



**Loyola Law School**  
Loyola Marymount University  
Sunita Jain Anti-Trafficking Initiative



May 1, 2026

Los Angeles County Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 W. Temple St, Room 381B  
Los Angeles, CA 90012

**RE: Motion on Strengthening Services for Youth Impacted by Human Trafficking and Support for the Department of Youth Development (DYD)**

Dear Members of the Los Angeles County Board of Supervisors,

We appreciate Supervisor Lindsey P. Horvath's leadership in introducing the motion, "*Strengthening Services and Aligning Resources for Probation and Foster Youth Impacted by Human Trafficking.*" We strongly support its focus on improving coordination, staffing, and service delivery for impacted youth.

The motion raises serious concerns about how support for youth impacted by human trafficking is currently working, including gaps in staffing, referral systems, coordination, and the use of existing resources. These concerns reflect what many of us working directly with providers and youth have been seeing for years.

The County already has a five-year strategic plan to address child trafficking. This plan provides a framework for full integration of programs and services and moves the County toward a public health approach. We have the tools to do better. The issue now is ensuring resources are directed and expanded in ways that support prevention, early identification, and access to services for all trafficked youth.

For too long, many young people impacted by trafficking have not been seen, supported, or given a real opportunity to heal. The County still has a long way to go to build systems that reflect a true public health approach focused on prevention and early identification.

The motion's focus on underspending within programs, including probation or programs waiting for referrals from law enforcement agencies, does not fully address the root issue. For many years, experienced advocates have raised concerns about the County's reliance on probation and law enforcement as the primary entry points for identifying trafficked youth.

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At the same time, departments such as the Department of Youth Development (DYD), Public Health, and the Los Angeles County Unified School District (LAUSD) cannot be expected to shift this trajectory without sufficient funding, time, and system level changes. This work will take sustained investment and coordination.

SJI is writing to more fully explain the support and resources needed for DYD to effectively engage and support youth impacted by trafficking. This includes updating intake and assessment practices and expanding training and technical assistance, while also strengthening access to specialized services for crime survivors.

If DYD is expected to play a larger role in anti-trafficking efforts, these gaps must be addressed to ensure youth are identified early and connected to appropriate services for crime victims, even though DYD was originally designed to serve youth in diversion programs.

### **1. Intake and Assessment: Youth Are Not Identified Early**

The motion highlights that referral systems are not working as they should, noting low referral numbers and ongoing challenges in connecting youth to available services.

As a result, many youth who are already experiencing human trafficking are not being identified during intake or early interactions with systems. If youth are not identified, they are not referred to services, and the support that exists never reaches them.

Youth experiencing trafficking often remain invisible in County data, which contributes to unspent funding because services are never triggered.

This also points to clear gaps in intake and assessment processes. Based on my experience working with services providers contracted with DYD, standard intake processes do not include screening for human trafficking, including both sex and labor trafficking. In addition, required intake forms tied to DYD funding do not capture this information.

In 2025 and 2026, SJI conducted trainings on labor trafficking and forced criminality to 7 community-based organizations supported by DYD. As part of this work, we reviewed intake forms used by these organizations and suggested specific language to support identification of both sex and labor trafficking, including forced criminality, which refers to situations where youth are coerced or forced into illegal activity as part of their exploitation, at the initial intake stage.





Providers were receptive and open to updating their intake practices. However, they identified a key barrier. The standardized intake system required by County for DYD funded programs does not currently allow for these updates to be incorporated. This means that even when providers are trained and willing to identify trafficking, the system itself limits what can be documented and addressed.

Universal intake tools used by DYD service providers must be designed to support early identification of trafficking, including situations where youth are being exploited or forced into illegal activity.

To address these gaps, DYD should strengthen intake and assessment by:

- incorporating trauma informed screening questions for both sex and labor trafficking
- including clear indicators of coercion, exploitation, and forced criminality
- ensuring that identification does not rely on law enforcement involvement

Further, DYD funded diversion programs are intended to receive referrals from local law enforcement instead of youth being arrested. However, because the First Responder Protocols (FRP) were not updated in 2025 to include comprehensive screening for sex and labor trafficking, especially labor trafficking involving forced criminality, law enforcement agencies have not been given clear guidance on how to refer these youth.

As a result, youth who are experiencing labor trafficking through forced criminality may still be arrested instead of being referred to either trafficking specific advocacy programs or DYD diversion providers. This gap should be addressed in 2026 so that more youth are identified and referred to services instead of entering the justice system.

Finally, schools are an additional and often safer point of identification and referral for youth impacted by trafficking. Schools can provide a more trusted and trauma-informed environment for early identification. However, despite the Child Trafficking Subcommittee on Education and Awareness spending 2025 vetting and reviewing qualified programs to increase identification and training in schools, no funding was allocated to pilot this work or begin collecting evidence-based data.

This gap is especially concerning given that the County has already identified available funding for prevention efforts. DCFS has proposed using \$100,000 of \$400,000 in unspent funds toward a





Human Trafficking Training contract to support prevention education curriculum development, survivor consultation stipends, and prevention and intervention workshops.

In 2026, funding must be allocated to pilot programs that support prevention, early identification, and referrals from schools to DYD so the County can begin collecting evidence-based data and make informed decisions about how to best support vulnerable youth.

## **2. Training and Technical Assistance: Building Foundational Knowledge and Expanding Access to Specialized Services**

Community-based organizations that currently receive funding for diversion programs through DYD are uniquely positioned to identify and respond to the needs of youth impacted by trafficking, including both sex and labor trafficking, especially labor trafficking involving forced criminality.

These organizations are located in the communities they serve, often in the same neighborhoods where young people live. Based on our outreach and training, we also believe that many current caseworkers may have their own lived experience with exploitation, including labor trafficking through forced criminality in their own youth. Because of this, they represent a strong source of peer advocates, which is a recognized best practice in trafficking services.

We have also observed that DYD supported providers are able to build real relationships and trust with young people. Many youth feel safer going to organizations based in their own communities rather than to traditionally funded trafficking advocacy providers that work closely with law enforcement. This is especially true for youth who have had negative experiences with those systems in the past.

However, DYD funded organizations need more support to fully meet the service needs of youth impacted by trafficking.

Through my work with DYD-supported providers, I have seen firsthand the need for more specialized training. Many providers do not yet have a strong foundation in trauma, trafficking dynamics, or the ways young people are exploited. This includes situations where youth are coerced into criminal activity and then punished for it, rather than recognized as victims.

Providers may also have difficulty identifying less visible forms of trafficking, such as family-based labor exploitation or work in informal settings. In addition, many providers report that they do not feel confident identifying trafficking without relying on law enforcement involvement.





Targeted funding should be used to expand training and technical assistance so providers can identify trafficking within the population they already serve. This investment should ensure that DYD providers are equipped with trauma informed and survivor centered approaches.

This should include:

- training on labor and sex trafficking dynamics, including forced criminality
- training on trauma informed and youth centered approaches to engagement and care for crime victims
- ongoing technical assistance to support providers in applying this knowledge in practice

These efforts will help ensure that providers are able to identify trafficking and provide an appropriate initial response for youth experiencing exploitation.

Even when youth are identified as trafficked by DYD providers, their current service provision model and access to specialized services for crime victims remain limited. Many providers need additional skill building to properly serve youth as crime victims, as well as additional support to expand current programming or connect youth to the full range of services needed for stabilization and recovery.

Additional funding is needed to support access to specialized trafficking services, including immigration relief, assistance through the California Victim Compensation Board, legal services, and comprehensive case management for crime survivors. These services are critical to helping youth stabilize and recover. At the same time, DYD providers will need additional support and training to deliver or connect youth to this level of care.

To address this, the County should:

- expand access to immigration, legal, and California Victim Compensation Board services for youth impacted by trafficking
- strengthen partnerships between DYD supported providers and specialized service organizations
- provide training and guidance to help providers connect youth to these services
- ensure funding supports DYD in expanding ongoing case management, stabilization services, and access to specialized services for crime survivors





### **3. Reducing Over Reliance on Law Enforcement**

There is still too much reliance on law enforcement to identify and refer trafficked youth, even though many young people do not feel safe engaging with these systems. This approach does not align with the public health approach the County has committed to, which focuses on prevention, early support, and healing.

Instead, the County should invest more in community-based organizations that are trusted, accessible, and better positioned to engage young people early and provide ongoing support.

Many of the youth who enter probation systems have experienced significant adversity, including abuse, neglect, violence, and instability at home and in their communities. These experiences increase their vulnerability to trafficking, including situations where they are forced or coerced into committing crimes for the benefit of others. As a result, youth are often arrested or enter the probation system even though their actions are directly connected to their exploitation.

Because of this, trafficked youth are often labeled as offenders and pushed through systems that do not fully address what they have experienced. This can lead to further harm, deeper system involvement, and missed opportunities for support.

At its core, what we are seeing is a response to pain and survival. Youth are often reacting to trauma and coercion, yet are treated as offenders rather than victims in need of care. What young people need is access to trusted mentors, mental health care, stable housing, and community-based programs that recognize their experiences and support their healing.

Supervisor Lindsey P. Horvath's motion highlights what many in the community already know. Youth are being left without the support they need, not because resources are unavailable, but because systems are not working together effectively.

If the County is serious about addressing human trafficking, it must ensure that law enforcement is not the primary referral source for this population. Schools, the Department of Youth Development, and community-based providers should serve as the primary points of identification and referral for trafficked youth.

At the same time, law enforcement must be equipped with the tools and training to immediately refer youth to services and avoid arresting children who are victims of trafficking, including those experiencing forced criminality.





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The five-year strategic plan to address child trafficking provides the framework for full integration of programs and services for all trafficked children. We have the tools to do better. Now the County must direct and expand resources to support prevention, early identification, and services for all trafficked youth, based on evidence informed approaches.

Sincerely,

*Paloma Bustos*

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