consent...**”

► Key Need

Survivor-Informed Data Sharing & Maintained Survivor Confidentiality



Proposed Recommendation

Allow PAVE to serve as a cross-sector community coordination tool that enables VSPs to directly share offender information with investigative agencies at their discretion.

See Section 2C.3.3: “PAVE Recommendations.”



Collaboration Between Law Enforcement Agencies

All-Source Criminal Intelligence

Exchange: LEADS centralizes trafficking-related leads, tips, and investigative data. By unifying intelligence streams, the platform can support real-time deconfliction across units, agencies, and even state lines.

- **Discovery:** As new data enters the ecosystem, it is automatically processed into discoverable pieces & searched against all existing information (ongoing).
- **Connect:** Alerts users to connections to quickly build out networks.
- **Risk & Mapping:** As data is added, networks & risk automatically update.

STRATEGIC TAKEAWAY



Collaboration Between Victim Service Providers

Coordinated Referrals and Service Planning: VSPs can refer survivors to one another for specialized services, such as housing, legal aid, or mental health support, using survivor-directed consent workflows.

- Example: A survivor receiving advocacy support from one agency may authorize their case file to be shared with a housing-focused VSP, avoiding re-traumatization of needing to re-tell their story each time a new service is needed.

Case Collaboration through Information-Sharing:

Sharing: Sharing settings provide targeted collaboration. PAVE allows users to share specific segments of information through a single point-in-time share or on an ongoing basis for collaboration.

Responding to Co-Victimization: Survivors of trafficking may also be survivors of domestic violence, sexual assault, or child abuse and vice versa. The platform will facilitate multidisciplinary coordination across service silos, allowing agencies to address intersecting needs.

STRATEGIC TAKEAWAY

COLLECTIVE CASE MANAGEMENT

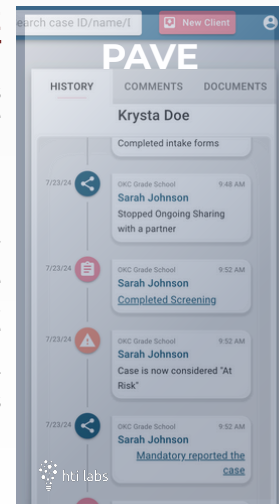
The system provides collaboration software for effective referral making and ongoing provision of services in a protected virtual environment.

PAVE and LEADS have collective case history, showing each step the community has taken with the survivor (subject to what's "viewable" to the user).

Proposed Recommendation

PAVE should serve as the core CMS for certified VSPs, ensuring aligned standards, streamlined compliance, and consistent survivor support. Deployment should begin with certified providers.

See Section 2C.3.3: "PAVE Recommendations."





★ OKLAHOMA DISCOVERY PHASE ANALYSIS

HOW IT WORKS IN PRACTICE: SUMMARY OF INTAKE SILOS & FRAGMENTATION

Common Intake Point Examples:

- Law enforcement
- Medical (Ascension St. John's Medical Center, Saint Francis)
- Direct hotline calls to VSPs
- Family Justice Centers
- Oklahoma Human Services (OK DHS) approved juvenile service providers

Each of these umbrella entities represent an intake pathway and an access point for particular services. A survivor may need multiple services from various entities and may choose to request those services in any order based on their intake path and personal needs. This reality is aggravated when a statewide system holds inconsistent screening practices & roles.

Inconsistent Screening Practices & Roles

In multiple stakeholder working sessions, it was emphasized that screening practices across the state vary widely depending on the agency, program type, or staff training. While some providers take a broad approach, such as integrating trafficking indicators into general safety assessments, others focus more narrowly on domestic violence or sexual assault contexts.

“Some of our clients are DV, but when we go deeper, they’ve clearly been trafficked. VSPs don’t always ask those questions unless it’s their specific program.” - Certified VSP

The lack of standardized, cross-program screening tools can lead to survivors being overlooked based solely on the doorway through which they initially accessed services. Meanwhile this can also lead to survivors needing to repeatedly tell their story each time they need to access a new service—increasing survivor re-traumatization.

► Key Need

To screen at all touchpoints regardless of trafficking suspicion.



Proposed Recommendation

Support identification by screening at every stage—initial screening, triage, and comprehensive assessment.

See Section 2C.4.4: “Screening, Identification, & Response System.”

From Vision to Action: "Same Page, One Story"

↳ System Health Check; Bottlenecks & Blindspots

This system is not built to be everything to everyone—it is built to help each sector do their job better, with support and clarity to coordinate the bigger picture of the state’s trafficking response.

The guiding principle is simple: everyone on the same page, telling one story. Whether through field intelligence, a referral form, or a tip line call, each contribution strengthens the state’s coordinated response.

That vision becomes infrastructure through policy, rollout strategy, governance, and technology.

4. THE INSTITUTIONAL BACKBONE

Building institutional trust through shared rules, structured oversight, and accountable stewardship

◆ System Design Principles:

- While the HTI Platform provides the secure technical infrastructure, the **HTI Network** serves as its institutional backbone creating an evolving practice of stewardship & feedback.
- The Platform captures, de-identifies, and distills system-wide activity to support evaluation, auditing, and learning for continuous improvement. It tracks metrics and referral outcomes and powers grant reports, research, and executive decisions.






4.1 Why Governance Matters: Building a Trusted System

The Platform and Network provide not only the infrastructure to connect siloed agencies, but also the institutional scaffolding to govern it. Built on shared rules, structured oversight, and a statewide community of practice, this scaffolding is what transforms disparate software tools into a living system; *governance transforms a technical platform into a trusted system.*

Without shared oversight, rules, or accountability, data systems risk becoming fragmented or even harmful. By contrast, a governed platform ensures legitimacy, consistency, and long-term integrity, where every agency plays a role in maintaining the legitimacy and precision of the broader system.

HTI Platform provides the secure technical infrastructure that captures, de-identifies, and distills statewide activity. The Network is the governance model that ensures this framework functions as a shared, community-owned system. Facilitated by the OAG, and carried forward by sector champions, it brings structure to how Oklahoma agencies gain access, earn certification, contribute feedback, and shape oversight.

*The institutional spine of the platform consists of **rules, structure, people, and practice**:*

 01. Define	Rules & Standards (A compliance framework) <ul style="list-style-type: none">• Core Function: Establish what's permitted, required, and prohibited across legal, policy, and platform domains.• Why it Matters: Creates a defensible foundation for access, enforcement, and accountability.	 WHY THE RULES MATTER: Connecting diverse sectors of the response system requires careful adherence to federal and state regulations at every step. Network rules are built to meet complex compliance standards, build trust, and ensure critical information reaches the right people at the right time. They: <ul style="list-style-type: none">• Align how agencies handle sensitive information across sectors and states• Protect survivors while still enabling effective collaboration• Enforce shared responsibilities among all users and agencies• Support local control within a trusted, standardized framework RULES ARE SET AT 4 LEVELS: Network-Level (HTI Core Standards): <ul style="list-style-type: none">• Federal law (VAWA, CJIS, 28 CFR Part 23) and universal data governance and security rules State-Level (State-Specific Rules & Goals): <ul style="list-style-type: none">• State law & trafficking response strategies Member-Level (Agency-Specific Controls): <ul style="list-style-type: none">• Agency-driven policies for internal access User-Level (Individual Access + Audit): <ul style="list-style-type: none">• Role-based access by clearance & training
 02. Uphold	Structure of Oversight & Authority (A structured enforcement body) <ul style="list-style-type: none">• Core Function: Coordinates how rules are applied across levels – platform, state, task force, sector, agency, user.• Why it Matters: Enables decentralized enforcement while protecting coherence across sectors and agencies.	
 03. Participate	A Vetted Member Community (A trusted coalition of users and stewards) <ul style="list-style-type: none">• Core Function: Grants membership only to trained and certified users, with some contributing to rule-making.• Why it Matters: Establishes trust, defines who participates, and ensures aligned implementation.	
 04. Evolve	Stewardship & Growth (A living engine for rollout and learning) <ul style="list-style-type: none">• Core Function: Champions and workgroups guide implementation through training, testing, iterative feedback, and shared learning.• Why it Matters: Ensures the system stays aligned with law, field realities, and evolving needs.	



4.2 How Governance is Built: The Structure Behind the System

The Network operates as a **participatory model** grounded in real-world expertise. At the foundation are codified rules and agreements, set at multiple levels and enforced by both technical and procedural safeguards. These rules govern access, confidentiality, and trust-building between agencies, bringing together agency leaders, sector champions, and frontline professionals through a disciplined, multi-tier governance structure:

Executive Committee: Oversees the full governance framework, approves workgroup activities, and makes final determinations on standards, rollout timelines, and rule adoption.

Operational Workgroups

Policy & Implementation: Consists of “champions” from across key agencies and sectors (e.g., OAG, OCAT, HTI Labs, DHS, OJA, law enforcement, VSPs, CWS, CACs) guiding the rollout of the system, shaping platform architecture, and driving development of shared guidelines and standards (aligned to sector-specific goals).

- Identifies emerging needs and refines rules.
- Shapes how each sector plugs into the platform and coordinates sector-based rollout.
- Audits data quality during early rollout.

Technical and Compliance: Responsible for defining secure data architecture, access limitations, and compliance alignment (e.g., CJIS, HIPAA, 28 CFR Part 23). A third-party cybersecurity expert (DAIS) has been subcontracted to assist.

Sector-Specific Tactical Workgroups

Sector-Specific Tactical Implementation: Each sector forms its own Tactical Workgroup, comprised of frontline professionals who translate system goals into everyday practice. They shape protocol and training development, provide implementation feedback, surface operational challenges, and pass recommendations to the Operational Workgroup. Examples include:

- **Victim Services Workgroup:** Defines certification-linked access standards, oversees training development, and aligns statewide rollout.
- **Investigations Workgroup:** Embeds investigative standards and coordinates training. Periodic review of criminal intelligence database to assess data relevancy, importance, and accuracy.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

INSTITUTIONAL CONTINUITY & COALITION LEADERSHIP

The **Oklahoma Coalition Against Human Trafficking (OCAT)** plays a unique and ongoing role in this backbone. As the state's designated anti-trafficking coordination body, OCAT ensures:

- Survivor-centered practices guide policy.
- Tactical Workgroup leadership is grounded in real-world expertise.
- Long-term sustainability is built through continuity, not just launch.

OCAT leadership served as the Tactical Workgroup leads and project champions during Phase 1 of this project. Their influence has been vital in achieving buy-in, navigating state relationships, and deep sector-specific expertise. OCAT leadership is crucial for long-term sustainability, guiding policy, training, and the selection of prospective sector champions.

This infrastructure strengthens coordination, resources and long-term sustainability.

A system co-owned by the community it serves is more legally defensible, more adaptable, and more trusted.



These workgroups are not advisory; they are rule-making bodies grounded in field expertise. They operationalize the rules, shape new policies, and co-develop training and workflows. They not only anchor implementation, they function as **communities of practice**, sustaining engagement, surfacing edge cases, and building collective intelligence.

Five-Step Implementation Governance Pathway

As new sectors are onboarded, such as CACs, schools, or tribal governments, implementation is governed in a repeatable five-step pathway including:

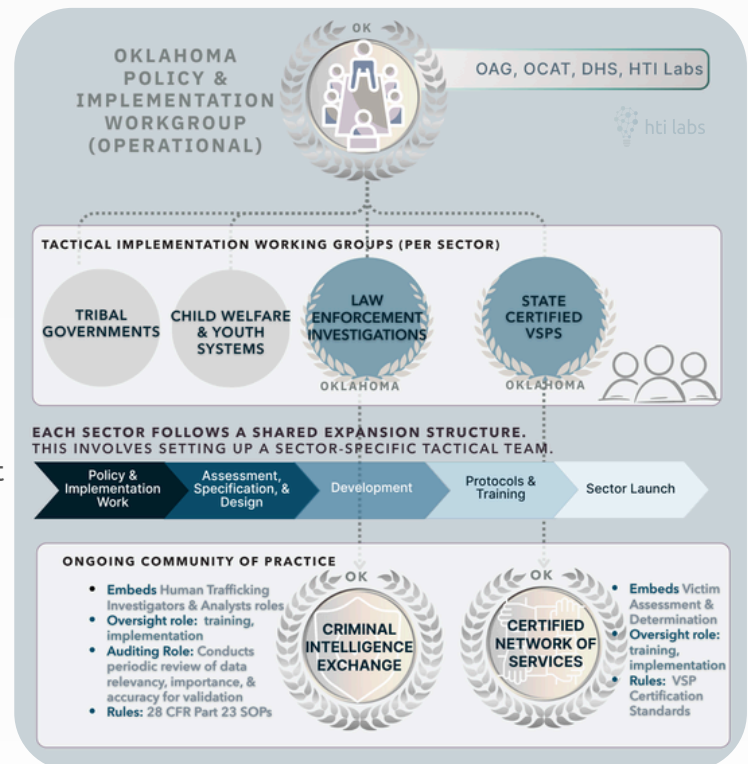
1. Workgroup formation (*sector-specific tactical teams + operational representation*)
2. Needs and workflow assessment
3. Training and SOP development
4. Controlled rollout within live environment
5. Ratification of policies, training, and access standards

Each phase of the rollout is grounded in frontline input and co-design. Workgroups review workflows, test safeguards, and refine roles before each launch. Governance is thus an active, ongoing discipline:

- Each workgroup sets standards for training, screening, and participation.
- Champions and administrators oversee day-to-day onboarding and enforcement.
- Sector pathways define how each role plugs into the system.
- Shared dashboards surface where the system is working or needs reinforcement.
- Rules evolve through formal review and field feedback, not informally or in isolation.

Through sector champions, workgroups, and implementation pathways, HTI Network becomes a space for collaboration, troubleshooting, shared learning, and evolving rules.

This structure ensures that every agency participating in the system is not just a user—they are a steward. They help shape, refine, and own the rules that govern how identification, response, and investigation unfold in Oklahoma.



An active, ongoing community advancing implementation and evolving the system in practice

But perhaps most transformative is what this structure makes possible: for the first time, Oklahoma will have a shared, secure, and compliant mechanism to analyze the **full lifecycle of cases across sectors**—from early identification and screening, through investigation, support, and long-term outcomes.



4.3 Where Governance Lives: Trail & Echo as Embedded Structure

Trail and **Echo** applications embed governance into the platform itself:

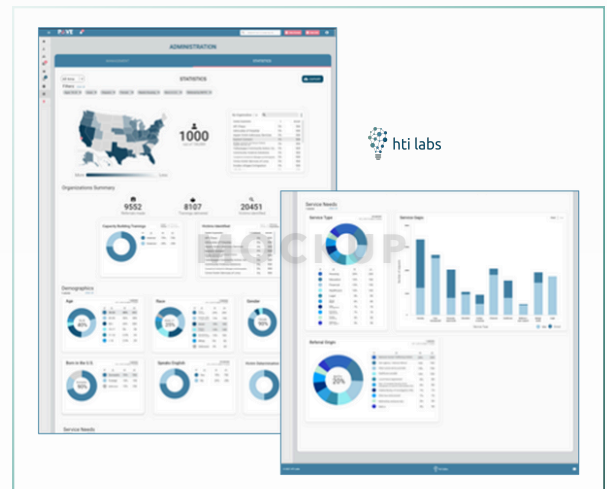
AREA OF OVERSIGHT	MECHANISM
Access & Certification	Trail governs who can access what, when, and under what training conditions
Policy Logic & Rule Updates	Version-controlled workflows with governance approval (no silent changes)
Audit & Metrics	Echo dashboards track usage, adoption, and role-by-role impact
Configuration Management	Governance groups approve policy triggers, access permissions, and workflow revisions

4.4 What Governance Makes Possible: Metrics, Insight, & System Impact

The platform architecture makes aggregate data on human trafficking possible.

HTI Labs' Echo application will support **cross-platform metrics**, enabling both system-wide performance tracking and internal agency reporting for grants and oversight.

These metrics aren't abstract—they represent lived experiences: how many screened individuals were later confirmed as victims; how quickly task forces were able to respond; how many agencies coordinated on a case. With proper safeguards in place, this architecture allows us to **track outcomes**, identify best practices, and adjust course when gaps emerge.



A Backbone for Research & Long-Term Strategy

This also creates a powerful research backbone for Oklahoma and beyond. HTI Labs was founded to address the data gap in trafficking response to unlock deeper research.

This system—carefully designed for privacy, security, and sector-specific needs—can now serve as a clearinghouse for integrated research and insight generation. Each application produces standardized, structured data that flows into a common data environment, where explainable algorithms and ethical analysis can yield insight into what works.

Through shared infrastructure, Oklahoma now has the capacity to:

- **Integrate data across sectors and systems**
- **Conduct de-identified longitudinal analysis**
- **Evaluate system gaps, disparities and outcomes**

HTI Labs serves as the neutral clearinghouse and system integrator, ensuring data flows meet legal, ethical, and technical standards. But beyond compliance, the vision is active: *enabling real-time learning, intelligence automation, and ethical insight that evolves alongside the field.*

This is the heart of the system—not just a platform for response, but a foundation for intelligence. The rules, roles, and applications built atop it are only possible because of this shared, living backbone.



The data generated by the ecosystem permits the community to do research describing the extent of the problem, explain causes, and inform data-driven policy responses.

A Centralized Dashboard for System Metrics

The Platform tracks structured, role-specific metrics linked to case milestones, platform workflows, and real-time usage. These metrics fall into three strategic domains:

↳ Training & Onboarding Metrics

Tracks whether users are onboarded, trained, and authorized to use the platform in compliance with sector-specific standards, enabling training program validation, statewide training progress analysis by sector and depth, and answering: “Who is the frontline anti-trafficking community in Oklahoma, and what is their readiness?”

- **Training Completion & Certification Status:** Monitors user progress through required training modules, linked to clearance and tool access levels.
- **User Onboarding & Role-Based Access:** Tracks how many users are active by agency, role, and sector—ensuring correct permissions and adherence to scope of work.
- **ROI Compliance & Consent Use:** Audits platform-generated Releases of Information (ROI), ensuring consent is obtained and enforced before data-sharing.
- **Workflow Adherence:** Confirms that certified users follow intended workflows, helping validate training quality and SOP alignment.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

IDENTIFIED STAKEHOLDER GOAL

↳ Efficiently align training, adult VSP certification, and access to the system.

Need for Shared Training Knowledge Platform

- Participants reported significant demand for accessible HT certification and training modules, particularly for DV/SA agencies integrating trafficking-focused practices. Rather than individual experts repeatedly giving in-person trainings across the community, a common training platform would reduce duplication, empower sector experts, and provide an easier on-ramp for certification.
- A more accessible training module could create an easier on-ramp to state certification resulting in more agencies to buy into the statewide system and produce a broader picture of data collection.

Importance of Cross-Sector Interaction

- Training should reflect how different sectors work together. Cross-training between VSPs and LE, or VSPs and DHS, can clarify handoffs, expectations, and collaborative protocols. *(For example, this could clarify how these agencies collaborate in supporting older youth and housing solutions for trafficking survivors.)*

Administrative Tracking Challenges

- Current systems often rely on pen-and-paper tracking or siloed records to document training completion. In some cases, agencies maintain separate systems for distinct user groups (e.g., volunteers vs. full-time staff).

► Key Need

A training knowledge platform that provides the training and tracking necessary to support human trafficking certification while also facilitating access to the system.



Proposed Recommendation

Expand HTI Platform to meet these needs by adding 3 standalone applications to the ecosystem suite:

- *Trail:* standardized, system-wide training and completion tracking to reduce administrative burden by tying training to real-time access permissions.
- *Thread:* hotline and volunteer staff with intake and hotline calls, to route the case to advocates, without exposing sensitive survivor information.
- *Echo:* tracks system-wide totals

Empower sector champions to create sector-wide training modules.

See Section 2C.3: “Strategic Plan / Recommendations”



↳ Identification Metrics

*Tracks trafficking risks across touch points and connects to downstream determinations, enabling tool validation, proactive intervention and trend analysis, population size estimates, and answering: “**How many known victims and traffickers do we have in Oklahoma, and where are we not yet identifying trafficking?**”*

- **Screening Volume & Results:** Measures volume of screening occurring across settings (e.g., hotlines, field investigations, shelter intakes). Considers what trafficking risk looks like across contexts.
- **Referral Logic & Outcomes:** Assesses who is being referred, what risk level triggered the referral, and which sectors received the handoff.
- **Vulnerability Pattern Tracking:** Aggregates flags for factors such as prior child welfare involvement, housing instability, missing episodes, or prior victimization.
- **Geographic & Demographic Risk Mapping:** Supports hotspot identification, population-specific trends, and targeting of prevention efforts.
 - *Note that this type of analysis requires extremely careful aggregation to ensure it cannot be reverse engineered in small populations.*

↳ Response & Outcome Metrics



*Tracks how the system responds to flagged risk through survivor support, investigative progress, and institutional accountability, answering: “**What happened? What’s working? What needs to happen upstream to improve downstream outcomes?**”*

- **Service Connection vs. Engagement:** Differentiates between referrals made and services actually accepted or sustained, especially for survivors who decline traditional case management.
- **Investigative Milestones:** Captures validated tips, deconfliction events, triage decisions, case-building activities, arrests, and non-human trafficking charges filed. As the investigation evolves, agents log key milestones (e.g., **interview completed, warrant served, arrest made**).
 - Quantify lead generation by source (e.g., hotline, online data, financial SARs) and track how those leads evolve into cases or actionable investigations.
 - Visibility into patterns of demand and trafficking dynamics, including operational locations, methods of control, and network structures.
 - Operational metrics tied to investigative workflows include:
 - *Victim contact reports (e.g., intelligence reports after stop-and-talks)*
 - *Victim recovery steps (interviews and referral documentation)*
 - *Investigative actions (key searches and hits, connections made; locking down social media profiles, subpoena requests)*
- **Cross-Sector Coordination:** Measures collaboration across law enforcement, VSPs, and CWS, including time to handoff, MDT participation, and dual-tracked services / investigations.



★ OKLAHOMA DISCOVERY PHASE ANALYSIS

SHARED METRICS

Discussion on stakeholder priorities drew out the high-level metrics they would like to see taking shape as the system implements. These metrics allow for operational oversight to measure what is working and what isn't, further bolstering arguments for how adoption should be done and why funding is needed.

IDENTIFIED STAKEHOLDER GOAL

↳ **Track which vulnerabilities were most commonly exploited, and whether and how they were addressed.**

Tracking the Identification & Response Funnel

- Broad interest in tracking movement through the trafficking response funnel, from initial risk indicators to full case substantiation.
- Recognition that the number of individuals screened is an important metric—but that alone is insufficient without understanding substantiation, service connection, and outcomes.

IDENTIFIED STAKEHOLDER GOAL

↳ **Track the type, duration, and outcome of services delivered, not just whether contact was made. Track key investigative milestones.**

Touchpoint Trajectory & Survivor Journeys

- Strong support for metrics capturing the trajectory of survivor interaction with the system (services accessed and system response).
- Several participants highlighted the need to distinguish between basic, preliminary, and essential services (e.g., safety planning, housing referrals) and secondary / long-term services (e.g., legal aid, ongoing case support).
- The concept of “survivor-defined success” emerged as a guiding principle for measuring outcomes.

► Key Need

Use of a unified system across the response funnel. Requires unified:

- Risk indicators
- Services categories
- Identification (determination)
- Referral processes
- Documentation of all system touchpoints



Proposed Recommendation

Maximum adoption and use of Platform applications for key roles throughout the identification and response process.

- *Tactical Workgroups should map key milestones to processes and develop guidelines and required fields around them.*
- *Law enforcement and VSPs should track risk categories over time, even if victim status is already known.*
- *VSPs should track services over time.*

See Section C.3: “Strategic Plan / Recommendations.”

Additional sector-specific goals, metrics, and recommendations are listed in the corresponding sector segment in the next subsection, “Mapping the System by Sector”.

Validation & Auditing: Used for Micro-Level Guidance

At a more granular level, the platform includes robust auditing tools that support governance, ensure compliance, and reinforce fidelity to best practices:

- **User Activity Logging:** Every interaction is tied to a credentialed user and logged for compliance review.
- **De-Identified Test Environments:** Agencies can simulate workflows to test SOPs and validate edge cases.
- **Role-Based Access Testing:** Ensures users can only view the data they are authorized to access.
- **Certification Enforcement:** Only trained users may perform legally scoped actions. Role changes automatically trigger re-evaluation of access permissions.



As adoption spreads, the system creates a standardized, statewide architecture for identifying, tracking, and responding to human trafficking. Through structured training, certification, shared metrics, and auditing mechanisms, Oklahoma gains a long-term, victim-centered infrastructure—one that learns from its data, adapts to its gaps, and supports collaboration across every sector.



B. Mapping the System by Sector

One mission: many roles, all bound by shared safeguards.

A statewide trafficking response only works when every sector knows exactly what it must do, what it may not do, and how its work connects to everyone else's. This subsection distills those boundaries. Drawing on direct input from Oklahoma's victim service providers (VSPs), law enforcement partners, child welfare leaders, educators, healthcare teams, prosecutors, and tribal representatives, we:

1. **Link each sector's daily responsibilities to the governing statutes that shape them,** and
2. **Show where every sector plugs into the larger identification-to-prosecution sequence.**

**GOAL:**

Clarity that *survives real-world pressure* so professionals can act quickly, legally, and in concert.

1. LEGAL STANDARDS & PLATFORM SAFEGUARDS

STANDARD	PROTECTS AGAINST	COMPLIANCE TENSION	PLATFORM SAFEGUARD
Violence Against Women Act (VAWA)	Unwanted disclosure of survivor identity	Requires voluntary, time-limited, signed Releases of Information (ROIs) for any disclosure—even to law enforcement.	PAVE enables consent-aware documentation with granular data controls for time-limited shares. Trail ties training to permissioned access. Thread supports hotline handling without exposing sensitive survivor info & routes to appropriate agency while enforcing strict access rules.
Criminal Justice Information Services (CJIS) Security Policy	Unauthorized access to criminal intelligence	Restricts platform access to law enforcement only; mandates role clearance, certification, and audit trail.	LEADS is gated by CJIS-aligned certification in Trail , with full audit tracking via Echo . Access is granted only to cleared roles with agency sponsorship.
HIPAA	Improper use of health or behavioral-health data	Severely limits re-disclosure, even for investigative or service coordination.	PAVE masks protected health information (PHI) and personally identifiable information (PII) unless an ROI or legal exception applies; Echo captures every PHI view for audit.
Oklahoma Administrative Code (OAC) Title 75:30	Incomplete or improper VSP record-keeping	Mandates sensitive data be stored, yet restricts external sharing.	PAVE keeps VSP data siloed by default; ROI workflow governs any export; Trail hosts required training.
28 CFR Part 23 (Criminal Intelligence Systems Operating Policies)	Investigative profiling or misuse of intel	Prohibits law enforcement from holding data lacking a clear investigative nexus.	Thread filters tips before they reach LEADS ; LEADS auto-flags records for 28 CFR renewal / purge and logs validation reviews in Echo .



2. WHERE EACH SECTOR FITS IN THE RESPONSE SYSTEM

No single agency owns the whole trajectory from “first red flag” to “case closed.” Instead:

- **Screen & Refer:** Schools, healthcare staff, hospitality employees, and other mandatory reporters surface early indicators and route them via Thread or PAVE.
- **Assess & Support:** Certified VSPs and child advocacy centers (CACs) conduct trauma-informed assessments, initiate safety planning, and, only with consent, share perpetrator intel or victim-service status.
- **Investigate & Disrupt:** Law enforcement investigators use LEADS to triage leads, deconflict across jurisdictions, and build prosecutable cases, while respecting VAWA-driven data boundaries.
- **Govern & Improve:** Sector workgroups, OCAT, and OAG track metrics in Echo, refine SOPs, and enforce training and access standards through Trail.



STRATEGIC TAKEAWAY

Alignment in *purpose, participation, and protection* turns disparate duties into a single, defensible system, where each sector delivers its part at the right moment, within clear legal guardrails.

The following sections walk through each sector’s role in further detail.

3. VICTIM SERVICE PROVIDERS

Confidential Care. Consent-First Collaboration.

3.1 Core Focus

Victim Service Providers (VSPs) are the cornerstone of care for trafficking survivors across Oklahoma, offering trauma-informed services that range from emergency shelter to legal advocacy, long-term case management, and emotional support. Their work spans both **system-involved** and **community-based** populations, and their relationships with survivors often last longer than any other sector’s.

At the heart of their work is **confidentiality**. VSPs are governed by federal and state mandates—such as **VAWA**, **FVPSA**, and **OAC Title 75:30**—that strictly prohibit the sharing of personally identifying information without a **time-limited, voluntary Release of Information (ROI)**. This means that even when VSPs recognize the need for cross-agency collaboration, they must operate within the boundaries of survivor-directed care and information control.

This isn’t just a compliance requirement. It is a **moral and relational imperative**. VSPs build trust with individuals who may be fleeing violence, experiencing coercion, or navigating re-traumatization. Violating that trust, even unintentionally, can cause real harm. The system must support them in upholding that responsibility—without making it harder to do their jobs.

3.2 Role in the Identification & Response System

VSPs are often the first to identify trafficking—not because they ask the right questions on a form, but because survivors reveal their stories gradually, in relationship. Their role in the system includes:



- Screening at-risk populations and conducting trauma-informed assessments
- Providing immediate safety planning and support (e.g. shelter, transportation, legal navigation)
- Making time-limited referrals to trusted partners when appropriate
- Offering anonymous tips to law enforcement (without survivor identifiers unless legally permitted)
- Coordinating care across programs while keeping survivor information protected

This role is both active and protective. VSPs connect survivors to services, but they also act as gatekeepers to ensure no survivor is exposed or overshared. Their job is to balance urgency with autonomy, and any system they use must do the same.

3.3 Compliance Landscape

VSPs must follow some of the strictest confidentiality standards in the entire anti-trafficking ecosystem:

- **VAWA & FVPSA:** Require survivor consent for any disclosure, even to other providers or law enforcement. ROIs must be time-limited and specific to the purpose of sharing.
- **OAC Title 75:30-3 & 5:** Mandate detailed documentation while prohibiting unauthorized access. Case files must be protected and exports must avoid identifying information.
- **Grant Reporting:** Requires detailed service tracking for funding but must be done using de-identified, aggregated data.

These laws were written to protect survivors from institutional harm—but they also create logistical tension when VSPs need to collaborate. Systems must resolve this tension not by overriding the rules, but by building them in.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

IDENTIFIED STAKEHOLDER GOAL

↳ OAC Title 75:30 Compliance

Case Field Requirements for Minor Screening, Care, and Tracking Accountability

The cycle of generational abuse and re-victimization emphasizes the importance of early intervention screening for youth related to the trafficking world.

VSPs frequently serve dependents of adult clients, providing housing, counseling, and safety planning support for minors. This highlights the need for tools that accommodate the daily notes, referral workflows and other general client management data for the survivor and the survivor's dependents.

- This natural absorption of responsibility also creates **an opportunity to fill a gap in understanding of risk levels for minors** related to the trafficking world via a parent or guardian and what support for them should look like to decrease their likelihood of direct victimization in the future or identify current victimization.
- This is a practical way of identifying high-risk youth and providing a broader understanding of system patterns and metrics.



Relevant Statute

Oklahoma Administrative Code: § 75:30-3-5: (a.1.G);(a.2.C)
Children's Services

“(a)Client records for both residential and non-residential children shall contain...(1.G) Name of adult client's abuser...(2.C)Does the child have contact with the abuser? and (2.D) Is visitation court ordered with the abuser?”



Oklahoma Administrative Code: § 75:30-5-3: (a.1.F)

Record Content - general

“(a)Client records for both residential and non-residential clients shall contain...(1.F) Perpetrator(s) information, if known.”

► Key Need

Inclusion of known perpetrators and dependents in client case records



Proposed Recommendation

Add perpetrator and dependent linkage to client records (for case management ease) and allow perpetrator information to be seamlessly referred to LEADS without the inclusion of any survivor PII.

See Section 2C.3.3: “Support Statewide Case Documentation, Referrals, and Survivor Service Coordination”



3.4 System Safeguard: How HTI Platform Protects VSP Roles

HTI Platform supports VSPs by enforcing legal boundaries through system design. It eliminates the need for staff to constantly monitor compliance manually and instead **builds privacy into every feature**:

- **PAVE** restricts access to survivor case files unless a valid ROI exists; agency data is siloed by default.
- **Trail** ties user access to completed training and role certification.
- **Thread** enables hotline teams to triage and refer without seeing survivor data.
- **Echo** logs all access, edits, and exports—creating a clear audit trail that protects both the VSP and the survivor.

This model empowers VSPs to document accurately, share appropriately, and defend their practices under audit—all without compromising trust.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

VSP CASE LIFECYCLE: CONFIDENTIALITY AT EVERY STEP

The following is one common pathway observed across certified Oklahoma VSPs during field visits. It highlights how survivor privacy is protected across each phase of care:

↳ Hotlines & Referrals: First Point of Contact

Most VSPs operate or share responsibility for a 24/7 hotline. These hotlines may be staffed by **volunteers** or **shelter workers** with limited access to case files. Their role is to respond compassionately, collect only the minimum information necessary, and connect the caller to an appropriate internal team. One Oklahoma-certified VSP piloted a successful model where hotline handling was **outsourced** to reduce staff strain while preserving response quality.

↳ Screening & Case Management: Building the Relationship

Once a connection is made, an internal **navigator** initiates a light-touch screening to identify red flags and assess potential risks.

“Are you experiencing anything that makes you feel uncomfortable?”

If yes: ***“Do you want to talk to someone about this?”***

If concern arises and the caller agrees, they are **referred to a certified victim advocate**, who provides deeper assessment and care planning. At this point, detailed services and supports begin—and are logged in PAVE under strict internal controls.

↳ Grant Reporting & Auditing: Closing the Loop

Once services are underway, a separate **administrative team** prepares structured, **de-identified** data exports for state and federal funders. These reports are generated from case records in the PAVE system and follow strict logic that prevents any identifying information from being shared, while still meeting the record-keeping standards defined in **OAC Title 75:30-5** and relevant grant requirements.



Proposed Recommendations

Hotline staff should use Thread for call handling and referral to an internal navigator, who receives the referral in PAVE and asks light questions that map to the risk indicators. Upon referral to a victim advocate, these indicators are all part of the record.

The advocate should conduct an in-depth, trauma-informed assessment to assess risk and identify needs as trust is built (PAVE's IDA), and use the referral capabilities to track and connect needs.

The administrative team's needs should be addressed and accessed via Echo.

See Section 2C.4.4: “Screening, Identification, & Response System.”



3.5 Key Needs & Opportunities

VSPs across Oklahoma identified several priorities for platform development and system-wide support:

- **Consent-Based Automation:** ROIs must be updated regularly—especially when new services are added. VSPs requested automated ROI templates that pull from case data and align with known disclosure scenarios (e.g. legal referral, mental health intake).
- **Workflow Fit:** Platform features must mirror how real frontline teams work. For example, one VSP received 3,200+ hotline calls in 2024. Their system must allow intake staff to search by caller ID, track referral history, and document handoffs between roles.
- **Integrated, Realistic Training:** Most certified VSPs serve survivors of multiple forms of violence. Training must reflect polyvictimization realities—domestic violence, sexual assault, trafficking—and offer scenarios that reflect how identification unfolds in practice.



MILESTONES TO CAPTURE | SPECIFIC TO VICTIM SERVICE PROVIDERS

- First contact, which often includes hotlines. (*Note that hotline calls will be made from law enforcement, other professionals in community*). Capture screening outcomes.
- *Vulnerabilities that were exploited* (e.g., housing instability, prior system involvement) and *how they were addressed over time*.
- Referrals to services and engagement with services (including survivor declines to traditional case management) - capture the scale and type of service engagement, not just the binary “connected / not connected.”

4. LAW ENFORCEMENT

Proactive Precision. Shared Intelligence. Guarded Access.

Law enforcement agencies play a critical role in Oklahoma’s anti-trafficking response—developing leads, building cases, and coordinating across jurisdictions to interrupt trafficking networks and secure survivor safety. Their access to survivor-linked information is **intentionally narrow**, governed by strict legal standards, and carefully traced at every step. The systems they use must reflect the high-stakes nature of their work while upholding both federal privacy protections and interagency boundaries.

4.1 Core Focus

Law enforcement investigators and analysts conduct proactive, intelligence-driven investigations and collaborate with other agencies to reduce system fragmentation. Their work spans the lifecycle of a case—from tip validation to prosecution support—and contributes directly to more consistent outcomes for victims and more strategic disruptions of trafficking activity.

4.2 Role in the Identification & Response System

- Validate tips, leads, and referrals from sources such as VSPs, child welfare services (CWS), or public tip lines.
- Build criminal cases using aggregated intelligence from all-source datasets.
- Upload validated investigations to RMS systems for trial readiness and judicial continuity.
- Coordinate operational responses and joint task force participation when cases cross jurisdictions.



► FIELD SNAPSHOT: LAW ENFORCEMENT IN PRACTICE

A LEAD BECOMES A CASE: FROM TIP TO PROSECUTION

The following is one example of how a tip may be reported to law enforcement in the system. However it is important to keep in mind that reports may come into the system in different forms.

- **Lead Submission & Routing:** A tip is submitted via a Thread alert—possibly from a VSP, CWS, or hotline operator. The alert is routed to the appropriate law enforcement agency. The system scans the lead for threat indicators, scoring criteria, and pattern matches with existing cases.
 - **VSP to Law Enforcement Ideal Lead Submission:** Law enforcement representatives noted that when the tips are coming from a VSP, some of the most helpful information is verifying:
 - Geographic information (locations, addresses)
 - Online footprint (social media accounts, digital presence)
 - Suspect details (names, phone numbers, vehicle data, known associates)
 - Contextual background (family, contacts, relationship dynamics)
 - **Value of this Information:** Accelerating the verification process of this information helps reduce manpower, time, and financial costs for investigations. In the process, VSPs can sometimes provide intelligence on other traffickers or broader networks that law enforcement may not have identified.

- **Triage & Pattern Detection:** An intelligence analyst reviews the tip, checking for connections to known suspects, vehicles, phone numbers, or geographic hotspots. A strong match prompts case elevation; a weak match may result in passive monitoring or a request for clarification from partners.

◦ *Note:* LEADS is designed as an investigative database rather than a records management system. Due to the varying number of law enforcement officers and their affiliated RMS / CMS systems, more technical effort will be required to effectively integrate LEADS with each law enforcement officer.



Proposed Recommendation

LEADS should serve as the state's primary investigative tool for human trafficking, enabling lead management, network mapping, deconfliction, and intelligence sharing. It complements—rather than replaces—existing RMS and should be embedded into routine investigative practice to support proactive, compliant case development. See Section 2C.3.4: “Designated Investigative Platform.”

- **Case Assignment & Coordination:** The lead is assigned to a **case agent** in the relevant jurisdiction. Within LEADS, the agent can collaborate with other jurisdictions (e.g., state bureau, tribal authorities), attach documentation, and log activity in a secure, shared workspace.
 - **Human Trafficking Consultant Coordination:** Law enforcement representatives noted that smaller agencies or jurisdictions without a human trafficking-specific staff member should be able to request a human trafficking-trained consultant to assist with their case as needed. *(This would ensure local agencies retain control while still benefiting from specialized support without concerns about overreach.)*
- **Operational Collaboration & Deconfliction:** If the case overlaps with other investigations, a **deconfliction alert** is triggered. A designated liaison coordinates joint operations, ensuring information is not siloed and resources are not wasted. All shared access is governed by MOU and security clearance.
 - Deconfliction, alerts, and visibility across jurisdictions need to be streamlined.
 - The ability to quickly identify in real-time (in the field or in the office) overlapping investigations and to what degree other law enforcement has or is working on a particular target. This reduces duplicative work and wasted resources.
 - Human trafficking case can remain open for decades depending on the size of the network and re-perpetration habits. With so much information and limited human trafficking focused investigators in the state, it is important that the system clarifies actionability and alerts investigators when appropriate.



Proposed Recommendation

Require agencies to use the LEADS workflow to prevent overlap and improve victim identification. See Section 2C.3.4: “Deconfliction.”

- **Documentation & Case Progression:** Agents track milestones such as interviews, warrants, and arrests. LEADS generates a timeline and an audit trail, ensuring both **traceability** and **legal defensibility**.
- **Prosecution Handoff:** When the case matures, it is routed to a dedicated human trafficking prosecutor—such as an Assistant Attorney General working with the Human Trafficking Response Unit. LEADS facilitates review, charges, and trial preparation using data structured for legal contexts.



Proposed Recommendation

Recommend appointing a dedicated human trafficking prosecutor within the OAG to support case development and ensure legal continuity from investigation through prosecution. See Section 2C.3.4: “Prosecutorial Integration.”

- **Audit & Oversight:** All activity is logged and reviewed by state-level administrators. Federal compliance with 28 CFR Part 23 and CJIS is enforced through scheduled and random audits, sandbox reviews, and strict access control.



4.3 Compliance Landscape

Law enforcement access to trafficking data is governed by 28 CFR Part 23 and the Criminal Justice Information Services (CJIS) Security Policy, which set federal standards for information handling, intelligence sharing, and data safeguarding. Although law enforcement is not directly bound by VAWA, they cannot receive survivor identifiable information from VAWA-funded entities (such as VSPs) unless a valid, signed Release of Information (ROI) is in place or a narrow statutory exception applies.

System safeguards ensure that:

- All access is tied to user role, clearance level, and documented purpose
- Audit logs track every export, view, or edit
- ROI enforcement is built into the system's backend

4.4 Key Needs & Opportunities

Based on law enforcement tool demonstrations and workgroup feedback:

- **Standard Operating Procedures (SOPs) and context-specific training** are needed across agencies.
 - With uneven trafficking expertise, it is vital to match access to clearance and role-specific training.
 - Geographic limitations and agency protocols require tools like lead **geofencing** and **tiered access by function**.
- **Real-time alerts and deconfliction tools** are mission-critical.
 - Field agents and office analysts must be alerted when targets or data points overlap.
 - Without visibility, multiple agencies risk working the same lead independently, wasting time, putting operations at risk, or potentially endangering lives.
 - Trafficking cases often span years or decades—systems must flag actionability and sustain long-term memory.
- **Clear role definition between LEADS and RMS systems.**
 - Law enforcement seeks a “one-stop-shop” workspace. Tools like LEADS must clarify what they do, how they complement RMS systems, and when to use each.
- **Legal backing for interagency collaboration.**
 - Effective information-sharing depends on clearly signed MOUs, defined scopes, and security approval from command leadership.
 - Officers must feel legally protected in using integrated tools.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

Relevant Statute

Code of Federal Regulations Title 28: § 23.20(a, h):

“(a) A project shall collect and maintain criminal intelligence...only if there is reasonable suspicion... and... relevant to that criminal conduct or activity...(h) All projects shall adopt procedures... **periodic review**...destruction of any information which is misleading, obsolete or otherwise unreliable... with name of reviewer, date of review...” Information retained in the system must be reviewed and validated for continuing compliance with system submission criteria before the expiration of its retention period, which in no event shall be longer than **five (5) years**.”



Code of Federal Regulations Title 28: § 23.20(f):

“... a project shall **disseminate criminal intelligence information** only to law enforcement authorities who shall **agree to follow procedures regarding information receipt, maintenance, security, and dissemination which are consistent with these principles**.”



► Key Need

SOPs that set collection and retention policies and create a criminal intelligence exchange amongst human trafficking investigators and analysts using LEADS in Oklahoma.



Proposed Recommendation

Track source, validate intelligence, purge outdated / misleading data, and log review metadata. Assign tactical team to conduct periodic review of data relevancy, importance, and accuracy for validation.
See Section 2C.3.4: “Operational SOPs.”

Relevant Statute

Code of Federal Regulations Title 28: § 23.20(g):

“A record indicating **who has been given information, the reason for release of the information, and the date of each dissemination outside the project shall be kept**. Information shall be labeled to indicate levels of sensitivity, **levels of confidence, and the identity of submitting agencies** and control officials. Each project must establish written definitions for the need to know and right to know standards for dissemination to other agencies as provided in paragraph (e) of this section.”



► Key Need

Controlled access to information based on information sensitivity and user role. Access to information should be logged.



Proposed Recommendation

Intelligence-sharing is governed by a formal Need-to-Know Model, enforced through tiered permissions, role-based visibility, and logged protocols.
See Section 2C.3.4: “Tiered Access & Information-Sharing.”



4.5 System Safeguard: The LEADS Platform

LEADS acts as a centralized intelligence database—not a replacement for RMS systems, but a **collaborative workspace** where agencies can connect data points, manage cross-jurisdictional leads, and track investigative momentum. It aggregates and scores data, visualizes networks, alerts agents to duplication risks, and supports strategic action across law enforcement entities.



MILESTONES TO CAPTURE | SPECIFIC TO LAW ENFORCEMENT

- Quantify *lead generation by source* (e.g., hotline, online data, financial SARs) and track how those leads evolve into *cases or actionable investigations*.
- Visibility into patterns of demand and trafficking dynamics, including operational *locations, methods of control, and network structures*.
- Operational metrics tied to investigative workflows:
 - Victim contact reports (e.g., intelligence reports after stop-and-talks)
 - Victim recovery steps (interviews and referral documentation)
 - Investigative actions (*key searches and hits, connections made*, locking down social media profiles, subpoena requests)



Proposed Recommendation

The Trafficking Risk Assessment (TRA) on LEADS captures many of the milestones and key details. Encourage the collection of this information prior to or without intention of providing full LEADS access by embedding and integrating this module as extensively as possible. This will systematically produce the analysis identified as important to the Tactical Workgroup, and create an immediate feedback loop to iterate on the TRA prior to broad scale launch and adoption.

See Section 2C: “Strategic Plan / Recommendations.”

5. CHILD WELFARE & YOUTH-PROTECTION PARTNERS

Early Screening. Coordinated Safety Planning.

5.1 Core Focus

Child Welfare Services (CWS), together with Oklahoma DHS, the Office of Juvenile Affairs (OJA), multidisciplinary teams (MDTs), and child advocacy centers (CACs), serve as the **frontline system for children who may be trafficked or at risk**. These agencies:

- Receive abuse-and-neglect reports from hotlines, schools, and community members;
- Screen every allegation for trafficking indicators;
- Launch joint investigations alongside law enforcement; and
- Connect children to services through MDT-coordinated plans.

5.2 Role in the Identification & Response System

PHASE	WHAT CWS & PARTNERS DO
Screen	Flag trafficking risk in hotline calls, field investigations, and foster / adoption placements.
Refer	Route suspected cases to CACs or VSPs for assessment and wraparound care.
Coordinate	Activate MDTs so prosecutors, investigators, medical staff, and advocates share a unified plan.
Support	Provide ongoing services and monitor safety as cases progress.



5.3 Compliance Landscape

Federal and state mandates require a proactive approach to screening and identification:

- **Preventing Sex Trafficking & Strengthening Families Act** and **Justice for Victims of Trafficking Act** require every state and tribal Title IV-E agency to implement policies and procedures to **screen, assess, identify, document, and provide services** to youth who are victims of sex trafficking *or at risk of becoming victims*. Trafficking must be recognized as a form of abuse *regardless of whether the exploiter is a caregiver*, and state agencies are to take an active role in **screening and early identification** (not just reactive response) and train child protective service workers.
- The **Oklahoma Children's Code** strengthens these obligations by requiring CWS to determine whether trafficking occurred *whenever a missing child returns*, and to activate MDT protocols as needed.

Together, these statutes establish a mandate for *system-wide (universal) screening and documented service pathways* for all youth receiving child welfare services. Oklahoma must identify *those at risk*, not just confirmed victimization from reports of trafficking.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS



Relevant Statute

Oklahoma Children's Code: 10A O.S. § 1-9-123(C)(4):
“...determine what the child or youth experienced **while absent from care**, that would include an appropriate **screening** to determine if the child or youth is a **possible victim of sex trafficking**.”

► Key Need

Mandated Screening for Missing Youth



Proposed Recommendation

Trigger a screening prompt in PAVE upon return from missing status. Leverage the “Missing Youth” section of the IDA for standardized documentation.

See Section 2C.3.3: “Trigger Screening Workflow: Missing Youth Screening.”



Relevant Statute

Oklahoma Children's Code: 10A O.S. § 1-9-123(D):
“The Department shall **report** to law enforcement authorities immediately, and in no case later than twenty-four **(24) hours**, after receiving information on a child or youth who has been identified as being a sex trafficking victim ...”

► Key Need

Immediate Reporting



Proposed Recommendation

Trigger a mandatory share alert to law enforcement and embed documentation when trafficking indicators are flagged by DHS to meet “within 24 hours” reporting window outlined in § 1-9-123(D).

See Section 2C.3.3: “Automated 24-Hour Reporting Workflow.”



5.4 System Safeguard: How HTI Platform Helps

- **PAVE** embeds child-specific screening questions at hotline, investigation, & placement stages.
- **Thread** routes hotline tips to the correct MDT or investigative team without exposing sensitive child data.
- **Trail** provides training on identifying and responding to trafficking as well as system protocols, effective for the federal requirements to train child protective service workers. Trail also records trafficking-specific training completion before users may access sensitive modules; ensures only authorized staff can see identifiable information, and MDT partners see just what they need.

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

Relevant Statute



CAPTA, as amended by JVTA: (42 U.S.C. § 5106a(b)(2)(B) (xxiv))

“Requires procedures for “identifying and assessing reports involving children who are sex trafficking victims, including training for child protective services workers.”



Proposed Recommendation

Align training modules with compliance expectations. Create SOPs for role and cross-sector certification, requiring training and certification.

See Section 2C.4.2: “Training & Onboarding Requirements.”

★ OKLAHOMA DISCOVERY PHASE ANALYSIS

CHILD WELFARE SERVICES JOURNEY—FROM HOTLINE TO MDT

WORKFLOW STEP	REAL-WORLD ACTION
Child Abuse Hotline	CWS specialists capture trafficking red flags and open an investigation if warranted.
Field Investigation	CWS workers conduct home visits and interviews; law enforcement collaboration begins when trafficking is suspected.
MDT Activation	27 regional MDTs, convened by local district attorneys and staffed by CACs, plan forensic interviews and service coordination.
CAC Engagement	CAC clinicians provide child-friendly forensic interviews and wrap-around services for the minor and family.
Tribal Coordination	When a tribal youth is involved, tribal child-welfare units (e.g., Cherokee Nation) co-investigate alongside DHS.

5.5 Key Needs & Opportunities

- **Foster / Adoption Screening:** Tools vary statewide; standardized risk screens are needed before placement to prevent breakdowns.
- **Formal Identification Reluctance:** Many hesitate to tag cases as trafficking due to placement and service limitations. PAVE supports “flag without label” logic.
- **Missing-Youth Protocols:** Statute requires post-return trafficking screening, but unified tools, resources, and inter-agency coordination are still lacking. Platform should prompt screenings automatically post-return.
- **Screening at First Contact:** Not every call is screened for trafficking today; embedding a quick, traceable screen into hotline workflows would close critical gaps.
- **CAC Integration:** CAC-led forensic interviews should be formally incorporated into DHS case planning when trafficking is suspected.



6. MANDATORY REPORTERS & OTHER “TOP OF THE FUNNEL” PROFESSIONALS

Early detection triggers connection to services and coordinated response.

Mandatory reporters are often the first point of contact for youth experiencing trafficking or high-risk conditions. Their proximity to students, patients, and community members puts them in a unique position to observe red flags early, often before law enforcement or child welfare services (CWS) are aware of the situation. However, without screening tools, clear feedback loops, or training, these professionals are under-equipped in Oklahoma’s current trafficking response system.

WHY MANDATORY REPORTERS MATTER:

Teachers, nurses, doctors, and front-desk staff are often the first to see warning signs, well before a child is formally identified by law enforcement or CWS. But without the right tools or training, they miss the chance to intervene.

The Platform offers a solution: embedding trauma-informed screening tools into the systems already used by mandatory reporters (such as electronic health records or school-based referral platforms), while automating referrals, documentation, and feedback through PAVE.

6.1 Role in the Identification & Response System

These sectors serve as early detection points, observing warning signs and feeding potential cases into the coordinated response system.

Schools

Train educational staff to screen at-risk youth and make both service referrals and mandated reports based on behavior, disclosures, or observable risk factors. Youth are more likely to disclose trafficking or related abuse to trusted adults at school before any law enforcement or CWS involvement. Integrate referral and reporting functions into existing platforms, and clarify when to contact DHS directly.

Healthcare

Mandate trauma-informed trafficking screening in domestic violence, sexual assault, and human trafficking healthcare settings, particularly SANE (Sexual Assault Nurse Examiner) programs. Ensure clear policies on when suspected or confirmed trafficking must be reported to DHS or law enforcement. Equip clinics and hospitals with screening tools and reporting templates that link directly into the HTI platform.

Financial Institutions

Enable financial institutions and fraud investigators to support trafficking investigations by filing Suspicious Activity Reports (SARs) and cross-referencing suspected offenders within LEADS. Provide workflows for sharing SAR-related case data securely with law enforcement and victim service agencies, with feedback loops to show case progression and outcomes.



Hospitality

Train hotel and lodging staff to recognize trafficking indicators and understand the legal prohibitions outlined in Oklahoma Statutes § 21-1087, which prohibits knowingly permitting premises to be used for child sex trafficking. Emphasize the role of front desk, cleaning, and security staff in identifying patterns (e.g., repeated short-stay room use by minors) and escalate concerns via reporting and referral pathways.

6.2 Compliance Landscape

Mandatory reporters in Oklahoma are governed by the **Oklahoma Children's Code**, which requires immediate reporting of suspected child abuse, neglect, or human trafficking to the Department of Human Services (DHS). In certain circumstances, law enforcement must also be notified.

- Reports must be made as soon as the reporter has reasonable cause to believe a child is a victim of abuse, neglect, or trafficking.
- This applies to educators, healthcare providers, hospitality workers, and other professionals designated as mandatory reporters under state law.
- Failure to report can result in criminal liability or professional consequences.
- Reports typically flow into the DHS hotline system and are also captured through platforms like Thread or PAVE, where they are time-stamped, documented, and routed for investigation or services.

This mandate ensures that early-warning professionals, those who often see red flags first, are both empowered and legally required to trigger protective action.

The system's strength depends on each sector performing its role within clearly defined boundaries.



STRATEGIC TAKEAWAY

Each sector plays a critical role, but coordinated workflows, consistent screening, and cross-sector trust are the foundation for effective system responses to human trafficking.

Oklahoma's approach makes this explicit: response is not about one agency doing it all, it is about each doing their part at the right time, with the right boundaries.



C. Strategic Plan / Recommendations

Oklahoma is advancing one of the most ambitious statewide anti-trafficking initiatives in the nation. This section begins by reviewing what stakeholders told us they needed. It then addresses the overarching policy goal of the Oklahoma Human Trafficking Data System. Finally, it concludes by outlining policy recommendations to put in place a system that meets that goal, responds to stakeholder priorities, and results in a strong legal, operational, and governance foundation for the system. The recommendations align with Oklahoma HB 4210 and reflect frontline input, legal standards, and implementation realities gathered during the 2025 discovery and pilot phases.

1. SUMMARY OF STAKEHOLDER PRIORITIES & CROSS-CUTTING REQUIREMENTS

What the community told us is essential.

Insights from Phase 1, particularly the agency mappings in Section 2B and the architectural priorities in 2A, revealed consistent cross-sector themes that must anchor implementation. Stakeholders across law enforcement (LE), victim service providers (VSPs), child welfare services (CWS), and multi-disciplinary teams (MDTs) emphasized a shared message: *tools must align with real-world workflows, reduce duplication, and streamline daily operations*. To drive daily use, all tools and information must act as force multipliers, simplifying administrative tasks, reducing redundancies, and improving coordination across agencies.

1.1 Victim Service Providers Priorities

- There is a need for a **full-featured case management** system (CMS) with embedded screening, assessment, documentation, reporting, and training.
- Tools must automate grant compliance (VAWA, VOCA, FVPSA, OAC Title 75:30) and support collaborative referrals.
- Streamlined certification workflows and platform training should reduce staff burden.
- There is a need to develop a *system feedback loop* that can notify reporters—such as educators, medical staff, or behavioral health providers—when a referral is claimed by OK DHS. The feedback needs to trigger milestone updates (e.g., assessment initiated, case closed). This helps rebuild trust in the system by providing transparency for frontline professionals.
- System workflows must be intuitive, low-burden, and reflect how work is actually done on the ground.
- In order for VSPs to communicate survivor needs to a new team member or agency - tools must support secure information-sharing communication. This is crucial for VSPs and partner agencies to coordinate services, share appropriate case information, and receive timely updates.

1.2 Law Enforcement Priorities

- Tools must support **intelligence sharing, tip validation, and case-building**, without duplicating records management systems (RMS). The system should facilitate building cases and properly **share / upload information to agency RMS systems** for policy compliance and discovery.



- Clear SOPs are needed to guide day-to-day functions like lead scoring, intel upload, and cross-agency coordination.
- Training and onboarding should clarify how additional tools fit into the investigative ecosystem.
- LEADS should be a future replacement for systems redundancy (i.e., TLO, Spotlight, etc.,)
- Tools must allow for secure, time-sensitive communication between users when appropriate in order to support intelligence sharing, case coordination, and urgent response. Communication features must meet legal and policy standards for privacy, audit-ability, and role-based access safeguards.

*“This system is coming. It’s a legislative requirement. Our opportunity is to build it in a way that becomes a force multiplier for investigations. The system can be a **one-stop-shop** for human trafficking investigations collaborations between all state law enforcement units and our service provider partners.”*

- Oklahoma Law Enforcement Stakeholder | Investigations Workgroup Lead: Nick Wheeler | OCAT, TPD

1.3 Shared Priorities Across Sectors

Stakeholders from all sectors emphasized five core needs:

1. **Role-based onboarding and training that reflect agency workflows**
2. **Structured referral workflows** with traceable feedback loops
3. **Platform logic aligned to daily operations and staff responsibilities**
4. **Metrics infrastructure** for grant reporting, audit preparation, and performance tracking
5. **Cross-agency and cross-sector coordination and communication tools** that maintain sector-specific roles and responsibilities

These themes should anchor implementation efforts across the state.

- **Workflow alignment and simplicity:** Tools must match the actual workflows of law enforcement, VSPs, and others. If not, they risk creating burdens, duplication, or abandonment.
- **Minimizing duplicative entry and siloed systems:** Sector champions want HTI Platform tools to serve as their primary system where possible. This includes top-of-funnel tools like reporting and screening, investigative tools like LEADS, and service coordination tools like PAVE.
- **Shared but bounded collaboration:** Partners support information-sharing across sectors, but only with proper boundaries, role-based safeguards, and accountability.
- **Training and trust:** Without proper onboarding and training, data systems can erode trust or generate misuse. Training and user support must be built-in, not bolted on.
- **Outcome metrics:** Across all sectors, stakeholders expressed a desire for meaningful outcomes metrics. These should support internal improvement, program sustainability, and cross-sector accountability.

These themes emerged through cross-sector interviews and design workshops and are discussed throughout Sections 2A and 2B.



STRATEGIC TAKEAWAY

System rollout must meet sectors where they are. Successful implementation hinges on tailored onboarding strategies, aligned rule-setting, and role-specific policy guidance.

2. FROM PLATFORM TO NETWORK: BUILDING A SHARED GOVERNANCE ECOSYSTEM

Strategic Expansion of the System

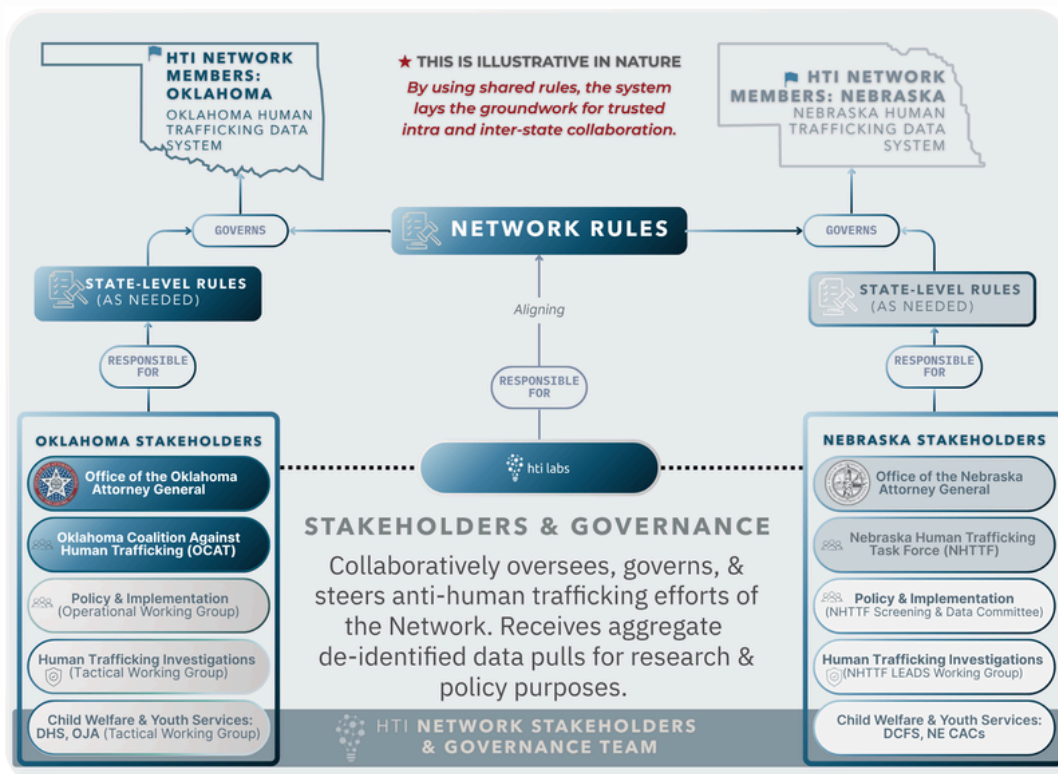
Phase I of this project clarified that in order to succeed, the project must move beyond software alone. The state is not simply purchasing digital tools, but joining a shared architecture for governance, rules, and alignment across systems and sectors.

HTI Platform users are not merely "end-users" of individual apps like PAVE or LEADS. They are **members of the HTI Network**: a larger structure of roles, certifications, permissions, and policy enforcement. Similarly, organizations that integrate data into the system or receive exports (e.g., top-of-funnel hotlines or downstream research) must agree to governance rules.

This has powerful implications:

- **Cross-state and cross-agency information-sharing becomes feasible and compliant by design.** For example, deconfliction between Nebraska & Oklahoma law enforcement could operate within HTI Labs' governance and technical stack without requiring a new MOU.
- **Shared rules can be audited and enforced** across sectors, ensuring legal compliance (e.g., VAWA, HIPAA, CJIS) without requiring agencies to reinvent safeguards alone.
- **Statewide governance bodies can evolve** to shape policy (*state stakeholders set rules*), while HTI Labs ensures underlying enforcement through tooling and infrastructure.

This model aligns incentives: agencies retain control, while benefiting from participation in a larger, legally compliant statewide task force and data ecosystem. Oklahoma's leadership in this domain could shape national standards. Agencies noted during the discovery phase that this shared governance approach would simplify onboarding and allow **secure interagency deconfliction with minimal new policy lift**.





2.1 Who is in the Network?

Frontline Anti-Trafficking Professionals

These are users engaged in day-to-day identification, response, or survivor support—such as law enforcement, VSPs, child welfare, and juvenile justice.

- **Key focus:** *What can they see? Share? Deconflict? Where should we screen or assess? Who makes decisions – and how do tools support that?*
- **Roles:** *Screener, Hotline Worker, Victim Assessment, Forensic Interviewer, Investigator, Analyst, Trained Advocate, Mandatory Reporter, MDTs, SANE Nurses, etc.*

Stakeholders (Workgroups, Coordinators, Task Force Leadership)

Oversee platform accounts, governance, and standards. They coordinate onboarding, evaluate performance using de-identified data, and guide strategic implementation.

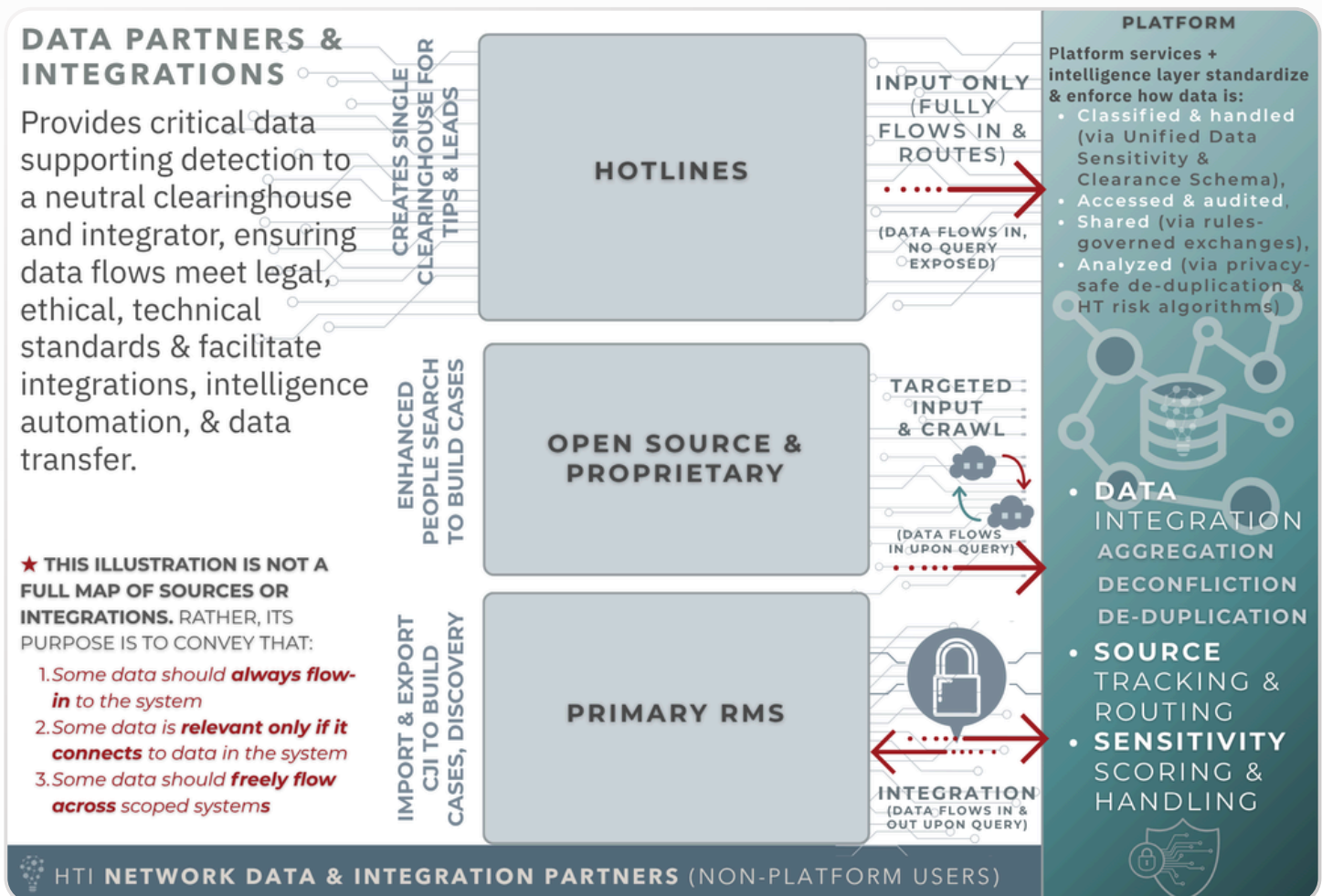
Data Partners & Integrations

Contribute data to part or all of the system, helping automate detection, deconfliction, and reporting. Includes hotlines, tips, RMS, proprietary data, and open-source tools.

- **Key focus:** *What can connect? What data is relevant? When should connections be scoped (agency-wide, role-wide, network-wide)? How should the sensitivity levels map to roles (of recipients or suppliers)?*
- **Roles:** *Hotlines, Tips, Reports; CJIS Records, Enhanced People Search, RMS, and auxiliary tools.*

Note: LEADS integrations run deep.

HTI Labs supplies data network-wide—like its commercial sex persona database and open-source sources—via LEADS. These integrations aren't surface-level: they're hardwired into the Platform, with algorithms continuously discovering, linking, and querying in real time. It's not just synced—it's actively thinking.





The system is also designed to be highly adaptable, capable of integrating new agencies (e.g., CWS, MDTs, tribal partners, financial institutions, the hospitality industry), permitting the input of data from other sources, and integrating new tools and capabilities as required. For example:

- The Network Rules include source and collection requirements to ensure the data maps to critical fields within the system correctly (so the platform does not become a “black box”). These same rules ensure that data partners can input data supporting detection without raising access risks; external integrations are tightly scoped and consent-aware.
- The Platform’s intelligence layer will standardize and enforce the platform’s unified data sensitivity and clearance schema, creating a common language for cross-jurisdictional sharing based on legal sensitivity, user roles, and acceptable usage.

2.2 Strategic Expansion of Platform Use Across CWS, MDTs, and Tribal Partners

As Oklahoma expands the statewide human trafficking data system beyond law enforcement and victim services, three critical sectors emerge: Child Welfare Services (CWS), Multidisciplinary Teams (MDTs), and Tribal Partners. Each plays a foundational role in identifying and responding to trafficking—especially when victims are minors—and each requires a thoughtfully sequenced implementation approach grounded in statute, trust, and operational feasibility.

Multiple pathways exist for bringing these partners into the system. Some can be leveraged immediately (e.g., MDT convenings), while others require infrastructure, training, or legal agreements (e.g., direct CWS access or tribal coordination). The recommendations below reflect stakeholder input and prioritize high-impact entry points that align with statutory mandates, system design, and practical realities.

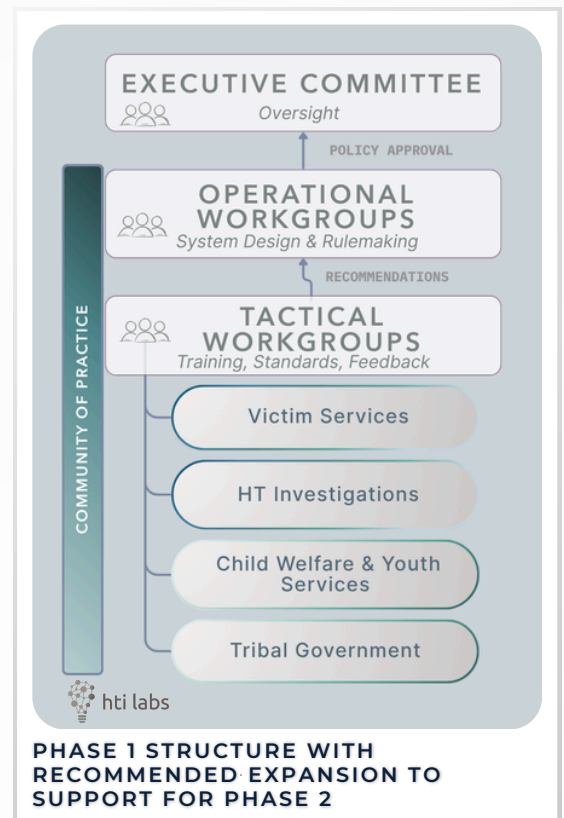
Leverage MDT Structures for Early Access

- MDTs offer a legally grounded, role-diverse entry point for expanding screening and data-sharing across child welfare, law enforcement, medical, and advocacy partners.
- This structure allows Oklahoma to initiate coordinated implementation without requiring individual agency contracts or legal renegotiations. *Information-sharing pathways are provided for statutorily.*
- MDT participation can serve as a “first wave” deployment strategy, allowing shared use of PAVE in a secure, role-based environment.



STRATEGIC TAKEAWAY

MDTs provide a promising point of entry but must be formalized as structured implementation pathways. Combining MDT access for early contact points with full PAVE deployment for broader system touchpoints creates a bridge between trust and scale.





Implement Point-of-Contact Screening Statewide

- PAVE should be used not only at intake, but across all relevant child welfare touchpoints, including:
 - Hotline triage
 - Field investigations
 - Placement screenings
 - Post-return protocols for missing youth
- System configuration should allow PAVE to log risk indicators, service needs, and interagency coordination actions in a unified, auditable record. This reduces duplication, enhances continuity of care, and supports future coordination efforts.

Referenced in Sections 2B.3 and 2C.3.3, Missing youth screenings and 24-hour reporting are statutory obligations under 10A O.S. § 1-9-123.

Integrate CAC-Led Forensic Interviews into CWS Workflows

- CACs currently conduct trauma-informed forensic interviews as part of MDT investigations.
- To strengthen identification and meet federal mandates, CWS should formally adopt CAC findings into its investigative and referral process.
- CACs should adopt an IDA-aligned version of the interview tool to document trafficking indicators and support victim referrals.

This will allow seamless, statutorily compliant coordination between MDTs, VSPs, and long-term care providers, and support trafficking experiences being substantiated into a collaborative system. This equips MDT members to connect minor survivors with appropriate victim service providers (VSPs) for ongoing support and care.

Formalize CWS and Tribal Platform Participation

Integration of CACs and tribal partners into the collective efforts is essential to statewide coordination.

- Child welfare agencies and tribal child protection teams must eventually become **direct platform users** to support broader screening and care coordination.
- Recommended next steps:
 - Create a dedicated workgroup for tribal onboarding and integration strategy.
 - Provide role-specific training via Trail.
 - Use PAVE access controls to reflect tribal sovereignty and data sensitivity agreements.
 - Ensure that all tribal and CWS users participate in network governance rule adoption and audit protocols.

A Tactical Workgroup will be needed specifically for tribal needs. For minors: **Further workgroup collaboration is needed**, particularly around the role of CACs who often conduct forensic interviews for both CWS and law enforcement.



3. RECOMMENDATIONS BY APPLICATION

Implementation Guidance for Each Core Application

This subsection outlines targeted implementation guidance for each of the five applications in the HTI Platform. These recommendations are specific to the functionality, onboarding, and use of each application.

TRAIL

3.1 Trail Recommendations: Training & Access Governance

- **Enforce Pre-Access Training Requirements:** Require all data access users to complete role-specific training via Trail prior to receiving credentials for LEADS, PAVE, or Thread. (See 2B.1: “Legal Standard” and 2B.2: “Where Each Sector Fits”)
- **Make Trail the Access Gatekeeper:** Trail should be the official enforcement layer for system access. Use the app to manage agency certifications, support audits, and onboard new communities. (See 2B.3: “Victim Service Providers” and 2B.4: “Law Enforcement”)
- **Validate and Strengthen Training Through Onboarding:** Use agency onboarding to test and validate training modules. (See “2A.1.1: Cross-Sector Roles”)
 - Modular, role-based training tracks prepare users for legally sound, trauma-informed platform use. Curriculum should be developed for all relevant user roles, cross-sector collaboration and community initiatives. (See 2A.4.4: “What Governance Makes Possible: Metrics, Insight, & System Impact”)
- **Standardize Certification and Accountability Processes:** Support SOP creation for certification, access denial, and appeals. (see 2A.4: “The Institutional Backbone”)
 - The system tracks certification status and audit readiness for each user, reinforcing compliance and accountability. (See 2A.4.4: “What Governance Makes Possible: Metrics, Insight, & System Impact”)
- **Create Statewide Certification Hub:** Allow Trail to evolve into a shared certification and training center for Oklahoma’s full anti-trafficking response. (See 2A.1: “From Intake to Insight”)

THREAD

3.2 Thread Recommendations: Reporting, Sharing, & Tip Routing

- **Establish a Centralized Public Intake:** Launch Thread as a shared public intake system, available to all vetted VSPs and coordinated by the OAG. (See 2A.1: “From Intake to Insight” and 2A.4: “The Institutional Backbone”)
- **Protect Sensitive Information Through Role-Based Access:** Implement role-based access and routing logic to minimize risk for minimally trained users (e.g., call center volunteers). (See 2A.2: “Coordinated Screening & Identification”)
- **Enable Seamless Escalation Based on Risk Signals:** Allow escalation to LEADS or PAVE based on signal strength, and ensure the hotline records flow into PAVE where relevant. (See 2A.2: “Coordinated Screening & Identification”)

PAVE

3.3 PAVE Recommendations: Screening, Case Management, & Service Coordination

- **It is the recommendation of stakeholders that state certified professionals working with human trafficking survivors implement PAVE as the core case management system (CMS) for human trafficking-certified VSPs.** This ensures aligned standards, streamlined compliance, and consistent survivor support. PAVE should be deployed with certified VSPs first. (See 2A.4: “The Institutional Backbone” and 2B.3: “Victim Service Providers”)
- **Comply with Certification Standards:** Embedded logic and documentation fields are mapped directly to OAC Title 75:30 standards, ensuring that VSP activity in the platform is audit-ready and aligned with formal victim certification requirements. (See 2A.1: “From Intake to Insight,” 2A.3: “Breaking Down Silos,” 2B.1: “Legal Standards,” and 2B.3: “Victim Service Providers”)



- **Support statewide case documentation, referrals, and survivor service coordination.** Track services, manage referrals, and document case activity in a centralized, secure environment—reducing fragmentation and improving continuity of care.
 - Provide structured outcome documentation for downstream uses such as T-visa declarations and formal victim designation, ensuring they are legally defensible and shareable under valid ROIs. (See 2B.3.3: “Compliance Landscape” for VSPs)
- The system should support the ability to add perpetrator and dependent linkage to client records (for case management ease) and allow perpetrator information to be seamlessly referred to LEADS **without the inclusion of any survivor PII** (See 2B.1: “Legal Standards” and 2B.3.3: “Compliance Landscape” for VSPs).
- **Enhance Identification:** Screening should be conducted even when trafficking is not immediately apparent. Complete In-Depth Assessments should be undertaken when trafficking is suspected or known. This supports early detection, improves intervention timing, and informs service planning. Screening capabilities are embedded in platform permissions, ensuring only authorized users conduct specific actions. (See 2A2.3: “The Graduated Screening Model”)
- Allow PAVE to serve as a **community coordination tool** in jurisdictions with multi-agency engagement. Align PAVE screening workflows with existing agency processes. Begin by integrating high-priority fields and flagging duplication risks. (See 2A3: “Breaking Down Silos”)
- **Trigger Screening Workflow: Missing Youth Screening via IDA in PAVE:** When a child returns from a missing episode, the system should automatically generate a screening prompt aligned with § 1-9-123(C)(4). Configure the “Missing Youth” section of the IDA to:
 - Automatically appear in cases flagged as “returned from missing”
 - Include drop-downs and risk indicators tied to trafficking screening
 - Timestamp the screening event and log downstream actions.(See 2B.5.3: “Compliance Landscape” for Mandatory Reporters)
- **Automated 24-Hour Reporting Workflow:** Trigger a mandatory share alert to designated MDT law enforcement contact and embed documentation when trafficking is substantiated or red flags reach threshold by DHS; helps meet the “within 24 hours” reporting window outlined in § 1-9-123(D). (See 2B.5.3: “Compliance Landscape” for Mandatory Reporters)

LEADS

3.4 LEADS Recommendations: Criminal Intelligence & Investigation Support

- **Designated Investigative Platform:** LEADS should be the state’s designated investigative tool for human trafficking cases, supporting lead management, cross-jurisdictional coordination, network mapping, deconfliction, and intelligence sharing.
 - It should be embedded into routine investigative practice to enable proactive, compliant case development.
 - It complements existing RMS by enabling intelligence sharing, tip validation, and cross-jurisdictional coordination. *It should not act as a replacement for criminal justice record keeping.* (See 2A4.4: “What Governance Makes Possible,” and 2B.4.2’s “Field Snapshot”)
- **Investigator & Analyst Functions:**
 - Investigator workflows should use LEADS to triage leads, track case progression, and coordinate action with other agencies.
 - Analyst workflows should use LEADS to organize incoming intelligence, detect cross-jurisdictional patterns, and support proactive case development.
 - Investigators and analysts should use LEADS’ entity structure to backfill networks over time, allowing long-term pattern recognition and organized crime mapping. (See 2A.3: “Breaking Down Silos” and 2B.4.2’s “Field Snapshot”)



- **Deconfliction:** Require data-sharing agencies to adopt the LEADS deconfliction workflow to reduce investigation overlap and increase victim identification. (See 2B.4.2's "Field Snapshot" and 2B.4.4: "Key Needs & Opportunities" for Law Enforcement)
- **Custodial Oversight:** The Human Trafficking Response Unit (HTRU) should be designated as the Oklahoma LEADS account custodian, responsible for user account provisioning, access control, data governance, and inter-agency alignment.
 - Each **participating law enforcement agency should designate a system liaison** to coordinate onboarding, training, and internal usage with HTRU and HTI Labs. (See 2A.1.1: "Cross-Sector Roles," 2A.4.4: "What Governance Makes Possible," and 2B.4.2's "Field Snapshot")
- **Operational SOPs:** All LEADS users should operate under shared SOPs that embed 28 CFR Part 23-compliant practices for data collection, retention, review, and deconfliction.
 - Data-sharing agencies should be required to adopt the LEADS deconfliction workflow to reduce overlap and improve victim identification. (See 2B.4.4 "Key Needs & Opportunities" for Law Enforcement)
- **Tiered Access & Information-Sharing:** Intelligence-sharing is governed by a formal Need-to-Know Model, enforced through tiered permissions, role-based visibility, and logged protocols to ensure CJIS and 28 CFR compliance.
 - Engagement guidelines must clearly distinguish between investigative and non-investigative use. (See 2B.4.4: "Key Needs & Opportunities")
- **Prosecutorial Integration:** To ensure continuity from investigation through prosecution, it is recommended that OAG include a dedicated human trafficking prosecutor (e.g., an assistant attorney general) to support case development and provide legal oversight. (See 2B.4.2's "Field Snapshot")



3.5 Echo Recommendations: Metrics, Evaluation, and Feedback

- **Make Echo the system of record** for human trafficking data metrics in Oklahoma. (See 2A.4: "The Institutional Backbone")
- **Define operational success metrics**, including:
 - Victim contact documentation (stop-and-talk intelligence reports).
 - Victim recovery and service connection.
 - Subpoena requests, phone searches, and social media lockdowns.(See 2A.4.4: "What Governance Makes Possible")
- **Provide live dashboards** to Governance Board and agency admins. (See 2A.4.3: "Where Governance Lives")
- **Use Echo for Reporting and Continuous Improvement:** Leverage the application to support grant reporting, internal agency learning, and shared system-wide accountability. (See 2A.4: "The Institutional Backbone" and 2B.3.3: "Compliance Landscape" for VSPs)
- **Strengthen the Data Ecosystem Through Broad Participation:** Encourage all sectors to contribute. This validates and enriches the data ecosystem, enabling meaningful insight and progress measurement. (See 2A.4.4: "What Governance Makes Possible")



4. RECOMMENDATIONS BY SYSTEM FUNCTION

Rules, Safeguards, and Protocols that Govern Implementation Across Applications

This final section defines operational guardrails and cross-functional requirements necessary for a secure and coordinated rollout. These recommendations apply across user types and technical components.

→ For each recommendation, refer to the relevant application section in 2C.3 for full implementation detail. For legal and compliance grounding, see the policy analysis and “statute-to-system” maps in Section 2B.

4.1 Governance Recommendations

- **Codify governance authority and certification logic in policy or executive guidance:**
 - Integrate federal and state regulations and references (VAWA, CJIS, HIPAA, 42 CFR Part 2, OAC Title 75:30, 28 CFR Part 23) into policy documents where needed.
 - The governance structure outlined in Section 2A.4 (*“The Institutional Backbone”*) must ensure policy consistency, guide onboarding, and resolve inter-agency conflicts related to compliance or data-sharing.
 - Stakeholders represented via the workgroup structure should include, at a minimum, the **OAG, OCAT, OK DHS, OJA, law enforcement, VSPs, and Tribal partners**. (2A.1.2: *“Built for the Frontline, Evolved by Use”*)
 - Stakeholders should commit to maintain consistent workgroup coordination and engagement indefinitely alongside project phasing. (See 2A.4.1: *“Why Governance Matters: Building a Trusted System”*)
- **Adopt governance rules through cross-sector Executive Committees:** Platform members must adopt generalized HTI Network Rules, *including the state (Oklahoma) and sector level rules*, as the binding governance framework in order to standardize referral, deconfliction, and data quality logic across the system. (See 2B.5, 2C.2)
 - Begin with provisional rules co-developed with sectoral champions, then refine through real-world piloting. (See 2A.4.2: *“How Governance is Built: The Structure Behind the System”*)

Auditing & Metrics

- **Prioritize data flow and transparency:** Develop clear, compliant protocols for data exports, research integration, and anonymization to foster trust and insight. Establish secure data retention, export restriction, and audit documentation policies. (See 2A.4: *“The Institutional Backbone”* and 2C.3.5: *“Echo Recommendations”*)
- **Prioritize real-time audits over static data exports:** Mandate real-time auditability, *clearance-level tracking*, and data segmentation, with some degree of audit oversight being given to the **workgroups**. (See 2A.4.2 *“How Governance is Built: The Structure Behind the System”*)
- **Invest in metrics infrastructure:** Ensure agencies have access to Echo for performance metrics, grant compliance, and task force strategy. Institutionalize long-term infrastructure for the community dashboard for statewide metrics and compliance audits to ensure system accountability and statewide performance monitoring. (See 2A.4: *“The Institutional Backbone”* and 2C.3.5 *“Echo Recommendations”*)



4.2 Training & Onboarding Recommendations

- **Require training and certification via Trail for all Platform users:** This ensures understanding of compliance boundaries, access expectations, and safeguards across sectors. (See 2B.1–2B.2 and 2C.3)
 - Align training modules with compliance expectations, role permissions, and data governance. Establish "training → certification → access" processes to reinforce compliance before system entry. All system users receive scenario-based certification.
- **Implement centralized onboarding and support:** Use Trail and Platform infrastructure to support consistent onboarding, account provisioning, audit readiness, and data security. Require sector-specific onboarding and annual recertification tied to platform access. (See 2C.3)
- **Work toward integrating existing agency workflows before fully enforcing replacement** (see 2A.3 and 2B sector notes): Allow initial duplication, then gradually phase out legacy systems as user trust and alignment grow.
- **VSP account setup:** VSPs must be able to have direct PAVE accounts (and contracts) for compliance with VAWA. They should be empowered to configure their own privacy defaults and provided the option to handle their own authentication and encryption keys.
- Formalize platform **access tiers and rules** based on a user's role, agency type, & certification level. (2B.5.4: "System Safeguard: How HTI Platform Helps")
- **Scale access carefully**, starting with certified agencies and expanding in waves. Apply the established "Policy → Specification → Development → Training → Launch" process to new sectors (e.g., CWS, CACs).

4.3 Intelligence & Deconfliction

- LEADS should centralize tips and known associations to allow statewide deconfliction. (2B.4.5: "System Safeguard: The LEADS Platform")
- Thread and PAVE referrals to law enforcement should surface prior known associations to prevent duplicative investigations. (See 2C.1.3: "Shared Priorities Across Sectors")
- Deconfliction rules should prioritize investigative integrity and auditability. (See 2B.4.3: "Compliance Landscape" and 2B.4.4: "Key Needs & Opportunities")

4.4 Screening, Identification, & Response System

- Standardize use of **Graduated Screening Model** across sectors.
 - Establish role-based screening protocols in education, healthcare, shelters, CWS, law enforcement, and VSP sectors. (See 2A.2.3: "The Graduated Screening Model")
 - Ensure identification occurs at multiple points—early detection, triage, and in-depth assessments—through tools calibrated to role and context. (See 2A.3.2: "How the System Enhances Response through Collaboration Across Sectors")
 - Establish statewide protocols for In-Depth Assessments (IDA) conducted by certified providers (per OAC Title 75:30). (See 2A.2.3: "The Graduated Screening Model")
- Platform should be required for **adult state-certified** VSPs and should be considered for the relevant **youth counterparts** of the MDT systems. (See 2C.1.3: "Shared Priorities Across Sectors")
- Define consistent referral logic. Require traceable, role-bound referrals governed by valid ROI. (See 2A.4.4: "What Governance Makes Possible: Metrics, Insight, & System Impact")
- **CACs** should adopt an appropriate version of an **IDA** and **CWS** should formally integrate **CAC-led interviews and findings** into its investigative and referral processes. (See 2B.5.5: "Key Gaps and Opportunities")



- **Close the feedback loop for mandatory reporters:** PAVE can notify them when a referral is claimed by DHS and trigger milestone updates (e.g., assessment initiated, case closed). This helps rebuild trust in the system by providing transparency and closure for reporters. *(See 2C.1.1: “Victim Service Provider Priorities”)*
- **Address hesitancy in formal case categorization:** PAVE can accommodate this reality by allowing accurate documentation without forcing premature classification, thus balancing identification with operational feasibility. *(See 2A.3.1: “A Continuum of Response,” 2A.2.3: “The Graduated Screening Model,” and 2B.5.5: “Key Needs and Opportunities”)*
- Hotline staff should use Thread for **call handling and referral** to an internal navigator, who receives the referral in PAVE and asks light questions that map to the risk indicators. Upon referral to a victim advocate, these indicators are all part of the record. The advocate should **conduct in-depth, trauma-informed assessment to assess risk and identify needs** as trust is built (PAVE’s IDA), and use the referral capabilities to track and connect needs. The administrative team’s needs should be addressed and accessed via Echo. *(See 2B.3.4: “System Safeguard: How HTI Platform Protects VSP Roles”)*
- **Support identification by screening at every stage**—initial screening, triage, and comprehensive assessment. *(See 2A.3.2: “How the System Enhances Response through Collaboration Across Sectors”)*

Child Welfare

- **PAVE’s Missing Youth screening workflow** directly supports DHS compliance with § 1-9-123(C)(4). Child welfare onboarding must emphasize how this prompt is triggered and documented post-return. *(See 2C.3.3: “PAVE Recommendations”)*
- **Time-stamped Escalation:** If trafficking indicators are flagged, platform triggers should automatically generate appropriate alerts to law enforcement and embed documentation—helping the agency meet the “within 24 hours” reporting window outlined in § 1-9-123(D). *(See 2C.3.3: “PAVE Recommendations”)*

Oklahoma’s leadership and legislative foundation create the conditions for lasting impact. By aligning technical implementation with legal and policy safeguards, the state can protect victims, empower investigators, and lead the nation in coordinated anti-trafficking infrastructure.



CONCLUSION: FROM BLUEPRINT TO BUILD

Over the course of Phase 1, this project has defined a vision and translated that vision into concrete governance standards. The result is a fully scoped, legally sound, and operationally realistic model for building a cross-sector human trafficking response system.

With the foundation in place, the next chapter begins: deployment, refinement, and continued collaboration. This is not the end of the work. This is a continuation of the great work of all the law enforcement officers and victim service providers who came before and the unified technological launch pad for Oklahoma's fight against human trafficking.



III.

Appendix



REFERENCES

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ACRONYMS

- **ACISS:** Automated Criminal Intelligence System Software
- **AICPA:** American Institute of Certified Public Accountants
- **CAC:** Child Advocacy Center
- **CFR:** Code of Federal Regulations
- **CJIS:** Criminal Justice Information Services
- **CMS:** Case Management System
- **CWS:** Child Welfare Services
- **DHS:** Department of Human Services
- **DVIS:** Domestic Violence Intervention Services
 - *Oklahoma state-certified VSP
- **FVPSA:** Family Violence Prevention and Services Act
- **HB:** House Bill
- **HIPAA:** Health Insurance Portability and Accountability Act
- **HTRU:** Human Trafficking Response Unit
 - *Law enforcement unit within the Office of the Oklahoma Attorney General
- **IDA:** In-Depth Assessment
 - The In-Depth Assessment is used to make the final determination of trafficking. It requires detailed discussions of a potential victim's experiences and thus should only be used by those trained on trauma-informed interviewing.
- **LE:** Law Enforcement
- **LEADS:** Law Enforcement Assistant for Dismantling Sex Trafficking Networks
 - An all-source database built to support intelligence-driven investigations and disrupt trafficking networks with data discovery, integration, and analysis.
- **MDT:** Multi-Disciplinary Team
- **NCMEC:** National Center for Missing and Exploited Children
- **NHTTF:** Nebraska Human Trafficking Task Force
- **NNEDV:** National Network to End Domestic Violence
- **O.S.:** Oklahoma Statute
- **OAC:** Oklahoma Administrative Code
- **OAG:** Oklahoma Attorney General
- **OBNI:** Oklahoma Bureau of Narcotics
- **OCAT:** Oklahoma Coalition Against Human Trafficking
- **OCPD:** Oklahoma City Police Department
- **OJA:** Office of Juvenile Affairs
- **OK:** Oklahoma
- **OK PPG:** Oklahoma Information Security Policy, Procedures, and Guidelines
- **OMES:** Office of Management and Enterprise Services
- **OVC:** Office for Victims of Crime
- **PAVE:** Providing Avenues for Victim Empowerment
 - A survivor-centered platform guiding frontline professionals in identifying trafficking risk and supporting appropriate next steps to empower victims.
- **PHI:** Protected Health Information
- **PII:** Personally Identifiable Information
- **RMS:** Records Management System
- **ROI:** Release of Information
- **SANE:** Sexual Assault Nurse Examiner
- **SAR:** Suspicious Activity Report



- **SOC-2:** System and Organization Controls
- **SOP:** Standard Operating Procedure
- **TPD HTU:** Tulsa Police Department Human Trafficking Unit
- **TRA:** Trafficking Risk Assessment
 - The Trafficking Risk Assessment gathers key information to power the algorithm used to assess and visualize victim risk level.
- **TVPA:** Trafficking Victims Protection Act
- **VAWA:** Violence Against Women Act
- **VOCA:** Victims of Crime Act
- **VSP:** Victim Service Provider