

Commercially Sexually Exploited Children Program 2017 Report to the Legislature



STATE OF CALIFORNIA
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**Commercially Sexually Exploited Children (CSEC) Program
Report to the Legislature
Legislative Mandate**

The CSEC Program was created by [Senate Bill \(SB\) 855](#) (Committee on Budget and Fiscal Review, Chapter 29, Statutes of 2014) and was implemented on January 1, 2015.

The SB 855 added Chapter 5.2 to the Welfare and Institutions Code, including section 16524.10 that requires the California Department of Social Services to report to the legislature on the implementation of the CSEC Program as follows:

The California Department of Social Services shall provide the following information to the Legislature regarding the implementation of this chapter:

- a) The participating counties
- b) The number of victims served by each county
- c) The types of services provided
- d) Innovative strategies relating to collaboration with children, child service providers, and survivors of commercial sexual exploitation regarding prevention, training, and services
- e) The identification of further barriers and challenges to preventing and serving commercially sexually exploited children

Additional copies of this report can be obtained from:

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This report also may be obtained on the [California Department of Social Services website](#).

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Executive Summary

SB 855 (Committee on Budget and Fiscal Review, Chapter 29, Statutes of 2014) clarified that Commercially Sexually Exploited Children (CSEC) may be served by the child welfare system and created the CSEC Program to do so. Counties that participate in the CSEC Program receive state funding to build local, multi-agency capacities, including the utilization of a multidisciplinary teams (MDT), to provide CSEC Program services. In its first year (2014), 35 counties participated in the CSEC Program. Goals for implementation included the facilitation of cross-system collaboration between the child welfare and probation systems, improved data collection and documentation practices, and the leveraging of existing connections to community and system partners to serve CSEC.

The implementation of the CSEC Program has been made possible by highly collaborative efforts among the California Department of Social Services (CDSS), the County Welfare Directors Association (CWDA), the Child Welfare Council CSEC Action Team, the Chief Probation Officers of California, county child welfare and probation departments, law enforcement, District Attorneys, and other community partners. These efforts include the development of a sample protocol to help counties understand and meet all new CSEC Program requirements, specialized CSEC trainings and the piloting of the West Coast Children's Clinic's (WCC) Commercial Sexual Exploitation-Identification Tool (CSE-IT). These efforts have contributed to a growing awareness of risk factors among system and community partners, and a resulting increase in the identification of victims or at-risk children who now benefit from a clearer pathway to services made possible by the CSEC Program. In the process of developing and implementing their CSEC interagency protocols, counties also have encountered various challenges, including CSEC not viewing themselves as victims, community partners not fully engaging in the effort, and the lack of suitable placement options for CSEC.

Background

State Funding Methodology

Funding for the CSEC Program comes from a combination of state and federal funds. Prior to implementation, CDSS consulted with CWDA to develop a two-tier funding allocation methodology in order to facilitate a higher level of funding to counties with a demonstrated need for additional resources, such as high-density trafficking regions. Counties who identified an existing CSEC population and developed interagency CSEC protocols or other such agreement such as a Memorandum of Understanding (MOU) were allocated the majority of the funding. The remaining funding was allocated to counties to assist with developing interagency CSEC protocols, training staff and developing CSEC specific services.

Participating Counties

Fiscal Year	County
2014-15	Alameda, Butte, Contra Costa, El Dorado, Humboldt, Kern, Los Angeles, Madera, Marin, Merced, Napa, Orange, Placer, Plumas, Riverside, Sacramento, San Benito, San Bernardino, San Diego, San Joaquin, San Luis Obispo, Santa Barbara, Santa Clara, Shasta, Sierra, Sonoma, Stanislaus, Tulare, Yolo, and Yuba.

Fiscal Year	Tier I	Tier II
2015-16	Calaveras, Colusa, Kern, Madera, Marin, Placer, Plumas, Shasta, Siskiyou, Solano, Tulare Ventura, and Yolo.	Alameda, Contra Costa, El Dorado, Fresno, Los Angeles, Merced, Monterey, Orange, Riverside, Sacramento, San Benito, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Sonoma, and Stanislaus.
2016-17	Colusa	Alameda, Calaveras, Contra Costa, El Dorado, Fresno, Humboldt, Kern, Los Angeles, Madera, Marin, Merced, Monterey, Orange, Placer, Plumas, Riverside, Sacramento, San Benito, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Shasta, Siskiyou, Solano, Sonoma, Stanislaus, Sutter, Tulare, Ventura, Yolo, and Yuba.

Supporting County Participation in the CSEC Program

CDSS has provided assistance to counties that have opted into the CSEC Program by disseminating the CSEC Action Team’s Memorandum of Understanding (MOU) Template, which integrates statutory requirements and best practices. CDSS also implemented changes in CWS/CMS to allow documentation of all referrals alleging a child or youth is at risk or a victim of commercial sexual exploitation (CSE) and to document all children or youth identified as at risk or victims of CSE as required. For more information regarding federal requirements and state legislation, see Appendix A.

Additionally, CDSS partnered with CWDA, the California Social Work Education Center and the CSEC Action Team to develop two trainings. The first training, CSEC 101: *Identification and Awareness*, provides tools to identify warning signs and provides the core elements of a successful CSEC identification, intervention, assessment, and treatment. The second, CSEC 102: *Engagement Skills for Working with CSEC and Transitional Age Youth*, builds on the first training and provides direct service providers additional in-depth strategies on engaging and working directly with survivors, as well as how to effectively establish and run an MDT. CDSS also partnered with the California Community Colleges Chancellor’s Office to conduct statewide training focused on awareness and identification of CSEC through the Foster and Kinship Care Education program for foster parents, kinship caregivers, and group home staff.

Number of Victims Served¹

County	Victims Served	County	Victims Served
Alameda	75	San Bernardino	13
Calaveras	0	San Diego	584
Colusa	0	San Francisco	171
Contra Costa	5	San Joaquin	40
El Dorado	7	San Luis Obispo	4
Fresno	29	San Mateo	84
Humboldt	20	Santa Barbara	5
Kern	81	Santa Clara	67
Los Angeles	150	Santa Cruz	3
Madera	16	Shasta	3
Marin	2	Siskiyou	2
Merced	17	Solano	15
Monterey	24	Sonoma	49
Orange	105	Stanislaus	15
Placer	14	Sutter	0
Plumas	1	Tulare	63
Riverside	124	Ventura	18
Sacramento	99	Yolo	3
San Benito	3	Yuba	0
Total		1,911	

The CSEC Program identified and served a total of 1,911 victims between July 1, 2015, and July 1, 2016. Although counties with smaller and more rural populations served fewer victims compared to larger, more urban counties, the ratio of victims served is significantly higher in proportion to county's' child welfare populations. For example, Los Angeles County identified and served 150 victims, which is less than two percent of youth ages 10 to 20 that are receiving child welfare services in that county. San Benito County identified and served three victims, which is more than 11 percent of youth ages 10 to 20 that are receiving child welfare services. This suggests there is vulnerability and a need for CSEC Program services even in counties where lower numbers of CSE victims are identified and served.

The prevalence statistic of CSEC is likely much higher than the figures represented above due to many factors, including underreporting and hesitancy by victims to self-identify. As counties continue to opt-in and implement the CSEC Program, and as awareness of the CSEC Program and associated services spreads, CDSS anticipates that the number of CSEC Program participants will grow.

Data sources for the CSEC Program include CWS/CMS, CSEC Program County Plans, and site visits. The function of the CSEC Data Grid in CWS/CMS and the categorization of referrals and cases were developed per the CSEC Program and the federal Title IV-E program requirements. For additional information regarding the development of the CSEC Data Grid and a complete list of the CSEC Type categorization, refer to [All County Letter \(ACL\) 15-49](#) and [ACL 16-49](#). For information on CSEC referral documentation, refer to [ACL 16-74](#).

Services

Under the CSEC Program, counties connect youth to many services and supports. Below are examples of the most prevalent and promising CSEC service interventions.

Mental Health Services and Case Management

There is an ongoing need for awareness and service capacity for CSEC with mental health, substance abuse, and/or developmental concerns that must be addressed with CSE. If co-occurring disorders such as these are not addressed, they may become a barrier to the youth engaging and receiving services. Some counties have begun addressing the needs of CSEC with disorders through assessments, funding substance abuse treatment, and contracting with mental health clinicians from outside counties. San Bernardino County established the Coalition Against Sexual Exploitation as the county's MDT, which assesses the youth for co-occurring disorders and discusses the case to ensure the treatment is focused on the need with the highest priority.

Trauma-informed mental health providers often travel to deliver services, even when youth move placements. For victims of exploitation, this can contribute to consistent and reliable services which can assist in developing strong therapeutic relationships. Some examples include WCC's C-Change Program in Alameda County, and the University of California, Davis' Child and Adolescent Abuse Resources and Evaluation Clinic in Sacramento, Yolo, and Yuba Counties.

Specialized Community-Based CSEC Advocates

These advocates provide youth the opportunity to interface with adults outside of public agency systems in order to bridge relationships with public systems youth tend to distrust. Los Angeles and San Francisco Counties employ these advocates upon first encounter with the child. Other counties are building capacity to employ and/or contract with such advocates.

Continuum of Placement Options

Placement strategies vary from emergency placement, to longer term housing. In Kern County, foster family agencies prioritize the recruitment and training of foster family homes for CSEC. Alameda County contracts with community providers to offer safe placement for 18-21 year-olds. Marin County enlists a Wraparound provider for 24-hour support to emergency foster parents. Sacramento County places CSE youth at their Children's Receiving Home for temporary housing while working to identify the most appropriate placement.

Addressing Gang Affiliation

Counties commonly serve CSEC who have gang affiliations through law enforcement-led diversion programs and taskforces, or through contracts with community-based organizations. For example, San Francisco County utilizes its community partner, Human Anti-trafficking Response Team, to connect youth to an intervention specialist that works with youth impacted by gang affiliation.

Fiscal and Vocational Training

Most counties utilize Independent Living Programs to assist current and former foster youth in achieving self-sufficiency prior to, and after leaving, the foster care system. Examples are Los

Angeles County's multi-agency collaboration approach to fund subsidized employment opportunities and Alameda County's approach to incentivize CSEC to participate in financial literacy trainings by providing them with gift cards.

Other

Some counties have executed contracts to provide emerging practices, including the following: distribution of humanitarian bags; tattoo removal; financial support for transportation (i.e., bus passes/transit vouchers); Dialectical Behavior Therapy; yoga; writing workshops; peer mentor programs; meditation; skill-building workshops; horticulture therapeutic programs; equine therapy; art therapy; skills training programs; camps; and wellness retreats.

Successes

CSEC Screening Tools

To address the dearth of data surrounding the prevalence of the problem and to better identify those children and youth who have been exploited and those who are at risk, a vast majority of counties now employ CSEC screening tools. Twenty-three county child welfare agencies employ the validated Commercial Sexual Exploitation- Identification Tool (CSE-IT), which was created and piloted by WCC. The WCC provided training and targeted technical assistance. Its identification tool is utilized in agencies beyond child welfare including probation, mental health, public health, rape crisis centers, women's centers, and schools. The remaining participating counties use a variety of similar screening tools.

Multidisciplinary (MDT) Teams

In 2015, CDSS disseminated [All County Information Notice \(ACIN\) I-23-15](#), which provided guidance to participating counties on structuring and developing interagency protocol for the implementation of the CSEC Program. This notice also included the CSEC Action Team's Model Framework, which provides guidance on forming an interagency steering committee, establishing an individualized MDT, and defining the responsibilities of each agency participating in the county's interagency protocol. This guidance was modeled after Los Angeles' Law Enforcement First Responder Protocol.

The structure of MDTs varies across counties. Many counties adopted the MDT structure outlined in the CSEC Action Team resources. This structure consists of a three-tiered approach triggered by the child's unique circumstances including the following: (1) immediate crisis response MDT within two to 23 hours upon identification, often initiated by a first responder encountering CSEC in the field; (2) initial response MDT within seven to 10 days when there is no immediate danger to the child; and, (3) ongoing MDT that meets regularly to complete big picture reviews of caseloads

Several counties chose to expand the MDTs membership by including agencies beyond the required parties including survivors, dependency attorneys, existing human trafficking task force representatives, victim advocates, education representatives, rape crisis or other community advocates, and law enforcement.

The remaining counties leveraged existing MDT structures to serve CSEC and receive CSEC Program funding. These structures include Child and Family Teams, Multi-Agency Case

Staffing meetings for dual status youth, and existing human trafficking MDTs. The variance in MDT structure indicates that counties are developing approaches in a manner that best fits their existing infrastructure and agency protocols.

In 2015, 21 counties sent their MDTs to the CSEC Program Convening at *Beyond the Bench* training conference. At this event, attending MDTs received training on new CSEC Program requirements, completed county team exercises, and connected with counterparts from other counties to learn how they have addressed similar challenges in identifying and serving this population. This unique, day-long convening was coordinated by the CSEC Action Team, the Judicial Council of California, and CDSS.

Improved Collaboration and Reduced Stigma

Counties have shared that, through implementation of the CSEC Program, a common language and framework through which partners across disciplines can communicate has been established, which has been crucial to shifting perceptions about this population. For example, Fresno County reported that CSEC have historically been viewed as criminals and not victims, but as the CSEC Program has created a space for professionals across disciplines to come together and address the CSEC population, negative perceptions of this population have begun to change. To bolster this impact, counties have launched local and regional public awareness campaigns, and have provided frequent and high-quality training of social workers, probation officers, and other key players in CSEC identification and service delivery. (Beginning September 2016, counties were required to train social workers and probation officers per [SB 794](#). Many counties have exceeded these requirements by extending trainings to foster care providers, educational liaisons, community providers, and youth.)

Empowered Community Partnerships

Counties have reported increasing interest from potential partner agencies and local communities. For example, Yolo County reported that CSEC Program implementation allows them to pilot a program that co-locates a child welfare social worker for three hours a week at a local police department. The social worker serves as a liaison with the proposed outcomes of increasing cross-reporting and education across multiple agencies, working in specific jurisdictional areas. This helps law enforcement and other first responders rethink their engagement strategies with CSEC.

Enhanced Strategies for Vulnerable Children

Collaborative efforts led by CDSS and the CSEC Action Team, including the facilitation of cross-agency dialogue and distribution of resources such as the MOU Template and regular technical assistance webinars, will further improve outcomes for all vulnerable children in California, not just CSEC. The services and innovative strategies that are emerging from the development and implementation of the CSEC Program can be applied to the spectrum of needs of children in the child welfare and probation systems.

Innovative Strategies

Beyond the federally required data collection through the statewide case management system CWS/CMS, CDSS collects information regarding the CSEC Program's successes through County Plans and site visits. These sources revealed trends and commonalities across the opt-in counties and identified innovative strategies that have resulted in the ability

for counties to better address the needs of CSEC.

Community-based CSEC Advocates

In Alameda County, CSEC advocates are embedded in the agency's Assessment Center, recognizing that most CSEC will come to the Center multiple times before they stabilize. Having a supportive and consistent presence of trained advocates, who are often survivors themselves, is critical to youth engagement and eventually engaging with a more structured support system. Many other counties (i.e. Calaveras, Los Angeles, Marin, San Diego, San Francisco, San Joaquin, and San Mateo) are following suit and hiring and/or contracting with specialized CSEC Advocates to support their responses.

Leveraging Available Resources

The Tri-County regional approach allows three counties to leverage funding collectively. Collaboration enables them to employ expert consultants, and contract with service providers to serve the CSEC population in the region, without limiting service provisions to a single county's jurisdictional border. This protocol allows for continuity of care if the child moves to a placement outside of the county of origin but within the Tri-County region. The Tri-County collaborative also partners with the Coalition to End Human Trafficking, which is comprised of organizations, businesses, and individuals that provide outreach and prevention education. This promising practice, while innovative to the statewide response to CSEC, has been challenging in practice as each of the three participating counties are at different stages of their implementation processes.

In some jurisdictions, the steering committees identified and partnered with existing community services. The Tri-County collaboratively enlisted the services of both the sexual assault and child abuse victim response teams, provided CSEC training to both response teams, and hired a CSEC survivor to join the Sexual Assault Response Team. This enabled these teams to provide support as specialized advocates alongside public agencies.

Counties also enlisted the services of community-based domestic violence and sexual assault organizations. Sacramento County partners with Women Escaping a Violent Environment (WEAVE) to provide 24-hour crisis intervention and case management, therapeutic counseling, and outreach and education. This includes dispatch of a CSEC advocate within 45 minutes of a call to WEAVE's crisis hotline to engage and help stabilize the youth. Stanislaus County partnered with Haven Women's Center to provide a support person to accompany CSEC to the hospital for sexual assault exams and provide support following the exam.

Several counties reported utilizing their Trafficking Task Force to lead prevention efforts, including outreach to businesses, such as hotels and bars. These partnerships aim to increase awareness and identification of businesses that, at no fault of their own, may be frequented by exploiters for CSE purposes. This outreach has increased law enforcement presence in those high trafficking areas, promoted dialogue between public and private sectors, and increased CSEC education and awareness in the community.

Another example of successful leveraging of existing resources is the Riverside County Anti-Human Trafficking Task Force, which partners with Million Kids to coordinate outreach and training efforts. The Million Kids organization educates and spreads human trafficking and

child pornography awareness to first responders, government agencies, civic leaders, school administrators, medical personnel, faith-based organizations, parents, and grandparents. Million Kids increases knowledge about how predators operate and how to prevent young people from becoming victims of exploitation. Riverside County also utilizes media as a form of outreach and promoting community awareness related to CSEC as it provides weekly podcasts aimed at promoting education and awareness about CSEC of children and youth.

Specialized Courts

Some counties established or engaged existing dependency and/or delinquency courts with dedicated calendars to hear cases related to CSEC. Although each courtroom is unique, there are core components present in all of them, including consistency among the staff so youth see the same familiar faces each time they come to court. A youth's case is also heard on a more frequent basis to build rapport and to ensure close monitoring. These courts make most decisions using a multidisciplinary body, where all parties weigh in on placement and service decisions while prioritizing the youth's voice. Such courts are located in Alameda, Los Angeles, Orange, Sacramento, San Diego, and San Francisco Counties.

Creating CSEC placements and supporting placement providers

To mitigate barriers in identifying CSEC appropriate placements, counties collaborate on engagement and supportive strategies for placement providers interested in this population. For example, early in its work with the CSEC Program, Los Angeles County convened a roundtable of placement providers that were willing and interested in serving the population. The roundtable has provided a forum where placement providers are able to learn from one another and has increased Los Angeles' capacity in housing and placing this population.

Specialized Agency Units

Several counties hired specialized staff and/or formed specialized CSEC units in both probation and child welfare. The units received extensive CSEC training and have reduced caseloads and participate in MDTs. This fostered trust and built the foundation for strong, meaningful relationships between social workers, probation officers, and youth. This vulnerable population often requires staff to be available around-the-clock to respond to crisis and immediate safety concerns. The common occurrence of CSEC running-away from placement requires social workers to spend an extensive amount of time attempting to locate, reengage and report the missing youth. Social workers can also spend time monitoring social media accounts of youth to identify potential exploitation and exploiters. Alameda, Fresno, Orange, San Bernardino, San Diego, San Joaquin, Riverside, Sacramento, Sonoma, and Ventura Counties reported hiring specialized CSEC staff.

Systematic Engagement of Survivors in CSEC Policy Development and Service Delivery

Sixteen participating counties have engaged survivors in their efforts, including hiring survivors as agency staff, adding survivors to their steering committees, seeking survivor input on their protocols, and contracting with survivors or survivor-led organizations for service delivery. Counties and community agencies have also engaged members of the CSEC Action Team Advisory Board, which is comprised of ten adult survivors of child sex trafficking and is the first state-sponsored committee of its kind. It is tasked with ensuring state policy and practice guidelines ensuring CSEC are survivor-informed and survivor-driven whenever possible. Survivors have provided consultation including debriefs for youth returning to care after being

absent without leave, campaigns to attract resource families to serve CSEC, and input on prevention curricula.

Partnering with Specialized Providers to Address Difficult to Identify Populations

The CSEC Action Team's research briefs stress that Lesbian, Gay, Bi-Sexual, Transgender, and Questioning (LGBTQ) youth may be at increased risk of CSE due to their overrepresentation in the homeless youth population and a history of caregiver rejection. To increase awareness and staff competency, Los Angeles County partners with community organizations that provide services addressing the needs of LGBTQ foster children and youth. The Recognize Intervene Support Empower (RISE) initiative is intended to reduce the number of LGBTQ children in long-term foster care and help them find loving, permanent homes. The RISE initiative provides LGBTQ training in English and Spanish for resource families (foster parents), county staff, and public and private agencies to improve their knowledge and understanding of the LGBTQ community. The training curriculum provides foundational information that supports families and best practices for serving LGBTQ children.

Forming Bodies to Monitor Implementation of Protocols and Processes

Many of the steering committees formed at the onset of program implementation or subgroups continue to meet as a means of monitoring implementation. For example, Los Angeles County's Multi-Agency Review Committee (MARC), which oversees implementation of their First Responder Protocol, meets monthly to review cases, identify successes, discuss barriers, and ensure successful utilization and further expansion of the protocol pilot countywide.

Challenges

Since implementation of the CSEC Program began, a number of common challenges have been identified. Below is a list of challenges that CDSS and its county partners would like to address in the subsequent years of the CSEC Program.

Receptivity to Assistance

CSEC are typically suffering from severe, layered trauma, and the overwhelming majority do not recognize themselves as victims and are conditioned to be suspicious of system agents. For many CSEC, it often takes many attempts to engage in systems of support before they can make significant progress towards long-term stabilization. Expecting and allowing such harm reduction behavior and meeting a youth's needs with a strengths-based approach is often uncomfortable, but is an approach that many child-serving agencies have found to be productive.

Placements

A universally acknowledged barrier to effectively serve CSEC are insufficient suitable placement options. Counties cite a lack of resource families (foster families), specifically those that have been specially trained, as well as emergency shelters and longer-term housing.

Adequately Serving and Supporting Parents/Families

There is a lack of readily available resources to assist parents of CSEC, either through prevention or intervention, in keeping youth safe in their homes.

Identification and Documentation by Counties

Some counties have not identified any CSEC or at-risk children. This does not mean CSEC do not exist in these counties, and data and documentation practices are still being improved within counties. Some counties are increasing awareness and CDSS continues to provide technical assistance to counties to address confusion around CWS/CMS six code data grid and the new referral special project code.

There are not yet enough identified best practices, services, and appropriate placements to identify and serve gender-fluid and LGBTQ youth. Counties and research indicate these youth are significantly more likely to be CSE without a third-party exploiter in order to meet basic survival needs.

Engaging All Critical or Mandated Stakeholders

While many counties reported functioning and promising partnerships across agencies, some shared that critical partners were not fully engaged in the effort. Agencies may have difficulty navigating a collaborative approach while also maintaining fidelity to their own internal obligations.

Staff Turnover and Training

Staff turnover has an impact on CSEC Program training as agency staff and community-based providers need introductory and in-depth CSEC training to meet the responsibilities defined in the agency protocol. Without such training, there can be significant breakdowns in the Program's implementation. Agency staff and community-based providers need a basic understanding of the issue, which is provided through CSEC 101. They also need more in-depth, practice-focused knowledge on how to effectively engage the population and run MDTs. Additionally, each community-based provider needs to train staff on the roles and responsibilities defined in the interagency protocol. As counties continue to experience high turnover rates, time and resources are spent retraining new staff, while previous knowledge and practice wisdom are lost.

Documentation and Data Reporting

Appropriate documentation of CSEC data is necessary in order to capture accurate data from CWS/CMS. Although all participating counties provided CSEC data through the County Plans, 32 of the 38 participating counties documented CSEC data in CWS/CMS due to challenges including: multiple system changes and documentation instructions, system limitation, and appropriate training with high staff turnover. Additional information regarding data limitation from CWS/CMS, County Plans, and county visits is provided in Appendix B.

Short Timelines and Spending Limitations

A total of \$38 million State General Fund has been allocated for the CSEC Program since FY 2014-15. Counties are completing their protocol development and entering stages of implementation by directing funding towards outreach, preventative services, and specialized CSEC intervention services. Progress thus far has resulted in an increase in the number of referrals and identification of at-risk and CSEC victims, which necessitates a need for services.

However, developing and distributing Request for Proposals and executing contracts with community service providers and trainers may take up to one year, posing a challenge for counties to spend available funds by the end of each fiscal year.

Recommendations

Improving Identification and Awareness

The CSEC prevalence data gathered from CWS/CMS, County Plans, and through discussions during the county visits, demonstrate that as awareness increases, so does the number of CSEC referrals and identified victims. Counties not participating in the CSEC Program have also identified CSEC within their county. Tribal communities and smaller rural counties may have an unidentified and unserved CSEC population due to a lack of awareness and skills to identify the population. It is recommended that tribal communities and counties continue to better learn their prevalence through trainings in identification and awareness. These trainings must be offered to all professionals engaging with CSEC. For that reason, CDSS will continue to strategize innovative ways in which counties can implement CSEC awareness campaigns within their communities. Further, CDSS is encouraging counties to utilize specialized screening tools intended for use during hotline reporting calls and emergency response investigations.

Revise Data Collection Strategies

As child welfare begins to improve their identification of CSEC, there needs to be a better means of documenting their findings. It is recommended counties develop and implement more frequent and ongoing documentation education to social work staff, as high staff turnover continues to be a challenge. Once social workers better understand how to appropriately document their caseloads, we can begin to better understand the degree of the population. Further, counties must continue to have opportunities to share barriers and strengths of documentation strategies while CDSS continues to build the new case management system.

Increasing Collaboration

This population is best served through steadfast collaboration of multi-agencies across counties because of their transitory nature. Therefore, CDSS will continue to support the collaborative efforts between the child welfare, law enforcement and probation systems, as well as local education agencies, in the development of cross-county CSEC Protocols which identify means of coordinating care and service delivery. Additionally, tribal communities should be a more engaged partner in this partnership. Counties should consider creating multidisciplinary task forces consisting at minimum of child welfare, probation, law enforcement, public health, mental health, placement providers and advocates to support youth and social workers serving CSEC.

Appendix A

New Federal Requirements and State Legislation

Soon after the passage of [SB 855](#) (Chapter 29, Statutes of 2014), federal legislation was enacted which further contributed to California's capacity-building efforts to service CSEC. On September 29, 2014, the President signed into law the [Public Law \(PL\) 113-183](#), which included amendments to Title IV-E of the Social Security Act that addresses child/youth sex trafficking. The Act's requirements were incorporated into state law with the passage of [SB 794](#) in 2015, adding [Welfare and Institutions Code section 16501.35](#), which requires all county child welfare and probation departments to implement policies and procedures related to CSEC who are receiving child welfare services, and protocols to expeditiously locate any runaway/missing children/youth from foster care. SB 794 also added Penal Code sections 11166(j)(2) and (3), requiring immediate cross-reports to law enforcement when a child or youth receiving child welfare services has been identified as a victim of CSE, and immediate reports to the National Center for Missing and Exploited Children (NCMEC) when a child or youth receiving child welfare services is reasonably believed to be at-risk or a victim of CSE, and is missing or has been abducted.

To help counties meet these new requirements, the CDSS released statewide policies and procedures implementing these requirements via [ACL 16-85](#) which instructed counties on the implementation of PL 113-183 and SB 794; requiring social workers and probation officers in all 58 counties to appropriately identify children receiving child welfare services who are at risk or a victim of CSE, document the information in the Child Welfare Services/Case Management System (CWS/CMS), and determine appropriate services for those children. These statewide policies and procedures also require social workers and probation officers to report identified CSEC victims to law enforcement and missing or abducted children/youth receiving child welfare services who are at-risk or victims of CSE to both law enforcement and NCMEC.

The passage of SB 794 necessitated that counties participating in the opt-in CSEC Program incorporate these new requirements into their existing practices and train their staff. While all counties must implement the federal provisions of PL 113-183 and specified administrative activities by all counties may be claimed under Title IV-E federal funding, the SB 855 opt-in program is more extensive, interagency-focused, and provides additional funding for CSEC interventions and services.

The President signed into law the Justice for Victims of Trafficking Act of 2015, [PL 114-22](#) on May 29, 2015. This Act amended the Child Abuse Prevention and Treatment Act to require identification and assessment of all reports involving children known or suspected to be victims of sex trafficking. CDSS created the four CSEC special project codes in CWS/CMS for the purpose of capturing the identification and assessment data. PL 114-22 also required that child welfare services workers be trained in identifying, assessing, and providing comprehensive services to children who are victims of sex trafficking, including efforts to coordinate with relevant agencies. The objective of this law is to ensure a better response for victims of child sex trafficking.

On November 23, 2016, CDSS released [All County Information Notice \(ACIN\) I-83-16](#) providing counties an updated MOU Template, which was completed in collaboration with the CSEC Action Team and required stakeholders. This updated MOU Template combined the opt-in CSEC Program requirements and the federal requirements into one overarching protocol, providing counties with the opportunity to implement a single comprehensive protocol.

Another significant legislative change was the passage of [Assembly Bill 403 \(Chapter 773, Statutes of 2016\)](#), the Continuum of Care Reform (CCR) which was signed into law in October 2015. This comprehensive piece of legislation, which changes foster care placement options, child welfare practice requirements, and emphasizes joint programming with mental health services, while consistent with the practices of CSEC program, requires further integration of implementation strategies at the county level. The CCR will have significant implications for how and where CSEC and at-risk youth are placed and served, and specifically identifies CSEC as a subpopulation requiring particular attention when it comes to the reform.

Additionally and on October 7, 2017, the Human Trafficking Prevention Education and Training Act, ([Assembly Bill 1227 \(Chapter 558, Statutes of 2017\)](#)), was signed into law. This legislation will require that school districts provide instruction to students and training to faculty on sexual abuse and human trafficking. The legislation also requires county offices of education and sheriff's departments to collaborate with existing county partners participating in the CSEC program when establishing the protocols regarding the formation of an interdisciplinary team serving at-risk children.

Appendix B

Data and Reporting Limitations

Table 1: CSEC Type Summary Comparison

Table 1 compares the CSEC Type summary as documented in the CWS/CMS and reported in the County Plans. There are a few measure variables in the data from CWS/CMS and the County Plans. The reporting period for CWS/CMS is between June 1, 2015, and September 30, 2016, which captures data from the inception of the CSEC Program to the most recent available quarter (September 2016). The CSEC Type reported are associated with cases. All CSEC Type in CWS/CMS, with start dates that did not fall between the referral received date and referral disposition date, were assumed to be associated with cases.

The reporting period reflected in the County Plans are a full year from July 1, 2015, through July 1, 2016. The County Plans did not request counties to differentiate the CSEC Type for referrals and cases, so the data displayed from the County Plans are associated with both referrals and cases.

CSEC Type	From CWS/CMS	From County Plans
Victim During Care	260	326
Victim in Open Case, Not in Foster Care	27	58
Victim while Absent from Placement	105	191
Victim in Closed Case, Receiving Independent Living Placement Services	0	0
Victim Before Foster Care	307	476
Total CSEC Victims	699	1,051
At Risk	954	1,400

*The County Plan data does not include the number for the CSEC Type "Victim in Closed Case, Receiving Independent Living Placement Services."

Data Limitations from CWS/CMS

There can be multiple categorical CSEC Types assigned to a single case. During the query process to obtain this data, in order to eliminate reporting duplication of cases, the data points obtained from CWS/CMS were assigned a hierarchy with the following sequential order: (1) Victim During Care, (2) Victim in Open Case, (3) Victim while absent without leave, (4) Victim in Closed Case, Receiving ILP services, (5) Victim Before Care and (6) At risk. The data represented in the table is based on this hierarchy.

In order to obtain accurate CSEC data from CWS/CMS, all participating counties must appropriately document in CWS/CMS. However, only 32 out of the 38 counties that opted-in to

the CSEC Program (not including the three additional counties that opted-in for fiscal year 2016-17) correctly documented CSEC data in CWS/CMS due to challenges including:

- The special project codes (SPCs) in [All County Letter \(ACL\) 15-49](#) were created as an interim to the permanent system changes to CWS/CMS in order to meet the federal documentation requirements per SB 794. The permanent system changes went into effect just last spring, causing confusion and the need for new training to understand when and how to use the CSEC Data Grid and SPC, “S-CSEC Referral.”
- System limitations of CWS/CMS, such as any new changes, take years to implement and are costly. Additionally, certain fields within the CSEC Data Grid are not mandatory, such as the allegation subcategory is not a required field or the start and end date for the CSEC Type. This results in incomplete CSEC data submissions.

There may also be gaps in the data extracted from CWS/CMS. When the SPCs were implemented, there were only four CSEC Types that were available (CSEC victim during foster care, CSEC victim before care, CSEC at risk, CSEC absent from placement), but with the addition of the CSEC Data Grid to CWS/CMS, an additional two CSEC Types were added (CSEC victim in open case not in foster care, CSEC victim with closed case receiving Independent Living Program services). This results in a loss of continuity of the CSEC data measure during the reporting period.

Data Limitations from County Plans

The data quality and accuracy from CWS/CMS cannot yet be assured due to the above-mentioned documentation challenges. Thus, CDSS requested additional data through the County Plans, in order to provide further context to CSEC prevalence.

The data obtained from the County Plans were gathered prior to learning about the documentation challenges and system limitations of CWS/CMS. Additionally, CDSS did not provide instruction in the County Plans to report data using the same hierarchy as mentioned above. Data from the County Plans may have been gathered through unique, county-specific documentation systems without assigned hierarchy.

CWS/CMS and County Plans Comparison

The total number of identified victims and youth at risk for CSE is reported higher in the County Plans than the data extracted from CWS/CMS, even though there is a longer reporting period for the data from CWS/CMS than from the County Plans. The difference in the data suggests that there are documentation inconsistencies in CWS/CMS that will need to be corrected as the modules for the new Case Management System are developed and implemented. The new system will improve data collection as it will include user friendly modules and the accessibility to make immediate changes as needed.

The difference in the data from CWS/CMS and the County Plans also suggests that counties not recording data in CWS/CMS do have a significant number of CSEC victims and youth at risk for CSE that are being tracked through other mechanisms. Further exploration into these discrepancies will be undertaken by CDSS in the coming year.

Although there are substantial differences in the total number of cases reported in CWS/CMS compared to the County Plans, the overall prevalence for each CSEC Type is relatively similar. Both sets of data show that the number of youth identified as at risk for CSE is higher than identified CSEC victims because CDSS has developed an 'at risk of CSE' definition with observable indicators, whereas information related to when the victimization occurred (i.e. before or during foster care, while absent from placement) is largely dependent on self-disclosure. Also, many CSEC do not recognize their victimization, are groomed to withhold information about their relationship with exploiters, and are trauma-bonded to exploiters, which make instances of self-disclosure infrequent. Self-disclosure only comes with trust, which is a complex process that requires dedicated service providers.

Self-disclosure of victimization and re-victimization is also difficult to document because youth who are victims CSE often run away from placement or go missing. Although it is expected that the number of victims who are exploited while absent from placement would also be high, the data suggests otherwise. Victimization during absence from placement would be reported and documented once the youth returns to placement. The low counts of youth exploited while absent from placement suggests there may be a significant number of youth that have not returned to placement to be screened or self-disclose CSE. It is also possible that social workers and probation officers are in the process of learning the new requirements of SB 794, which mandates that youth returning from a runaway or missing episode be screened for CSE. As a result, the accuracy of the counts for the CSEC Type "Victim while Absent from Placement" cannot be assured until youth absent from placement return and are screened per SB 794 requirements.

Data Limitations from County Visits

In addition to the data obtained from CWS/CMS and the County Plans, qualitative data trends were captured during county visits. Many counties report that intake workers are noticing a larger influx of CSEC referrals coming in through the Child Abuse Hotline likely due to education and CSEC trainings and increased awareness resulting from prevention. Although increased referrals are observed at the hotline intake, referral numbers are still likely to be underreported due to reporting and documentation challenges. For example, the reporting and documentation of CSEC relies heavily on disclosure. However, the disclosure of a victim by another can also serve as a barrier, as described above. Some local service providers and social workers shared that a CSEC victim will often disclose the victimization of another youth. However, if the second youth does not self-disclose or deny the allegation, it is difficult to obtain enough information for appropriate reporting or documentation.

Appendix C

Acronyms List

Acronym	Definition
ACL	All County Letter
ACIN	All County Information Notice
CCR	Continuum of Care Reform
CDSS	California Department of Social Services
CSE	Commercial Sexual Exploitation
CSE-IT	Commercial Sexual Exploitation-Identification Tool
CSEC	Commercially Sexually Exploited Children
CWDA	County Welfare Directors Association
CWS/CMS	Child Welfare Services/Case Management System
FY	Fiscal Year
MDT	Multidisciplinary Team
MOU	Memorandum of Understanding
PL	Public Law
SB	Senate Bill
SPC	Special Project Code
WCC	West Coast Children's Clinic