



Sheltering Minor Victims of Human Trafficking in Ohio January 2017

I. Introduction

Housing is a foundation for economic stability and protection. For individuals seeking to rebuild their lives after experiencing exploitation, safe short and long-term housing options support a successful recovery. This paper provides brief guidance to organizations seeking to offer housing for minor victims of trafficking in need of short-term and/or long-term housing assistance.¹ The guidance covers: 1) Basic information on the needs of trafficked minors that should be addressed by a housing provider; 2) An overview of Ohio's state agency licensure and regulatory requirements for providing residential housing for minors; and, 3) A brief directory of residential facilities and drop-in centers currently providing housing and shelter to minors in the state.

The data are unclear on the extent to which there is demand for beds across the state. In order to obtain better information about housing needs for minors, the Office of Criminal Justice Services will survey anti-trafficking coalitions and service providers participating in its quarterly coalition survey.²

II. Housing and shelter needs facing minor survivors of trafficking

Human trafficking victims often suffer from situations of complex trauma and recovery needs, including homelessness, substance abuse, reproductive health issues, physical and emotional trauma resulting from violence or extreme working conditions, malnourishment, and poor mental health.³ Additionally, due to control tactics and manipulation used by traffickers, the trauma bonds⁴ that minor victims form with their traffickers may be difficult to break. As a result, minor survivors of trafficking often require extensive assistance from social services⁵, as the violence and trauma children face are often mistaken for love and affection.⁶

¹ It is important to acknowledge that the U.S. Department of Housing and Urban Development is expected to publish guidance on housing survivors of trafficking in the near future, and this pending guidance should be accounted for when considering housing options.

² In collaboration with the Ohio Network of Anti-Human Trafficking Coalitions, between January and June 2016 the Office of Criminal Justice Services completed a statewide assessment of human trafficking survivors identified and served by the human trafficking coalitions in Ohio, as well as the number and groups of individuals trained by the coalitions.

³ Schwarz, C., Ph.D., Unruh, E., BSN, MPH, Cronin, K., Evans-Simpson, S., Britton, H., Ramaswarny, M. (2016). "Human Trafficking Identification and Service Provision in the Medical and Social Service Sectors." *Health and Human Rights Journal*. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5070690/>

⁴ Trauma-bonding is a form of coercive control in which the perpetrator instills in the victim fear as well as gratitude for being allowed to live. (U.S. Department of Health and Human Services, Office on Trafficking in Persons.)

⁵ "Guidance to States and Services on Addressing Human Trafficking of Children and Youth in the United States." U.S. Department of Health and Human Services, Administration for Children, Youth and Families. https://www.acf.hhs.gov/sites/default/files/cb/acyf_human_trafficking_guidance.pdf

⁶ "Homelessness, Survivor Sex and Human Trafficking: As Experienced by the Youth of Covenant House New York." 2013. Covenant House. <https://d28whvbyjonrpc.cloudfront.net/s3fs-public/attachments/Covenant-House-trafficking-study.pdf>

Therapeutic shelter, particularly with peer-support, is a critical means to helping young victims address these issues and become thriving survivors.⁷ Individuals engaged in peer services play a vital role in laying the foundation for sustained recovery.⁸ Peer support environments addressing specific needs can yield important benefits, including improved quality of life, wellness promotion, improved coping skills and compliance (e.g. medication adherence), reduced concerns and increased satisfaction with their current health status.⁹ Organizations interested in providing trauma-informed care and shelter for exploited and trafficked minors should carefully consider these factors.

III. How to provide residential shelter for exploited minors in Ohio

In Ohio, organizations interested in providing group housing for exploited children are required to obtain appropriate certification and/or licensure and follow the regulations set forth by the regulating agency. The three key state agencies regulating shelter include the Ohio Department of Job and Family Services, the Ohio Department of Mental Health and

“Residential service providers must have staff who are knowledgeable about the state and local child welfare and juvenile justice policies and practices.”

- *National Colloquium 2012 Report*

Addiction Services, and/or the Ohio Department of Developmental Disabilities, depending on the applicant’s mission and goals. Each agency’s regulatory and application process was created to ensure that minors reside in safe and healthy environments as service providers undertake the intricate task of providing shelter to youth and children who have experienced complex trauma.

Potential housing providers should understand the multifaceted legal and compliance aspects of providing housing to youth and children. A national inventory of domestic shelter and service providers concluded that “service providers who consider offering residential services should engage an individual that has expertise in the regulatory and compliance aspects of licensing. Residential service providers must have staff who are knowledgeable about the state and local child welfare and juvenile justice policies and practices.”¹⁰ The following sections provide an overview of Ohio’s state agency application processes and applicable regulations associated with operating a youth residential facility in the state.¹¹

Overview of General Application Process

State licensing agencies require that interested organizations obtain proper certification and/or licensure prior to operating a residential facility for minors. This process varies by state agency. Below are brief process overviews to consider when applying for licensure through the Ohio Department of Job and Family Services and the Ohio Department of Mental Health and Addiction Services. Service providers may also need to apply for licensure from

⁷ Ibid

⁸ Ohio Mental Health and Addiction Services, Peer Support Program. <http://mha.ohio.gov/Default.aspx?tabid=712>

⁹ “Best Practices Identified for Peer Support Programs.” Defense Centers of Excellence for Psychological Health and Traumatic Brain Injury (DCoE). 2011.

¹⁰ “National Colloquium 2012 Final Report: An Inventory and Evaluation of the Current Shelter and Service Response to Domestic Minor Sex Trafficking.” May 2013. ECPAT USA, Shared Hope International, The Protection Project, Johns Hopkins University. <http://sharedhope.org/wp-content/uploads/2012/09/National-Colloquium-2012-Report.pdf>

¹¹ The regulatory guidance included is not comprehensive, and all organizations interested in providing housing options should contact the appropriate licensing agency for additional information.

multiple agencies depending on the services provided. For example, if a residential facility for minors also provides on-site mental health treatment, that agency would need to receive licensure from both the Ohio Department of Job and Family Services and the Ohio Department of Mental Health and Addiction Services. Organizations interested in serving individuals with developmental disabilities should refer to the Ohio Department of Developmental Disabilities' Residential Facility Development Application.¹² Drop-in centers and shelters fall under separate regulations depending on their funding sources and certifications, often times provided by the Ohio Development Services Agency, as detailed below.

Ohio Department of Job and Family Services

In order to apply for certification, applicants are required to submit the following information: name and credentials of the potential agency administrator, name and address of the agency, proposed purpose and function of the agency, program type and anticipated size, specific services to be provided, proposed staffing plan, sources of funding and plan for ongoing funding, and anticipated sources from which children will be referred.

Additionally, if the agency is incorporated, applicants must submit a copy of the current Articles of Incorporation. If the agency is not incorporated, applicants must submit a copy of its proposed Articles of Incorporation and three letters of reference for each incorporator verifying that the person is "reputable and respectable"¹³ and a check to cover the filing fee required by the Secretary of State. After the Ohio Department of Job and Family Services reviews the submitted application materials, a certification specialist will contact the applicant to schedule an onsite inspection. Interested organizations can receive an application packet, additional information, or speak with a certification specialist by contacting the Office of Families and Children Help Desk at (866) 886-3527, emailing fostercare_licensing@jfs.ohio.gov, or filling out an online inquiry form.¹⁴ The information submitted will be sent to agency licensing staff who will review the request and reach out to continue the licensing application process.

Ohio Department of Mental Health and Addiction Services

Residential facilities operating a public or private home or facility serving minors with mental illness require licensure by the Ohio Department of Mental Health and Addiction Services. There are two types of Residential Facility Licenses for serving minors: A Type 1 license is for providers of room and board, personal care, and certified mental health services to one or more adults, children or adolescents. A Type 2 license is for providers of room and board and personal care services to one or two adults, or children or adolescents. Interested service providers can find the licensure application and necessary attachments respective to the residential facility license type on the agency website, or call the Bureau of Licensure and Certification for more information at (614) 644-8317.¹⁵

The Ohio Development Services Agency

¹² Ohio Department of Developmental Disabilities: Residential Facility Development Application. Last updated 8/1/15. <http://dodd.ohio.gov/IndividualFamilies/WhereILive/Documents/DevelopmentApplication.pdf>

¹³ Pursuant to Ohio Revised Code 5103.04

¹⁴ View the online inquiry form here: <http://jfs.ohio.gov/ofc/ofc-form/index.stm>

¹⁵ Ohio Department of Mental Health and Addiction Services licensure application and standards and rules can be found here: <http://mha.ohio.gov/Default.aspx?tabid=255>

The Office of Community Development within the Ohio Development Services Agency assists local communities in meeting the needs of vulnerable populations by providing grant funding to local governments and non-profit organizations operating homeless outreach, emergency shelters, homelessness prevention, rapid re-housing, transitional housing and permanent supportive housing. While the Ohio Development Services Agency serves as the state-level governing body, there are eight regional entitlement “continuum of care” organizations which serve as local supports for shelters operating within their respective regions. These organizations can then apply for operational and financial support, as the agency administers federal and state funding. Organizations interested in homeless and supportive housing programs can contact the Office of Community Development at (614) 466-2285.

Regulations

All organizations operating a children’s residential center are responsible for reviewing and abiding by the rules and regulations in the Ohio Administrative Code and the Ohio Revised Code. Below is a brief summary of the rules and regulations set forth by the Ohio Department of Job and Family Services and the Ohio Department of Mental Health and Addiction Services as they pertain to operating residential facilities for minors. This summary is not comprehensive, and any interested organizations should carefully review all relevant code sections.

Ohio Department of Job & Family Services

Agencies operating a children’s residential center are responsible for abiding by the requirements in the Ohio Revised Code and the Ohio Administrative Code relevant to children’s residential centers, group homes and residential parenting facilities, as well as code sections relevant to the operation of foster care programs and adoption programs.^{16,17,18} These code sections cover a broad range of standard regulations by providing specific guidance for day-to-day processes, procedures and pertinent safeguards for servicing minors. The following sections highlight the applicable regulations listed in Ohio Administrative Code 5101:2-9 (one of several relevant code sections). For guidance specific to serving victims of human trafficking, review the Ohio Human Trafficking Commission Standards for Service to Trafficked Persons.¹⁹

Staff

Staffing regulations state that when children are present during waking hours in a residential facility, there needs to be at least one child care staff person for each ten children. Additionally, child care staff must be on duty providing supervision to children where two or more children are congregated to ensure an appropriate level of supervision. The regulations also provide clear standards for staff background checks, required levels of supervision, rules pertaining to the children of staff members, plans for emergency relief

¹⁶ Ohio Administrative Code (OAC) Section 5101:2-9, “Children’s Residential Centers, Group Homes, Residential Parenting Facilities” <http://codes.ohio.gov/oac/5101%3A2-9>

¹⁷ See also: OAC 5101:2-5, OAC 5101:2-7, OAC 5101:2-9, OAC 5101:2-48, OAC 5101:2-1-01, OAC 5101: 2-33, 5101:2-39, 5101:2-42, 5101:2-44, 5101:2-47, 5101:2-49, 5101:2-52

¹⁸ Applicable Ohio Revised Code (ORC) Laws: ORC Chapters 5103, “Placement of Children,” and 3107, “Adoption”

¹⁹ Ohio Human Trafficking Commission Standards of Service to Trafficked Persons. Developed through the Ohio Human Trafficking Commission. Revised April 2013. <http://humantrafficking.ohio.gov/links/Service-Standards.pdf>

staff, instructions for staff orientation and training, and detailed guidance on staff's use of physical restraint, care, supervision and discipline.²⁰

Facility maintenance

Facility-related regulations address the general maintenance of the residential facility, requirements for residential parenting facility and crisis care facility furniture, residential parenting facility and crisis care facility location and programmatic requirements, guidelines for living rooms, dining areas and lounges, bedrooms, bathrooms, kitchens and kitchen supplies, laundry facilities and building approval. Regulations also include requirements for children's crisis care facilities and information to be provided by residential facilities.²¹

Safety

Children's residential centers must pay careful attention to all safety regulations. Ohio Administrative Code provides rules for general safety, emergency planning and preparedness, fire safety, storage of hazardous materials and notification and documentation of critical incidents.²²

Healthcare

Healthcare regulations address all components that must be included in a written medical emergency plan, including current emergency telephone numbers for fire, emergency squad, police, poison control and security services, locations of first aid supplies, general instructions for medical emergencies including supervision of children, instructions in case of illness of a child, etc. Additionally, facilities must adhere to medication-related regulations which mandate facilities to document currently prescribed medications for the child and consult with the child's licensed health professional under circumstances listed in the Ohio Administrative Code.²³

Administrative protocols

Administration-related regulations require tracking admissions via admissions logs, providing residential facility handbooks to residents and their families, guidelines for visiting and communications, and creating a child and family complaint policy and procedure.²⁴ Below is a brief overview of minimal portions of the Ohio Administrative Code sections relevant to providers of mental health services.

Child behavior management

Rules include how to deal with children's money, recreation and leisure activities and equipment, personal belongings, hygiene, socialization and education, food and nutrition and transportation.²⁵

Ohio Department of Mental Health and Addiction Services

Any agency providing room and board, personal care, and certified mental health services to children or adolescents is responsible for reviewing and abiding by the general rules set forth by the Ohio Department of Mental Health and Addiction Services in the Ohio

²⁰ Ohio Administrative Code Sections 5101:2-9-02, 2-9-03, 2-9-21, 2-9-22

²¹ Ohio Administrative Code Sections 5101:2-9-04, 2-9-05, 2-9-18, 2-9-25, 2-9-26, 2-9-28, 2-9-29, 2-9-30, 2-9-31, 2-9-34, 2-9-26, 2-9-37

²² Ohio Administrative Code Sections 5101:2-9-06, 2-9-07, 2-9-08, 2-9-10, 2-9-23

²³ Ohio Administrative Code Sections 5101-2-9-09, 2-9-14

²⁴ Ohio Administrative Code Sections 5101-2-9-11, 2-9-15, 2-9-16, 2-9-24

²⁵ Ohio Administrative Code Sections OAC 5101-2-9-17, 2-9-18, 2-9-19, 2-9-20, 2-9-23

Administrative Code and Ohio Revised Code as they pertain to residential facilities and mental health service provision.²⁶ The rules included below are not comprehensive, but are a sample of key regulations applicable to operating residential facilities.

General rules for residential facilities

Rules include guidelines for conditions of full, probationary, and interim licenses, maximum resident and household capacity, fines, inspections, safety, nutrition, sleeping and living space, housekeeping and property maintenance, staff requirements and qualifications, resident rights and grievance procedures, and other general rules for residential facilities.²⁷

Additional rules for the provision of personal care

Rules outline provisions of personal care in facilities serving minors, as well as assistance with self-administration of medication.²⁸

Additional rules for the provision of mental health services

Rules provide staffing requirements for the provision of mental health services, including rules regarding the number of staff immediately available at all times, the use of volunteers and students, crisis stabilization units and other considerations.²⁹

IV. Conclusion

The task of providing housing to minor victims of human trafficking is both vital and complex. Organizations interested in providing residential services should carefully review the licensure requirements, relevant rules and regulations, and contact the appropriate regulating agency for additional technical assistance. Additionally, agencies interested in understanding the broader scope of shelter organizations serving survivors of human trafficking might want to consider resources offered by the National Human Trafficking Hotline³⁰, the U.S. Department of Health and Human Services³¹ and the U.S. Department of Housing and Urban Development.³²

Appendix 1 contains a brief directory of existing residential facilities and/or drop-in centers that serve minor victims of human trafficking in Ohio. The resource includes each agency's service area, contact information, and available services. In addition, the Ohio Department of Job and Family Services maintains an Agency Masterlist³³ of all foster care agencies certified and licensed by the agency, available for public use online.

For general inquiries regarding Ohio's human trafficking response, please visit <http://humantrafficking.ohio.gov> or contact the Anti-Trafficking Coordinator's Office at (614) 995-7986.

²⁶ See Ohio Administrative Code Sections 5122 for a comprehensive list of rules set forth by the Ohio Department of Mental Health and Addiction Services <http://mha.ohio.gov/Default.aspx?tabid=128#32641497-licensure-of-residential-facilities-5122-30>

²⁷ Ohio Administrative Code Section 5122-30

²⁸ Ohio Administrative Code Sections 5122-30-26, 5122-30-28

²⁹ Ohio Administrative Code Sections 5122-30-29, 5122-30-29

³⁰ <https://humantraffickinghotline.org/>

³¹ <https://www.acf.hhs.gov/otip>

³² <https://www.hudexchange.info/homelessness-assistance/human-trafficking/policy-tools-research/#laws>

³³ See full the Ohio Department of Job and Family Services' Agency Masterlist here:

<http://jfs.ohio.gov/WorkArea/DownloadAsset.aspx?id=2147644604>

APPENDIX 1: Current Housing & Drop-In Center Options for Minors

The Ohio Department of Job and Family Services, the Ohio Department of Mental Health and Addiction Services, the Ohio Department of Developmental Disabilities and others license and regulate a number of residential facilities in the state that provide shelter options to minor victims of trafficking or provide immediate crisis intervention. Generally, drop-in centers are not necessarily licensed by the Ohio Department of Job and Family Services or the Ohio Department of Mental Health and Addiction Services, but may receive funding or supportive services through their locality or the state. Additionally, for immediate assistance regarding an individual with a developmental disability, individuals should contact their Local County Board of Developmental Disabilities.³⁴ Below is a brief overview of several residential options for minors in Ohio.

Gracehaven (Central Ohio)

Area served: Priority is given to central Ohio, then Ohio, then the United States

Web address: www.gracehaven.me

Phone number: (614) 302-9515

Organization summary: Gracehaven operates a therapeutic group home in central Ohio that provides specialized, trauma-informed care for female victims of domestic minor sex trafficking. Gracehaven accepts both adjudicated and non-adjudicated girls between 12 and 17 years old. Clients are provided a six to twelve month safe living environment in a group home setting, and given individualized treatment planning that includes violence and exploitation recovery and prevention. Gracehaven's licensed clinical staff offer mental health counseling services by providing weekly individual therapy and daily group therapies, as well as life skills groups and assessments, physical activity, on-site educational services, weekly field trips and equine therapy. Additionally, the program provides basic physical care including clothing, transportation and food, and oversees needed medical care services for youth, including routine and emergency medical care.

Bellefaire JCB (Cleveland)

Area served: United States

Web address: www.bellefairejcb.org

Phone number: (216) 932-2800

Organization summary: Bellefaire JCB provides 24/7 treatment for minors with significant mental health and psychiatric needs, developmental disorders, demonstrated self-injuries, co-occurring mental health and substance abuse, experienced trauma, attachment issues, LGBTQ needs, and minors who have been victims of commercial sexual exploitation. Bellefaire JCB provides therapeutic techniques including cognitive behavioral therapy, dialectical behavior therapy and collaborative problem-solving through three programs: Crisis Stabilization and Assessments, Intensive Treatment, and Transitional Living. Each of these residential programs serve males and females and offer specialized treatments.³⁵

The Daughter Project (Northwest Ohio)

Area served: United States

Web address: www.thedaughterproject.org

³⁴ View the comprehensive list of Local County Boards of Developmental Disabilities with 24/7 contact information here: <http://dodd.ohio.gov/reportabuse/Pages/default.aspx>

³⁵ Males and females reside in different hallways, separated by a living space and staff offices.

Phone number: (419) 973-9831

Organization summary: The Daughter Project provides holistic healing services in a group home in northwest Ohio to female victims of sex trafficking. Services include physical and sexual abuse counseling, addiction counseling, family/friend restoration, health and nutrition education, medical/dental/vision care, legal counsel and spiritual mentorship. The Daughter Project works with doctors, counselors and other licensed professionals to provide medical care to their clients. The program provides life and social skills training, as well as in-house and online education with volunteer teachers. According to The Daughter Project Director Jeff Wilbarger, many clients suffer from association disorder and severe emotional trauma. “In most cases, our girls have never developed a good relationship with any adult at any time in their life.” To address this, The Daughter Project provides live-in house moms to help the girls begin to build relationships with adults.

Star House (Central Ohio)

Area served: Central Ohio

Web address: www.starhouse.ehe.osu.edu

Phone number: (614) 829-5752

Organization summary: Star House serves as a “one-stop-shop” drop-in center where homeless youth ages 14-24 can access resources to meet their basic needs and get connected with Columbus community resources. Youth can receive food, clothing, hygiene items and backpacks. Star House also offers walk-in appointments with two full-time therapists who individualize their treatment to meet youths’ needs through individual, couple or group therapy, and who connect youth with resources and serve as an advocate to help accomplish treatment goals. Star House connects with community partners to offer a full continuum of support including medical and dental providers, health and sexual wellness experts, employment services and recovery support groups. According to the Star House Research Coordinator, “Some of the youth really just need a place to meet their basic needs while they get back on their feet. They use our services to save money to be able to get an apartment.” Youth can continue accessing services for up to six months after achieving stable housing during the hours of 7:30 am – 10:00 pm.

Lighthouse Youth Services (Cincinnati)

Area served: Cincinnati

Web address: www.lys.org

Phone number: (513) 221-3350

Organization summary: Lighthouse Youth Services provides a wide range of shelter options in the greater Cincinnati area including: shelter and resources for homeless young adults ages 18-24, life skills and housing options for young adults ages 17-24 and residential treatment centers for youth in crisis ages 11-18. The two residential treatment centers (Youth Development Center for Boys and New Beginnings for Girls) offer long-term housing and extensive support services for youth with serious to severe emotional and behavioral problems combined with other needs to help clients overcome barriers and empower them to make positive changes for their futures. Specifically, each program has access to long-term case management, mental health services, and behavioral health services.