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Systematic Approach to Managing Human Trafficking Risks in Defense Contracting

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MAJ Ammar M. Masoud, U.S. Army—is a Contracting Officer (51C) with 19 years of military service. He began his military career in 2005 as an Enlisted Cryptologic Linguist, later commissioned into the Signal Corps, then served as a Civil Affairs Officer with a focus on the CENTCOM Area of Responsibility (AOR). He transitioned to the Army Acquisition Corps, where he now serves as a Contracting Officer. MAJ Masoud holds a Bachelor of Science degree in Business Administration from California State Polytechnic University, Pomona, and is a Certified Federal Contracts Manager (CFCM), Project Management Professional (PMP), and Certified Contract Management Associate (CCMA). He is currently completing his Master of Science degree in Defense Contract Management at the Naval Postgraduate School, Monterey. His next assignment is with the 925th Contracting Battalion at Fort Drum, NY, supporting the Mission and Installation Contracting Command (MICC) and the 10th Mountain Division (Light Infantry).

Abstract

The Department of Defense (DoD) faces growing scrutiny over its ability to prevent human trafficking, particularly forced labor, in its overseas construction contracts. Despite promoting a zero-tolerance policy and a range of compliance measures, oversight bodies have repeatedly found that the DoD's efforts are fragmented, reactive, and insufficiently risk-informed. This study proposes the integration of the Office of Management and Budget's (OMB) Enterprise Risk Management (ERM) framework, as outlined in Circular A-123, into the DoD's Combating Trafficking in Persons (CTIP) program. Drawing on qualitative analysis of policy documents, federal regulations, oversight reports, and interviews with CTIP experts, this paper maps current CTIP practices against ERM's five core risk management phases: identification, assessment, response, monitoring, and communication. The research reveals significant gaps across the contract life cycle, particularly in pre-award planning and post-award oversight. To address these, the study presents a comprehensive ERM-integrated CTIP framework designed to shift the DoD's approach from reactive enforcement to proactive risk management. Recommendations include implementing trafficking risk screening tools, enhancing contractor vetting, standardizing monitoring practices, and improving interagency data sharing. By embedding ERM principles into CTIP processes, the proposed framework aims to better protect vulnerable laborers, strengthen contractor accountability, and ensure the DoD's contracting practices align with both ethical standards and legal mandates.

Introduction

Human trafficking—particularly forced labor within overseas defense contracts—remains a persistent challenge for the Department of Defense (DoD). The agency relies extensively on contractors for construction and support services in regions with elevated trafficking risks, where subcontractors may exploit vulnerable migrant workers through practices such as confiscating identification documents, charging excessive recruitment fees, or providing substandard living conditions (Morris et al., 2021). These violations undermine U.S. laws and international norms, disrupt mission effectiveness, and erode the DoD's strategic credibility (GAO, 2024).

Since 2002, the DoD has promoted a zero-tolerance policy, first articulated in National Security Presidential Directive 22, which mandates the prevention of trafficking, protection of victims, and accountability for perpetrators (TVPA, 2000). To implement this policy, the Combating Trafficking in Persons (CTIP) Program Management Office (PMO) was established under the Under Secretary of Defense for Personnel & Readiness. Each DoD contract includes FAR clause 52.222-50 prohibiting trafficking-related activities, and larger overseas contracts must include contractor compliance plans (GAO, 2014).

Despite these mandates, oversight bodies have identified critical shortcomings in CTIP implementation. Government Accountability Office (GAO) and DoD Insepctor General (IG)

reports characterize the program as reactive and fragmented, lacking a framework to proactively identify, assess, or monitor trafficking risks across the contracting life cycle (GAO, 2021; GAO, 2024b). Compliance often takes the form of check-the-box actions—standard clauses and basic training—without structured risk analysis or enforcement mechanisms (GAO, 2024).

For example, the GAO found that contracting officials typically rely on self-certifications and standard clauses during procurement planning, with little to no risk-based evaluation. A recent review revealed that over half of applicable contracts failed to include required compliance plans (Morris et al., 2021). In the field, Contracting Officer's Representatives (CORs) frequently reported uncertainty regarding their CTIP oversight duties (GAO, 2021).

The real-world consequences of these gaps are evident. A 2019 DoD IG investigation revealed that a food services subcontractor on a U.S. base in Kuwait had subjected workers to debt bondage and illegal recruitment fees—clear CTIP violations that had gone undetected (DoD IG, 2019). Such incidents may result in contractor debarment, contract termination, reputational harm, and diplomatic fallout (Department of State [DOS], 2024; Morris et al., 2021).

The scope of this problem is magnified by the volume of DoD contracting in high-risk regions. From 2018 to 2020, the DoD awarded approximately $13.1 billion in contracts in countries classified by the State Department as Tier 2 Watch List or Tier 3—jurisdictions with weak labor protections and limited enforcement capacity (DOS, 2024; Morris et al., 2021). In these complex operational environments, traditional compliance mechanisms are insufficient. A more robust, systemic approach is needed to effectively manage trafficking risks (GAO, 2024b).

Research Purpose and Approach

To address these challenges, this study proposes integrating Enterprise Risk Management (ERM) principles, as outlined in Office of Management and Budget (OMB) Circular A-123, into the DoD's CTIP program. ERM offers a structured, organization-wide method to identify, assess, respond to, and monitor risks. Applied to CTIP, ERM can shift the DoD's posture from reactive enforcement to proactive risk management.

This research investigates the central question: How can the DoD systematically embed trafficking risk management into each phase of the contracting life cycle—from planning and solicitation through award and performance? To answer this, the study maps current CTIP practices against ERM's five core phases, identifies operational and oversight gaps, and proposes a comprehensive ERM-integrated framework to strengthen prevention, compliance, and accountability.

The methodology combines qualitative document analysis with expert interviews. Core sources include GAO and DoD IG reports, DoDI 2200.01, FAR/DFARS guidance, and OMB Circular A-123. Insights from CTIP officials and DoD contracting personnel are used to ground the findings in operational reality. The paper proceeds as follows: the Literature Review section presents a focused literature review of anti-trafficking policies and risk management frameworks. The Methodology section outlines the methodology. The Finding and Analysis section presents the research findings and the proposed ERM-integrated CTIP framework. The Conclusions and Recommendations section concludes with key recommendations and discusses the implications of adopting a risk-based approach to combat trafficking in military operations.

Literature Review

Human trafficking—defined as the use of force, fraud, or coercion to exploit individuals for labor or commercial sex—has long posed serious challenges in conflict zones and overseas contracting environments (GAO, 2024). Within the DoD, forced labor risks are most prevalent in

military construction and base operations contracts, which often rely on large numbers of third-country nationals hired through complex subcontracting chains (DoD, 2023). These arrangements can obscure oversight and allow exploitative practices to persist, such as excessive recruitment fees, passport confiscation, and poor living conditions that trap workers in debt bondage (DoD IG, 2019; Morris et al., 2021).

The broader implications of labor trafficking extend beyond human rights violations. As Faruk et al. (2023) estimate, billions of dollars in illicit profits are generated annually through forced labor, particularly in conflict-adjacent regions. For the DoD, these abuses can undermine mission readiness, damage relationships with host nations, and even create local instability near U.S. bases (GAO, 2015; Hoots, 2019). In this context, labor trafficking becomes not just a humanitarian concern but a national security risk (White House, 2021).

To combat trafficking, the U.S. government has developed a comprehensive policy framework centered on the "3P Paradigm"—Prevention, Protection, and Prosecution—as established in the Trafficking Victims Protection Act (TVPA, 2000). A fourth "P," Partnership, was later added to emphasize interagency collaboration (White House, 2021). These principles shape federal anti-trafficking efforts, including those of the DoD. In operational terms, Prevention includes training and contractor vetting; Protection focuses on identifying and assisting victims; Prosecution ensures accountability for violators; and Partnership supports coordination with other agencies and NGOs (DoD, 2020a).

The DoD's CTIP Instruction 2200.01 institutionalizes this framework by mandating training, reporting mechanisms, and enforcement procedures (DoD, 2021a). Executive Order 13627 (2012), along with FAR Subpart 22.17 and DFARS 252.225-7040, further codifies anti-trafficking requirements for federal contractors, including bans on misleading recruitment, passport withholding, and charging recruitment fees (OMB, 2019).

However, the implementation of these policies has not kept pace with their intent. Oversight bodies have repeatedly identified enforcement gaps, inconsistent reporting, and limited monitoring capacity. GAO (2015) flagged insufficient controls over foreign labor use, while a 2021 report found that trafficking incidents were often underreported or poorly tracked across the command chain (GAO, 2024b). The DoD IG (2019) similarly observed that many officials lacked awareness of their monitoring responsibilities and called for improved training, guidance, and data management.

A recurring theme in the literature is the ad hoc and personality-driven nature of CTIP enforcement at the operational level. Morris et al. (2021) noted that implementation often depends on individual initiative—when a contracting officer or commander is engaged, compliance improves; when not, key safeguards may lapse. Additionally, oversight reviews have highlighted underutilization of federal tools such as the Federal Awardee Performance and Integrity Information System (FAPIIS) and the Contractor Performance Assessment Reporting System (CPARS), which could help flag contractors with prior trafficking violations (GAO, 2021). Jurisdictional barriers also complicate enforcement. Status of Forces Agreements (SOFAs) may restrict prosecution of trafficking crimes abroad, and foreign subcontractors can fall outside U.S. legal reach (Hoots, 2019), placing even more responsibility on internal oversight mechanisms.

Critically, despite strong policy mandates, there is no unified risk-based approach to managing trafficking threats in DoD contracting. Existing safeguards emphasize compliance—clauses, checklists, training—rather than proactive risk mitigation. Yet OMB Circular A-123 (2016) now requires federal agencies to implement ERM as part of their internal controls, including operational and compliance-related risks like trafficking. The Chief Financial Officers Council's ERM Playbook (2016) similarly urges agencies to identify cross-cutting risks and embed early-warning indicators into decision-making systems.

While ERM has been applied across DoD functions such as cybersecurity and major systems acquisition, it has not been extended to CTIP (GAO, 2021). As the GAO emphasized in its 2024 report, a systematic approach is urgently needed to address trafficking risks in DoD contracting environments (GAO, 2024b). Currently, the CTIP PMO lacks a risk register guidance, does not conduct recurring risk assessments trainings, and has no performance indicators beyond the required FAR dollar-value threshold that triggers compliance plan requirements (DoD, 2023).

Recent federal guidance reinforces the need for risk-based tools. OMB Memorandum M-20-01 encourages the use of trafficking risk profiles and data analytics to guide compliance oversight (OMB, 2019). The Department of Labor (DoL) has already adopted such approaches, targeting high-risk contracts based on sector and geography (DoL, 2022). International frameworks, including the UN Guiding Principles on Business and Human Rights and OECD's Due Diligence Guidance, also promote continuous risk evaluation within supply chains (OECD, 2018).

The DoD can build on internal precedents as well. Defense acquisition and systems engineering communities routinely use risk management models that incorporate structured assessment, mitigation, and monitoring cycles (Deputy Assistant Secretary of Defense for Systems Engineering, 2017). Applying these same ERM principles—risk identification, assessment, response, monitoring, and communication—to CTIP would help move the Department from reactive enforcement toward a preventative posture (OMB, 2016).

To visualize how federal agencies apply ERM principles, the GAO (2024) outlines a cyclical model that captures the essential components of risk governance. This model illustrates how agencies should align ERM efforts with mission goals, continuously identify and assess risks, determine appropriate responses, and communicate outcomes effectively. Figure 1 provides a visual representation of this ERM cycle and serves as a conceptual foundation for integrating trafficking risk into the DoD's CTIP processes.
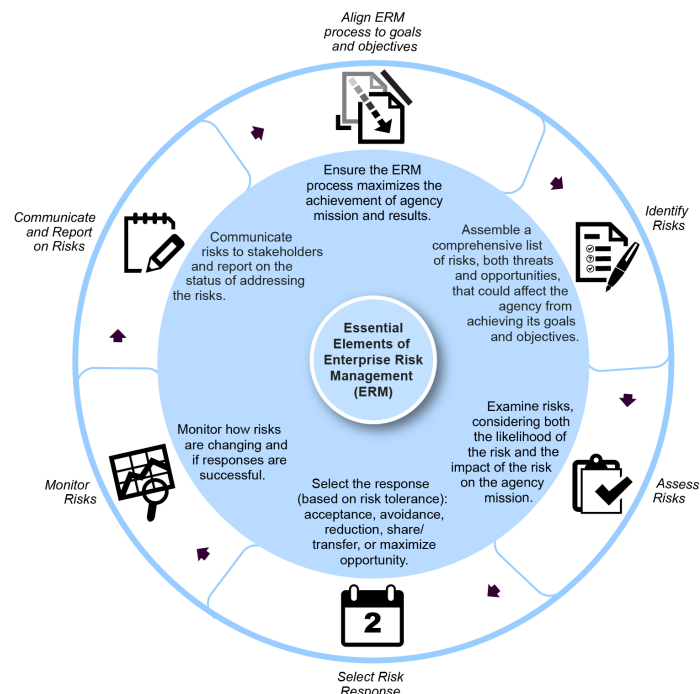
Source: GAO risk management criteria (GAO-17-63); GAO (icons). | GAO-24-106973

Figure 1. Essential Elements of Federal Government Enterprise Risk Management (GAO, 2024)

The literature highlights a persistent gap: the DoD has robust anti-trafficking policies but lacks a formal, enterprise-level framework to implement them consistently. The shift from compliance-oriented enforcement to a proactive, risk-informed model is essential to meet both legal mandates and operational demands (GAO, 2024; Morris et al., 2021). Integrating ERM into the DoD CTIP program would provide the structure needed to anticipate, prevent, and mitigate trafficking risks across the defense contracting life cycle.

Methodology

This study employs a qualitative, exploratory research design to assess the DoD's current CTIP practices and implementation and explore how the DoD CTIP PMO can integrate ERM principles into the CTIP program to develop a risk-informed framework aligned with these principles. The research focuses on mapping current CTIP implementation efforts across the contract life cycle—pre-award, award, and post-award—against the five phases of the ERM framework: risk identification, assessment, response, monitoring, and communication. The research methodology consisted of three components: (1) document analysis, (2) expert interviews, and (3) synthesis into a proposed ERM-integrated CTIP framework. Each component is described below.

Document Analysis

A comprehensive document review was conducted to establish a baseline of the DoD's CTIP practices, identify implementation gaps, and extract risk management insights relevant to the proposed framework. The sources analyzed fell into five major categories:

- **DoD Policies and Guidance:** Core documents included DoDI 2200.01 (2020), the DoD CTIP Strategic Plan (2014–2018), internal CTIP training materials, onboarding guides, and task force charters. These sources clarified formal roles, responsibilities, and mandated CTIP processes.

- **Acquisition Regulations:** Federal Acquisition Regulation (FAR) Subpart 22.17 and the Defense FAR Supplement (DFARS 252.225-7040) were reviewed to capture contractual requirements, including compliance plan thresholds and definitions of prohibited practices. Policy memoranda from the Defense Procurement and Acquisition Policy (DPAP) office were also included.

- **Oversight Reports:** GAO reports (2012, 2015, 2021, and 2024), DoD IG findings (e.g., DODIG-2019-088), and U.S. Central Command assessments were content-analyzed to surface recurring problems such as weak field monitoring, inconsistent reporting, and limited data tracking. These evaluations provided critical input into systemic gaps and prior recommendations.

- **Academic and Practitioner Research:** Studies by Hoots (2019), Grush (2016), Brown (2019), and Morris et al. (2021) were reviewed to incorporate external critiques and alternative conceptual frameworks addressing trafficking in military or government contracting contexts.

- **Risk Management Frameworks:** Federal guidance including OMB Circular A-123 (2016), the CFO Council ERM Playbook (2016), and OMB M-20-01 (2019) were analyzed to identify standard risk definitions, institutional best practices, and ERM application in analogous domains. The DoL's ERM Framework 3.0 was reviewed as a model for operationalizing ERM in compliance-sensitive environments.

Each document was systematically reviewed for references to ERM's five phases—risk identification, assessment, response, monitoring, and communication—and cross-coded by contract life cycle stage (pre-award, award, post-award). This dual-coding process enabled structured mapping of CTIP activities against ERM principles, highlighting phase-specific and life cycle–specific gaps. For instance, no policy documents mentioned trafficking risk assessments during acquisition planning, confirming a systemic pre-award blind spot.

Expert Interviews

To supplement the document analysis with operational insights, semi-structured interviews were conducted with subject matter experts, including DoD contracting officers, CTIP PMO staff, Defense Acquisition University (DAU) contingency contracting experts, and policy/compliance specialists. Interviews lasted approximately one hour each and were guided by a flexible questionnaire focusing on current CTIP processes, enforcement challenges, oversight practices, operational implementation gaps, and opportunities for risk-based integration.

Interviewees were selected for their subject-matter expertise and operational experience with CTIP in various geographic and functional contexts in coordination and collaboration with the DoD CTIP PMO Director. Each interview explored the following themes for a comprehensive understanding of both institutional practices and frontline challenges:

- How CTIP responsibilities are integrated (or neglected) in different phases of contracting

- Challenges in enforcing CTIP clauses and vetting contractors at the operational and tactical levels

- Suggestions for strengthening oversight or implementing risk-based practices

- Reactions to draft components of the proposed ERM-integrated framework

- CTIP experts recommendations to enhance the CTIP PMO contributions to the fight against forced labor in defense contracting

Open-ended questions encouraged real-world examples. One contracting officer observed, "Our process only kicks in after something goes wrong," highlighting the reactive nature of existing CTIP enforcement in a deployed contingency environment. Interviewees were assured anonymity and confidentiality to promote honest reflection on internal shortcomings.

All interviews were analyzed using qualitative content analysis to extract themes, corroborate gaps identified in documents, and surface practical solutions. For example, the GAO's finding that CORs were often unaware of CTIP duties was confirmed through interviews citing inadequate training and the lack of role clarity. However, a DAU professor interviewed asserted that new CORs' guidelines and trainings were updated to reflect CTIP measures on ground; nevertheless, further training and awareness are still required for CTIP implementation effectiveness by the CORs.

Data triangulation across policy documents and practitioner insights was used to validate findings and enhance reliability. The study adopts a case-study approach to contextualize risks and practices within real-world contracting environments, particularly in Tier 2 and Tier 3 countries as classified by the State Department's Trafficking in Persons Report. The integration of document analysis and expert interviews allows for a multidimensional view of current practices and the feasibility of embedding ERM into CTIP program management.

Framework Synthesis and Validation

Findings from the document review and expert interviews were synthesized to develop a proposed ERM-integrated CTIP framework. A gap analysis matrix was constructed, aligning ERM's five phases with the three key contract life cycle stages. Each cell was coded to indicate the presence (✓) or absence (✗) of relevant CTIP practices, producing a structured visualization of systemic gaps (see Table 1 in Findings and Analysis).

The framework design was refined iteratively. Suggestions from interviewees and NPS advisors and insights from ERM best practices were incorporated to propose targeted improvements—such as risk screening tools in pre-award planning and CTIP monitoring plans in Quality Assurance Surveillance Plans (QASPs). Draft framework elements were informally validated with two experts (a CTIP PMO official and NPS Advisors), who confirmed feasibility and recommended minor clarifications.

Ethical Considerations and Limitations

All sources used were either publicly available or provided with consent. Interviewees participated voluntarily, gave informed consent, and retained the right to withdraw. No personally identifiable data or victim-specific information was collected, minimizing risk to human subjects. Confidentiality was maintained in all reporting.

The study's limitations reflect its qualitative scope. Findings depend on participant perspectives and document availability. It is possible that emerging CTIP initiatives within the DoD were not captured. While the proposed framework is grounded in best practices, it remains conceptual and untested in operational settings. These limitations are acknowledged, but they do not undermine the core insight: that a structured, risk-based approach to CTIP practices and implementation is both necessary and currently lacking in DoD contracting in overseas contingency operations and forward base support.

Findings and Analysis

This section presents the study's key findings, drawn from document review and practitioner interviews, and analyzes how the DoD's current CTIP practices align with ERM principles. It begins by diagnosing the limitations of the existing CTIP process and then maps critical gaps across the contract life cycle. These findings serve as the foundation for the ERM-integrated framework proposed in the following section.

Current DoD CTIP Process and Limitations

The DoD existing process for addressing trafficking in persons (TIP) in its contracts is largely structured around reactive compliance-centered enforcement. This process delineates how TIP allegations involving defense contracts are reported and resolved, distinguishing among incidents involving Service members, DoD civilians, or contractors. When a TIP allegation arises—such as forced labor or recruitment abuse—it is typically reported through channels such as an IG hotline or the chain of command. Upon notification, the matter is referred to investigative authorities (e.g., the DoD IG or Defense Criminal Investigative Organizations), and the contracting officer is notified in accordance with FAR 52.222-50. From there, a series of accountability actions may unfold, including contract remedies (e.g., stop work orders or terminations), referrals to Suspension and Debarment Officials (SDOs), and, when applicable, criminal prosecution. This system reinforces the Department's zero-tolerance policy by imposing punitive measures when violations are substantiated.

This process is visually summarized in the Department's CTIP Case Process Flow (Figure 2), which outlines the referral and adjudication pathways for TIP incidents involving contractors, civilians, or service members, including administrative, criminal, and contractual
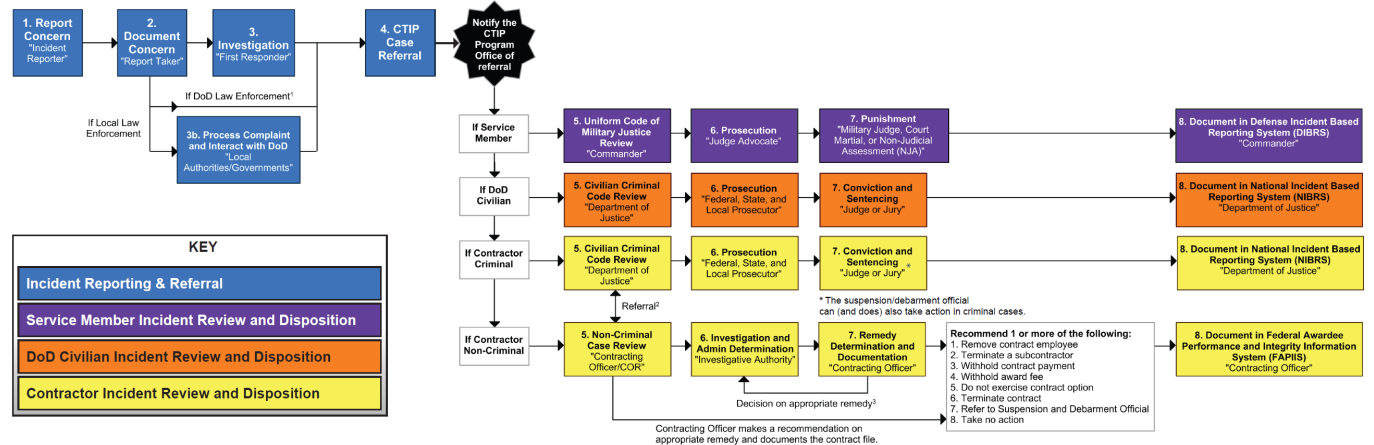
remedies.

Figure 2: DoD CTIP Case Process Flow

While this process provides a clear mechanism for response, it suffers from critical limitations when evaluated through a risk management lens. Most notably, the DoD's current CTIP enforcement posture is fundamentally reactive. As one CTIP expert noted, "our process kicks in only after a problem is evident, not necessarily to prevent one" (Interview, 2024). This observation aligns with GAO findings that the Department focuses on post-violation enforcement, rather than proactively identifying and mitigating TIP risks throughout the contract life cycle (GAO, 2024).

Document analysis and practitioner interviews identified several specific shortcomings:

- **Undefined Preventive Roles and Oversight Responsibilities:** CORs are not consistently trained or tasked with CTIP monitoring. GAO (2021) reported that many CORs lacked awareness of their TIP oversight duties, a finding confirmed in interviews. A DAU professor acknowledged that CORs "lacked specific guidance on what to check or monitor regarding trafficking compliance" (Interview, 2024). The absence of explicit responsibilities and tools contributes to inconsistent field-level oversight that undermines prevention.

- **Fragmented Reporting and Data Capture:** Although multiple reporting mechanisms exist (e.g., IG hotline, chain of command, local law enforcement), they are not centrally coordinated. A 2021 GAO review noted that TIP incidents were often incompletely reported or not captured in a unified system, limiting visibility for senior leadership and precluding trend analysis. Moreover, prior contractor violations are not systematically shared across Components or contracting offices, meaning officials may award new contracts without knowledge of past TIP infractions (GAO, 2021).

- **Limited Integration of Risk Management:** The current CTIP process lacks formal mechanisms for trafficking risk identification, assessment, or prioritization at any stage of the contract life cycle. There is no structured protocol to flag high-risk contracts based on geography, sector, labor demographics, or subcontracting complexity. As one contracting officer explained, "we don't have a tool that says 'this contract has a high risk of labor trafficking' apart from the dollar threshold," highlighting the absence of early-stage risk profiling (Interview, 2024).

- **Lack of Strategic Visibility at the CTIP PMO Level:** Although the CTIP Case Process Flow instructs DoD Components to notify the CTIP PMO of trafficking referrals, this step is inconsistently executed in practice. One CTIP expert noted that "Components fail to notify the PMO when contractor-related TIP incidents occur, even when substantiated," resulting in the PMO being unaware of field-level incidents that have significant strategic implications (Interview, 2025). This breakdown hampers centralized tracking, inhibits strategic oversight, and reduces the Department's ability to identify patterns, direct resources, or report comprehensively on TIP risk trends.

Collectively, these findings reveal that while the DoD's CTIP system is capable of enforcing penalties after violations, it does not operate as a preventive risk management function. The existing framework lacks integration of TIP risk considerations into contract planning, source selection, and performance monitoring—functions that should align with the principles of ERM under OMB Circular A-123. Without a proactive, systemic approach, the Department remains vulnerable to preventable harm, missed contractors and subcontractors' patterns, and reputational damage.

Analysis of the ERM Phases in the Contract Life Cycle

Drawing on GAO reports, DoD policy documents, and practitioner interviews, this analysis examined the DoD's CTIP implementation through the lens of the ERM cycle (per OMB Circular A-123) to identify how a more proactive, risk-informed approach can strengthen the program. ERM provides an ideal analytical lens for examining CTIP implementation because it offers a systematic approach to identifying, assessing, and managing risks across an organization—precisely what the GAO has identified as lacking in current anti-trafficking efforts. Using the five ERM phases—identification, assessment, response, monitoring, and communication—each stage of the contracting life cycle (pre-award, award, and post-award) was examined for current strengths and gaps.

Risk Identification

The DoD includes standard anti-trafficking clauses (FAR 52.222-50) in relevant contracts and requires compliance plans for overseas contracts over $500,000. However, contracting officials lack tools to assess TIP risk systematically during planning. No formal risk profiling—based on country risk tiers, industry sectors, or contractor history—is conducted. Systems like FAPIIS and CPARS, which track past contractor misconduct, are underutilized for TIP-specific red flags (GAO, 2021; OMB, 2020). Interviewees confirmed that trafficking concerns are rarely discussed in pre-award meetings unless tied to prior incidents. This absence of structured identification limits the ability to prioritize resources and tailor oversight to high-risk contracts.

Risk Assessment

The DoD does not currently assign trafficking risk levels (e.g., low/medium/high) to contracts or regions. Anti-trafficking requirements are implemented uniformly, regardless of contract risk profiles. Offeror compliance plans are often reviewed for presence, not quality, and performance history regarding TIP is seldom evaluated beyond existing suspensions or debarments. Interviews revealed that source selection boards treat CTIP considerations as pass/fail items rather than factors in best-value assessments. Moreover, post-award assessments are informal and reactive, triggered only by complaints or investigations (GAO, 2024b).

Risk Response

DoD has a robust policy toolkit on paper, including contract remedies, debarment procedures, and compliance plan requirements (DoD, 2019; FAR Subpart 22.17). However,

enforcement is inconsistently applied. While some commands actively use post-award conferences to reinforce CTIP responsibilities and distribute awareness materials (CTIP PMO, 2021), others overlook these steps. CORs often lack the training or explicit mandates to oversee CTIP compliance, despite the existence of updated guidance and checklists in the 2022 "Contracting Officer's Representatives Guidebook" that could facilitate such oversight. Although tools like the Army's CTIP Job Aid and checklists exist, they are not standardized across the DoD. Consequently, violations may go unaddressed or unreported unless prompted by an external trigger or leadership attention (GAO, 2021).

Risk Monitoring

Continuous monitoring mechanisms for CTIP are weak. Most CORs do not conduct proactive checks for trafficking indicators, and routine surveillance plans rarely include CTIP-specific tasks. While annual certifications from contractors are required, the implementation of compliance plans is not actively verified. At the program level, monitoring is fragmented—TIP data is inconsistently reported across DoD components and databases. The GAO has noted lapses in incident tracking, training statistics, and data fusion, all of which hinder effective monitoring and trend analysis (GAO, 2021; DoD IG, 2019).

Risk Communication

Internal and external communication of trafficking risks remains siloed. Field-level observations often fail to escalate to leadership due to unclear reporting roles and cultural hesitations. Information on prior violations is not systematically shared across commands or incorporated into future contract planning. Communication between contracting offices, the CTIP PMO, legal advisors, and SDOs is inconsistent, leading to missed opportunities for early intervention. Externally, the DoD contributes to interagency reports (e.g., for the Trafficking in Persons Report) but lacks transparent, public-facing disclosures on CTIP enforcement outcomes (GAO, 2024; White House, 2021).

Systematic Assessment of CTIP Implementation Across the Contract Life Cycle

The above analysis of each ERM phase can be further synthesized by systematically mapping strengths and gaps across the contract life cycle stages. Table 1 provides a comprehensive visualization of this assessment, identifying where the DoD has implemented effective measures (indicated by ✓) and where significant deficiencies remain (indicated by ✕). This systematic mapping reveals patterns across both ERM phases and contract stages, highlighting structural weaknesses in the current approach to trafficking risk management.

Table 1: Mapping of ERM Phases Across DoD Contract Life Cycle Stages—Current State Assessment

ERM Phase | Contract Stage	Pre-Award (Planning & Solicitation)	Award (Contract Finalization)	Post-Award (Performance & Close-Out)
Risk Identification	✓ Standard TIP clauses included in all relevant solicitations and contracts. ✗ No formal risk profiling of contracts for TIP vulnerabilities. ✗ Inconsistent use of past performance data (FAPIIS/CPARS) to flag prior TIP issues.	✗ Limited new identification essentially assumes risks identified during pre-award carryover. ✗ No requirement to re-check for emerging risk factors at the time of award.	✗ Reliance on ad-hoc incident reporting; no continuous surveillance plan in most contracts. ✗ Lack of field assessments to proactively detect trafficking indicators.
Risk Assessment	✗ No CTIP risk level assigned to acquisitions. ✗ CTIP plan evaluation is pass/fail, not a graded risk factor in source selection.	✗ Contractor selection does not explicitly weigh TIP risk aside from basic responsibility checks. ✓ Contractors with known severe violations are likely excluded via suspension/debarment.	✗ No routine reassessment of trafficking risk as the contract evolves. ✗ Incomplete data on incidents leads to an underestimation of risk.
Risk Response (Mitigation)	✓ Anti-trafficking clause and compliance plan requirements embedded in contracts. ✗ Quality control of compliance plans is weak. ✗ No enhanced requirements for high-risk contracts beyond the standard clause (one-size-fits-all).	✓ Post-award conferences sometimes reinforce CTIP requirements and distribute awareness materials (if done). ✓ Assignment of trained CORs and inclusion of CTIP in their duties. ✗ Not consistently executed—CTIP is often not emphasized during contract kickoff.	✓ Strong enforcement tools are available: contract termination, withhold payments, personnel removal, and S&D referrals. ✓ Some use of remedies has occurred. ✗ Monitoring-based mitigation is weak—if issues aren't detected, responses can't activate. ✗ S&D seldom used as a deterrent (few referrals), potentially limiting accountability.
Risk Monitoring	✗ No explicit CTIP monitoring plan in acquisition strategy; relies on later oversight.	✗ Minimize the time during the award, aside from ensuring documents are in order.	✓ Some contracts/commands implement TIP checks as part of QA surveillance. ✗ COR oversight of CTIP compliance is often lacking due to unclear guidance. ✗ Program-level monitoring is incomplete: not all incidents are tracked in databases, and training metrics are not fully reported.
Risk Communication	✓ FAR clause and RFPs communicate expectations to bidders.	✓ Award documents and kick-off meetings (if utilized), communicate	✓ Established reporting channels (IG hotline, chain of command) for incidents.

		roles. ✕ Informal communication depends on individual CO emphasis; no standard CTIP briefing requirement exists.	✕ Gaps in upward communication: Some violations are not reported or entered into systems. ✕ Lateral communication gaps: S&D officials and others are unaware of ongoing cases. ✕ Limited external transparency on CTIP issues in contracts.
	✕ No mechanism to communicate assessed risk level to approving officials—leadership not specifically briefed on TIP risk for acquisitions.		

Synthesis: Need for an ERM-Integrated Framework

These findings culminate in a diagnostic table (presented in the full document) that maps current CTIP implementation across ERM phases and contract stages. It reveals strengths in enforcement tools and baseline compliance measures but highlights significant gaps in proactive risk detection, differentiated oversight, continuous surveillance, and organizational learning. As OMB Circular A-123 and Memorandum M-20-01 emphasize, enterprise risks—including those involving labor trafficking—require structured, life cycle–based management. The data strongly support the need for an ERM-integrated CTIP framework that embeds trafficking risk management throughout the contracting process. The following section presents a proposed ERM-integrated framework that addresses these gaps by embedding proactive risk management practices throughout the contract life cycle, from planning and solicitation through performance and closeout.

Proposed ERM-Integrated CTIP Framework

Building on the diagnostic findings outlined in the preceding analysis, this section proposes a comprehensive framework to embed ERM principles into the DoD's CTIP program. The proposed approach transforms CTIP from a reactive, compliance-centered posture to a proactive, risk-informed system that anticipates, mitigates, and responds to trafficking risks across the contract life cycle.

This framework aligns with the five core phases of the ERM cycle—risk identification, assessment, response, monitoring, and communication—and maps these into each phase of the contracting process: pre-award, award, and post-award. In doing so, it institutionalizes CTIP risk management as an embedded part of procurement governance, consistent with the intent of OMB Circular A-123 and OMB Memorandum M-20-01.

Pre-Award Risk Screening and Profiling

Prior to solicitation, all contracts in identified high-risk categories (e.g., those involving manual labor or performance in high TIP Tier countries) should undergo a formal Trafficking Risk Assessment. This process would be supported by a standardized tool or policy guidance developed by the CTIP PMO experts in collaboration with acquisition professionals such as the Defense Pricing, Contracting, and Acquisition Policy/Contract Policy (DPCAP/CP) office Army Contracting Command and Contracting Support Brigades (CSBs) in different Combatant Commands, such as CENTCOM and the 408th CSB. The tool, policy or guidance would draw on:

- State Department TIP Tier rankings

- Labor Department ERM best practices

- Sector-specific vulnerabilities (e.g., construction, base services, and later food services)

- Anticipated workforce composition (e.g., use of third-country nationals, local expats, etc.)

- Contractor past performance (using data from FPDS, FAPIIS, and CPARS)

- Enhanced vetting of contractors with previous trafficking violations

- Contract value, duration, and geographic complexity

Based on these inputs, contracts would be assigned a risk level (Low, Medium, High), and this designation would be documented in acquisition planning documents and a centralized CTIP Risk Register. Risk levels would directly influence solicitation design, oversight planning, and contractor expectations. This pre-award shift from uniform compliance to tailored risk stratification represents a critical advancement over the current checklist model.

Enhanced Risk-Based Solicitation and Source Selection

Building on the risk rating, the framework calls for differentiated CTIP safeguards in solicitation and award processes. For High-risk contracts, RFPs should require enhanced compliance plans that include:

- Third-party audits of recruitment agencies

- Verification of wage and housing conditions

- On-site compliance officers

- Disclosure of supply chain actors (e.g., labor brokers or subcontractors)

- Participation in certified ethical recruitment programs

Additionally, evaluation criteria should assign scoring weight to the quality of anti-trafficking measures and past CTIP performance, moving beyond the binary "compliant/non-compliant" approach. The source selection process would thus incorporate CTIP as a discriminating factor, rewarding contractors who demonstrate substantive commitment to worker protection. In extreme cases, the government may consider risk avoidance strategies, such as in-sourcing certain services or disaggregating large contracts to reduce oversight burden.

Enterprise Risk Register and Strategic Governance

At the enterprise level, the CTIP PMO would maintain a DoD-wide CTIP Risk Register—a dynamic repository that tracks risk levels, incidents, and compliance trends across contracts. All medium and high-risk contracts would be logged in this dashboard, along with real-time updates on violations, investigations, and remedial actions.

This register would be reviewed quarterly by a CTIP Risk Governance Council, comprising members from the CTIP PMO, IG offices, and senior contracting and legal officials. This forum would enable enterprise-level oversight, trend identification, and strategic resource allocation—facilitating cross-Component learning and prevention.

Role Definition and Specialized Training

To operationalize oversight at the contract level, the framework emphasizes role clarity and capacity-building. COR appointment letters for high-risk contracts would explicitly assign and enforce CTIP monitoring responsibilities as outlined in the 2022 "Contracting Officer's Representatives Guidebook" Appendix D.7 (CTIP Checklist). In parallel, a tiered training curriculum would be introduced in collaboration with DAU:

- Basic CTIP awareness for all contracting personnel

- Advanced modules for officials managing Medium/High-risk contracts

- Scenario-based training on identifying trafficking indicators, recordkeeping, and escalation procedures

The creation of CTIP liaisons at major installations with frequent high-risk contracts would further institutionalize these responsibilities, bridging gaps between the operational and strategic levels.

Continuous Monitoring Plans

For each Medium or High-risk contract, the contracting team would prepare a CTIP Monitoring Plan as part of the Quality Assurance Surveillance Plan (QASP). These plans would include:

- Scheduled site visits (including unannounced inspections)

- Confidential worker interviews in native languages

- Verification of legal recruitment conditions (e.g., no fees, possession of passports)

- Monitoring indicators and defined escalation protocols

These activities would be formally logged, and key metrics—such as the number of worker interviews conducted or non-compliance triggers—would be reported monthly to the CTIP PMO for tracking and metrics compilation. This approach transitions CTIP oversight from ad-hoc responsiveness to deliberate, data-informed vigilance to support the CSBs in countries.

Standardized Incident Response Protocol

In the event of a suspected violation, the framework mandates a coordinated incident response workflow led by a multi-agency CTIP Incident Team. This team—comprised of contracting, investigative, legal, and victim support personnel—would ensure synchronized enforcement and reporting. Responsibilities include:

- Immediate evaluation of contractual remedies (e.g., stop-work order)

- Notification of the SDO

- Activation of victim support protocols (housing, repatriation)

- Logging actions and outcomes in the CTIP Risk Register

By introducing a case manager to oversee the incident life cycle, the process ensures timely updates to leadership and helps close the gap between field-level detection and enterprise learning.

Metrics and Performance Tracking

To institutionalize accountability, the framework introduces Key Performance Indicators aligned with CTIP risk management outcomes. Sample metrics include:

- % of High-risk contracts with CTIP monitoring plans

- Ratio of incidents detected proactively vs. reported externally

- Average response time from incident notification to remedy

- Completion rates for CTIP training among CORs on high-risk contracts

Quarterly dashboard reviews would be led by the CTIP Task Force, with results informing program adjustments and oversight briefings to leadership. This datacentric approach supports both internal accountability and external transparency.

Interagency and Industry Collaboration

Recognizing that TIP risk in government contracting transcends the DoD alone, the framework promotes external engagement through:

- Active participation in the OMB-led Procurement & TIP Task Force

- Annual industry CTIP roundtables to align expectations and share best practices

- Data-sharing partnerships with agencies like USAID and State Department on common vendors and country risks

This collaborative stance positions the DoD not only as a policy implementer, but as a leader in anti-trafficking innovation across the federal landscape.

Illustrative Scenario

To visualize the ERM-CTIP implementation, let's consider a $200 million base support contract in Southeast Asia. Pre-award risk screening flags the procurement as "High risk." The RFP mandates a robust CTIP plan, and past violations influence source selection. Upon award, the COR receives CTIP-specific oversight responsibilities, and a monitoring plan includes quarterly site visits and monthly worker interviews. When concerns emerge, the Incident Team responds swiftly—triggering contract remedies, updating the risk register, and briefing senior officials. Later, trend analysis across contracts reveals patterns tied to a problematic subcontractor, prompting preemptive scrutiny on future awards.

Expected Gains from Implementation

The integration of ERM principles into the DoD's CTIP program is not merely a procedural shift—it represents a fundamental transformation in how trafficking risks are understood, addressed, and governed. This section outlines the practical benefits that implementation of the proposed framework is expected to yield. Drawing from both the diagnostic findings and best practices in federal risk management, these anticipated gains span from early prevention and stronger oversight to improved coordination and long-term institutional resilience.

- **Proactive Prevention:** Upfront risk profiling and enhanced requirements stop many violations before they occur, shifting the program from incident response to risk anticipation.

- **Visibility and Accountability:** CTIP performance becomes trackable, auditable, and visible to leadership—closing gaps in oversight and strengthening institutional responsibility.

- **Improved Detection and Timely Response:** Proactive site-level monitoring, standardized incident protocols, and well-trained personnel result in earlier detection, swifter remedies, and stronger deterrents.

- **Contractor Incentives and Culture Change:** Contractors understand that the DoD prioritizes CTIP. Competitive pressures and transparent evaluation criteria encourage long-term investment in ethical labor practices.

- **Alignment with Federal Risk Governance:** By integrating TIP as a strategic risk, the framework supports OMB A-123 compliance, responds to GAO recommendations, and models interagency best practices.

- **Mission Resilience and Operational Continuity:** Preventing labor

exploitation minimizes performance disruptions and reinforces ethical and operational credibility of U.S. defense missions abroad.

Implementation Considerations

Transitioning to this model will require resourcing and cultural shift. Challenges may include increased training demands, contractor pushback, and the need to pilot tools (e.g., risk assessment checklists) before full-scale deployment. However, the strategic and ethical benefits outweigh the transitional costs. Importantly, this framework is designed to evolve—integrating seamlessly with the DoD's digital modernization. Risk registers can be embedded into existing procurement systems, and data analytics (e.g., anomaly detection via AI) can strengthen future risk identification.

Applying ERM to CTIP is not only viable—it is urgently necessary. This framework offers a structured path to embed anti-trafficking oversight at every level of the defense acquisition system. Through risk-driven prevention, enhanced contractor accountability, and interagency collaboration, the DoD can fulfill its zero-tolerance policy with integrity, foresight, and leadership.

Conclusions and Recommendations

This study set out to determine how the DoD can systematically address human trafficking risks within its contracting processes. Through a comprehensive analysis of current practices and the application of the OMB Circular A-123 ERM framework, it has become evident that integrating risk management into the DoD's CTIP program is both a critical need and a viable path forward. While the DoD has established anti-trafficking policies, significant gaps remain in execution, leaving vulnerable workers at risk and the Department exposed to unethical and unlawful practices in its supply chain. By adopting an ERM-integrated CTIP framework, the DoD can transition from a reactive stance to a proactive posture, embedding trafficking risk considerations into everyday contracting activities.

Key Recommendations for the DoD's CTIP Program

To operationalize the ERM-integrated CTIP framework, this section outlines a set of targeted, actionable recommendations aimed at institutionalizing trafficking risk management across the Department's acquisition life cycle. These recommendations are grounded in the findings of this study and aligned with federal risk management guidance. Together, they provide a roadmap for transforming CTIP from a compliance obligation into a strategic function that safeguards both mission integrity and human rights.

1. **Integrate ERM into CTIP Policy and Guidance:** The DoD should formally incorporate ERM principles into its CTIP directives and related acquisition policies. This includes updating DoD Instruction 2200.01 (CTIP) and the DFARS to mandate risk-based approaches, such as requiring risk assessments for contracts in designated high-risk categories and maintaining a CTIP risk register that feeds into ERM reporting. The CTIP PMO should develop implementation guidance for field offices on conducting risk profiling and developing monitoring plans, aligned with the OMB ERM framework.

2. **Pilot the Framework in High-Risk Environments:** Initiate a pilot program applying the ERM-integrated CTIP framework in high-risk settings, such as contracts within the U.S. Central Command (CENTCOM) Area of Responsibility (AOR) involving large overseas service contracts. This pilot would implement all elements of the framework on select contracts over a 1–2 year period, allowing for refinement based on real-world feedback and demonstrating proof of concept. Leadership support is crucial, potentially through a policy memo from the Office of the Under Secretary of Defense for

Personnel and Readiness or Acquisition and Sustainment.

3. **Strengthen Contract Requirements and Clauses:** Enhance anti-trafficking provisions in the FAR/DFARS to enable a risk-based application. Introduce clauses requiring additional safeguards for high-risk contracts, such as detailed compliance plans, independent audits, and annual CTIP compliance reporting from contractors. Mandate that prime contractors flow down CTIP monitoring obligations to subcontractors, ensuring active oversight beyond current requirements. Update source selection procedures to allow evaluation credit for superior CTIP practices, providing regulatory clarity.

4. **Implement a CTIP Risk Dashboard for Decision-Makers:** Develop a unified CTIP risk dashboard accessible to key decision-makers, displaying metrics such as the number of high-risk contracts by command, status of monitoring plans, and incidents reported and resolved. Integrate this dashboard into existing contracting data systems, like the Procurement Business Intelligence Service, or as an extension of the DoD's internal human trafficking case management system. This visualization operationalizes the risk register concept, keeping leadership attention on the issue.

5. **Enhance Training and Resources for Oversight Personnel:** Invest in specialized training for contracting officers, CORs, and contract administrators involved in medium to high-risk contracts. Training should cover identifying trafficking red flags, interviewing workers, documenting and reporting findings, and leverage case studies from past incidents. Provide practical tools, such as CTIP Monitoring checklist templates, guides for evaluating compliance plans, and a library of best practice compliance plan examples. Ensure support for oversight personnel, including access to CTIP experts and language support for worker interviews.

6. **Improve Interagency Coordination and Share Data:** Formalize information-sharing protocols with other agencies, particularly the Department of State's TIP office and the DoL. Share information on recruitment agencies involved in abusive practices to inform watchlists and vice versa. Propose regular interagency meetings focused on trafficking in federal contracting, ensuring lessons learned inform broader strategies. Engage with host nation authorities through embassies to strengthen enforcement, coordinating on inspections of labor camps.

7. **Continuously Refine the Framework with Data Analytics and Feedback:** Treat the CTIP risk management framework as a living program, evolving through data analysis and field feedback. Analyze collected data to identify effective strategies and areas needing improvement. Incorporate modern data analytics or AI to enhance early-warning capabilities, such as mining contract performance reports or using network analysis to identify problematic subcontractors. Establish channels for field personnel to suggest improvements or report obstacles and conduct formal reviews after full implementation to make necessary adjustments.

Implications for the DoD CTIP PMO

Adopting the proposed framework will transform the CTIP PMO from a policy and training overseer into a dynamic risk management coordinator. This transition requires developing new capabilities in data analysis and program management, potentially staffing with

personnel experienced in risk management, auditing, data analytics and compliance. The PMO would manage the CTIP risk register/dashboard and become the focal point for reporting CTIP risk status to DoD leadership. Strengthening collaboration with contracting policy offices, the DoD IG, and Combatant Command representatives is essential, possibly through establishing a dedicated ERM integration working group. By proactively managing risks, the CTIP PMO will enhance the DoD's ability to prevent issues, efficiently allocate resources, and respond effectively to incidents.

Broader Significance and Future Outlook

Implementing the ERM-integrated CTIP framework extends beyond improving contract oversight; it reinforces the DoD's commitment to human rights and mission effectiveness. By eradicating forced labor from its overseas contracts and supply chain, the DoD upholds U.S. values, protects workers supporting military missions, and strengthens the moral legitimacy of U.S. operations. This initiative can serve as a model for integrating ERM into other cross-cutting issues, such as vendor integrity, contract fraud, and human rights due diligence in global contracting. Future research should explore adapting the framework to manufacturing supply chains, leveraging supply chain transparency technologies, developing quantitative methods to measure risk reduction, comparing interagency frameworks, and conducting cost-benefit analyses to justify investments in anti-trafficking measures.

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