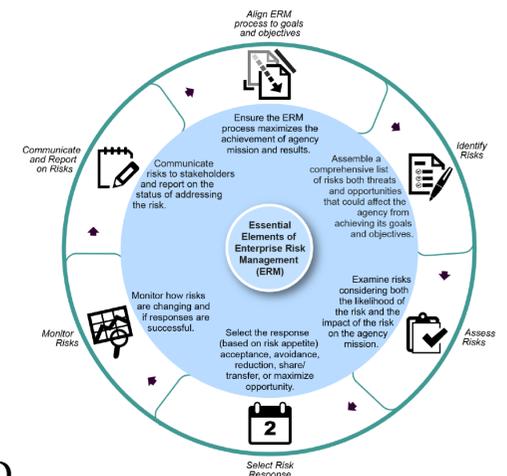


Abstract

Human trafficking—especially forced labor—represents both a national security and ethical challenge in DoD's overseas construction contracts. Despite the USG zero-tolerance policy, enforcement is fragmented and reactive. This research proposes aligning the Combating Trafficking in Persons (CTIP) program with the Enterprise Risk Management (ERM) Framework (OMB Circular A-123). By mapping CTIP processes to the ERM phases, the study introduces a structured model to identify, assess, and mitigate trafficking risks. Deliverables include an ERM-integrated framework, a centralized risk dashboard, and targeted policy recommendations for high-risk environments like Kuwait—shifting DoD from reactive enforcement to proactive risk management.



OMB ERM Framework – Risk Management Process

Methods

- **Qualitative research design** with document analysis and expert interviews
- **Document analysis** of GAO reports, DOD policies, FAR/DFARS regulations, and CTIP PMO documentation
- **Expert interviews** with CTIP specialists, contracting officers, and acquisition professionals
- **Process mapping** of current CTIP practices against OMB ERM framework components
- **Gap analysis** identifying deficiencies across contract lifecycle phases
- **Case study focus** on USCENTCOM construction contracts, particularly Kuwait operations

Results & Impact

- **Current approach is reactive** - DOD responds to incidents after they occur rather than preventing them proactively
- **Systematic gaps identified** across all five ERM phases: risk identification, assessment, response, monitoring, and communication
- **Fragmented oversight** - 75% of reviewed contracts failed to meet anti-trafficking requirements due to inconsistent implementation
- **Proposed ERM framework** provides structured approach to embed trafficking prevention throughout contract lifecycle
- **Enhanced accountability** through enterprise CTIP risk register and standardized monitoring protocols
- **Operational impact** - Framework enables early risk detection, targeted resource allocation, and strengthened contractor compliance in high-risk overseas environments



DoD Contract Lifecycle: Where Trafficking Risks Emerge
Trafficking risks can emerge at every contract lifecycle phase—from inadequate pre-award screening to insufficient post-award oversight

Future Research

- **Pilot implementation** of ERM-integrated framework in USCENTCOM construction contracts
- **Expand scope** to other contract types (food services) and geographic regions beyond construction services
- **Technology integration** - Develop AI-powered risk assessment tools and automated TIP monitoring systems
- **Quantitative evaluation** of framework effectiveness through longitudinal performance metrics

