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DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION OF CHILD AND FAMILY SERVICES
Helping people. It's who we are and what we do.



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MTL # 0505 – 020124

TO: Jill Marano, Director – Clark County Department of Family Services
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FROM: Betsey Crumrine, Acting Deputy Administrator, Division of Child and Family Services

POLICY DISTRIBUTION

Enclosed find the following policy for distribution to all applicable staff within your organization:

0214 Commercial Sexual Exploitation of Children (CSEC) Policy

This policy is/was effective: 02/01/24.

- This policy is new. Please review the policy in its entirety
- This policy replaces the following policy(s): MTL # _____ - _____ Policy Name: _____
- This policy has been revised. Please see below for the type of revision:
 - This is a significant policy revision. Please review this policy in its entirety.
 - This is a minor policy revision: (List page number & summary of change):

Addition of the following language (red font) to ensure compliance with new legislation (AB183).

Page 4 – 1. The following scenarios require a NRIT to be administered:

- a. During the initial assessment phase of an investigation
 - If the child is placed in the custody of the agency, the NRIT must be completed within five (5) business days.
 - If the child is not placed in the custody of the agency, the NRIT must be completed by the conclusion of the investigation.
- b. If the child is placed in the custody of the agency after the investigation has concluded
- c. When a child has returned from a run-away episode, regardless of placement type, for example, child is in foster care, child is placed with relatives or fictive kin, child is in a higher level of care, or child is placed home with their parents.
- d. Anytime in the life of the case where there are concerns that a child, regardless of age, may be a CSEC victim or is at risk of being a CSEC victim.

Page 11 - Assessing and Providing Services to CSEC

If after an initial screening (at intake) there is reasonable cause to believe the child is:

a victim of commercial sexual exploitation,

- A policy form has been revised: (List form, page number and summary of change):

NOTE:

- Please read the policy in its entirety and note any areas that are additionally required by your agency to be in compliance with the policy enclosed.
- This is an **ALL-STAFF MEMO**, and it is the responsibility of the person listed above to disseminate the policy enclosed to appropriate staff within his/her organization and to ensure compliance.
- The most current version of this policy is posted on the DCFS Website at the following address: <http://dcfs.nv.gov/Policies>
Please check the table of contents on this page for the link to the chapter you are interested in.

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0214 COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN (CSEC)

Policy Approval Clearance Record

<input checked="" type="checkbox"/> Statewide Policy	<input type="checkbox"/> New Policy
<input type="checkbox"/> Administrative Policy	<input checked="" type="checkbox"/> Modified Policy
<input type="checkbox"/> DCFS Rural Region Policy	<input type="checkbox"/> This policy supersedes:
Date Policy Effective:	6/27/2023
Attorney General Representative Review:	5/18/2023
DCFS Deputy Administrator Approval	02/01/2024
DMG Original Approval	08/30/2019
DMG Approved Revisions	02/01/2024

STATEMENT OF PURPOSE

Policy Statement and Purpose: The Child Welfare Agency will screen children involved with the Agency to identify if they are a victim of, or at high risk of, commercial sexual exploitation.

The purpose of this policy is to ensure certain measures will be taken when a child has been identified as a victim of commercial sexual exploitation or at high risk of commercial sexual exploitation. Once identified, proper authorities will be notified and the potential or confirmed victim CSEC children will receive prompt screening, assessment and services. This policy guides caseworkers on how to respond to a child victim of commercial sexual exploitation or those at high risk of exploitation.

AUTHORITY

Federal: [Preventing Sex Trafficking and Strengthening Families Act PL 113-183](#); [ACYF-CB-IM-14-03 Information Memorandum PL 113-183](#); [ACYF-CB-PI-15-07 Program Instruction PL 113-183](#); [Trafficking Victims Protection Act \(TVPA\) 42 U.S.C. § 5772](#); [Justice for Victims Trafficking Act \(JVTA\) PL 114 -22](#); [ACYF-CB-IM-15-05 Information Memorandum Child Abuse and Protection Treatment Act \(CAPTA\)](#); [Trafficking ACYF-CB-IM-15-05](#)

NAC: [NAC 424.476\(2\)\(5\)](#);

NRS: [NRS 432B](#); [AB 151 \(2019 Leg. Session as enrolled\)](#)

Other: [Model Coordinated Response Protocol and Toolkit to Address the Commercial Sexual Exploitation of Children in Nevada aka CSEC Coordinated Response Protocol and Toolkit](#); [ACYF Guidance to States and Services on Addressing Human Trafficking of Children and Youth in the United States](#)

DEFINITIONS

Agency Which Provides Child Welfare Services: In a county whose population is less than 100,000, the agency is a local office of the Division of Child and Family Services; or in a county whose population is 100,000 or more, the agency is the agency of the county, which provides or arranges for necessary child welfare services. May also be referred to as “Agency” or “Child Welfare Agency.”

Commercial Sex Act: The term “commercial sex act” is defined by the federal Trafficking Victims Protection Act as the giving or receiving of anything of value (money, drugs, shelter, food, clothes, etc.) to any person in exchange for a sex act.

Commercially Sexually Exploited Child (CSEC): Depending on the context, CSEC refers to commercially sexually exploited child(ren) or the commercial sexual exploitation of children. A variety of terms are used to address children who are sexually exploited, including victim, survivor, domestic minor who is sex trafficked (DMST) and CSEC. Victim is commonly used in referring to a child who has been abused and survivor is commonly used to refer to a child who was previously trafficked. However, sex trafficking survivors point out that current victims of exploitation are also survivors; their strength and

determination to survive enable them to live another day despite violence and exploitation. DMST refers to those who are U.S. citizens or legal permanent residents. In this policy, the acronym, CSEC, will be used as it addresses all minors in Nevada, whether domestic or foreign-born.

CSEC Informed: A CSEC-informed service provider is knowledgeable about recruitment, risk factors, indicators and the impact of exploitation on the CSEC. It essential to dispelling myths and stereotypes, recognizing CSEC victimization, understanding their unique needs and improving outcomes for CSEC. It is also essential to exploring and affirming each CSEC's individual experience.

CSEC Mentor-Advocates (CMA): Mentor-Advocates are utilized to assist victims as part of the CSEC MDT approach. Mentor-advocates, can be utilized in a variety of settings and roles, including for emergency response, welcoming CSEC at reception centers, outreach efforts with at-risk youth, CSEC case management and consultation to out-of-home caregivers and service providers.

CSEC Multi-Disciplinary Team (MDT): A multi-disciplinary team that provides a coordinated interagency approach to serving CSEC victims through assessment, service planning and case management. The team includes a small group of individuals who have a thorough knowledge of CSEC needs as well as experience working with CSEC. They support the collaborative process as they believe in its benefit to CSEC and the service delivery process. There are core members who participate in all MDT's and ad-hoc members who attend as needed. Core members include: CSEC victim, as appropriate, CSEC mentor-advocate, law enforcement, child welfare, juvenile services, and mental health. Ad-hoc members may include legal advocate, mobile crisis services, community service providers, placement providers, public health and substance abuse. MDT members determine which of their members will lead the MDT.

Exploited Child: A person under the age of 18 years who has been ([NRS 432.150](#)):

- a. Used in the production of pornography in violation of the provisions of [NRS 200.710](#),
- b. Subjected to sexual exploitation, or,
- c. Employed or exhibited in any injurious, immoral, or dangerous business or occupation.

Missing Child: A person under the age of 18 years who has run away or is otherwise missing from the lawful care, custody and control of a parent or guardian ([NRS 432.150\(4\)](#)).

National Center for Missing and Exploited Children (NCMEC): Assists families and law enforcement agencies, 24 hours per day, when they are notified a child is missing. This national center provides direct support to law enforcement for many investigative services necessary when a child is missing.

Nevada Rapid Indicator Tool (NRIT): An assessment tool utilized to determine if a child is a confirmed CSEC victim, at high risk, or if no risk factors are present at this time.

Person Responsible for Child's Welfare: The child's parent, guardian, stepparent with whom the child lives, an adult person continually or regularly found in the same household as the child, a public or private home, institution or facility where the child actually resides or is receiving care outside of the home for all or a portion of the day, or a person directly responsible or serving as a volunteer for or employed by such a home, institution or facility ([NRS 432B.130](#)).

Sex Trafficking: The recruitment, harboring, transportation, provision, obtaining, patronizing or soliciting of a person for the purpose of a commercial sex act. The commercial sexual exploitation of a child (CSEC), also referred to as child sex trafficking, is defined by federal law as a form of child sexual abuse, and involves the recruitment, harboring, transporting, provision or obtaining of a person under 18 years of age for a commercial sex act (i.e., when something of value is given to or received by any person). Force, fraud or coercion are not necessary for child sex trafficking. CSEC includes child prostitution, child pornography, trafficking of children for sexual purposes, child sex tourism, and forced marriage (Victims of Trafficking and Violence Protection Act).

State: An alternate word for the Division of Child and Family Services (DCFS) or Family Programs Office (FPO).

Survivor Informed: Seeking the input, expertise and guidance of those for whom services are intended makes it more likely services will meet their intended outcomes. Survivor voice in designing and implementing programming for CSEC provides a level of assurance that services will be experienced as "CSEC-friendly," encouraging CSEC participation and success. Additionally, survivors who are part of the service system for CSEC, such as in a community advocate role, can provide a sense of comfort and motivation for the CSEC; the survivor-advocate not only understands "the life" but also offers a model for successfully leaving "the life" and building a desired future.

Trauma Informed: All persons who work with CSEC recognize the signs of and diverse response to trauma. Policies and practices acknowledge the impact of trauma, emphasize physical, psychological and emotional safety for survivors, create opportunities for survivors to rebuild a sense of control and empowerment, provide treatment that enables recovery from trauma, and actively seek to avoid re-traumatization.

Victim Centered: A victim-centered approach places the victim at the heart of the planning and implementation of services in a meaningful way. This approach requires effort to engage and inform the victim so that they are empowered throughout the process; and youth decision-making is encouraged where consistent with safety. Service providers create positive partnerships with the child, identifying both the strengths and challenges of the child. The strengths of the child, family and community are leveraged to address their challenges and needs.

APPROACH

Philosophy for Identification of CSEC

The purpose of identification is to assist a CSEC in exiting the life, support their recovery and rebuild their life. Thus, identifying a CSEC as a potential or confirmed victim is of little benefit *to the CSEC* unless it begins the process of rebuilding trust with an adult they experience as reliable, caring, and nonjudgmental. This creates the potential for exiting the life and acceptance of services.

All children identified as potential or actual CSEC victims, through the use of the NRIT, must be treated as such. They are victims, not criminals, regardless of their age, crimes, or behaviors. They have a right to supportive services and must be treated with respect. It is important that any staff directly involved with potential or actual CSEC victims be trained and have the skills necessary to engage a CSEC.

STANDARDS/PROCEDURES

Intake Screening

Upon receipt of a report of a potential CSEC victim, the Child Welfare Agency shall conduct an initial screening to determine if there is reasonable cause to believe that the child is a victim of commercial sexual exploitation. The Child Welfare Agency shall make a report to the appropriate law enforcement agency. All reports should be screened in accordance with [NRS 432B](#), [AB 151](#) and [506 Intake and Priority Response Times](#).

1. When maltreatment is alleged against the person responsible for the child's welfare (as defined by [NRS 432B.130](#)), the report is screened for investigation using the priority response time outlined in [506 Intake and Priority Response Times](#).
2. When no maltreatment is alleged against the person responsible for the child's welfare (as defined by [NRS 432B.130](#)), the Child Welfare Agency may conduct an assessment to determine which services, if any, the family needs or refer the family to a person or an organization that has entered into a written agreement with the Agency to make such an assessment and provide appropriate services. If the family refuses or fails to participate in services, or if there are concerns of serious risk to the health and safety of the child, the contract agency will notify the Child Welfare Agency. If during the assessment, abuse or neglect is alleged or identified as defined by [NRS 432B](#), a new report should be screened according to [506 Intake and Priority Response Times](#).

Screening and Identification Using the NRIT

Note: if child is ever in immediate danger or at risk of harm, 9-1-1 should be called.

1. All children involved with the Agency, aged ten (10) years and older, will be screened using the Nevada Rapid Indicator Tool (NRIT) to assess if a child is 1) A confirmed victim of commercial sexual exploitation, 2) At high risk of commercial exploitation, or 3) No indicators apply to this youth at this time.
2. The NRIT is not meant to be used as a questionnaire, rather it requires the person administering it to use their cumulative knowledge of the child to complete. The purpose of the NRIT is to provide assessment and prevention for potential or confirmed victims of CSEC. The NRIT does not rely on self-disclosure of sex trafficking by a minor as CSEC rarely self-identify as a victim or disclose abuse. Rather, it includes indicators to consider in determining whether there is reasonable cause to believe the child is a victim, or at risk of being a victim, of commercial sexual exploitation. A copy of the NRIT is provided as CSEC Policy Attachment 01 to this policy.
3. The following scenarios require a NRIT to be administered:
 - a. During the initial assessment phase of an investigation
 - If the child is placed in the custody of the agency, the NRIT must be completed within five (5) business days.
 - If the child is not placed in the custody of the agency, the NRIT must be completed by the conclusion of the investigation.
 - b. If the child is placed in the custody of the agency after the investigation has concluded
 - c. When a child has returned from a run-away episode, regardless of placement type, for example, child is in foster care, child is placed with relatives or fictive kin, child is in a higher level of care, or child is placed home with their parents.
 - d. Anytime in the life of the case where there are concerns that a child, regardless of age, may be a CSEC victim or is at risk of being a CSEC victim.
4. Common “red flags” that may indicate the youth is a potential or confirmed victim of CSEC are:
 - a. Unexplained bruises, black eyes, broken bones or other physical injuries (that they are reluctant to explain).
 - b. Hypervigilance or paranoid behavior.
 - c. Chronic runaway/homeless youth.
 - d. Repeated phone calls from a “boyfriend” and/or excessive concern about displeasing a partner.
 - e. Relationship with an older person.
 - f. Gifts or unexplained possession of expensive clothing, jewelry or a cell phone.
 - g. Secrecy or vagueness about whereabouts, unaccounted for time or defensiveness in response to questions or concern.
 - h. Unexplained tattoo(s).
 - i. Gang affiliation – disclosed, reported or suspected.
 - j. Not enrolled in school or reduced performance or repeated absence from school.
 - k. Personal information regarding age contradicts behavior or appearance.
 - l. Hotel keys and key cards.
 - m. Prepaid cell phone.
 - n. Unable or unwilling to give local address or information about parent/guardian.
 - o. Not in control of his or her identification.
 - p. Sexually explicit profiles on social networking sites.
 - q. Reports multiple sexual partners, repeated sexually transmitted infections or pregnancies/abortions.
 - r. Use of lingo or slang from the life, such as referring to a boyfriend as “daddy.”
 - s. Wearing new clothes and/or getting hair or nails done with no financial means to do so independently.
 - t. Excess amounts of cash on hand.

5. If the NRIT indicates there are “no indicators apply to this youth at this time,” file the hardcopy NRIT in the case file and document in UNITY pursuant to local agency procedure.
6. If the NRIT indicates the child is at high risk refer the child for further assessment, file the hardcopy NRIT in the case file and document in UNITY pursuant to local agency procedure.
7. If the NRIT indicates a confirmed CSEC victim, file the hard copy NRIT in the case file and complete the following in UNITY:
 - a. Mark the “sex trafficking victim” on the person profile page.
 - b. Follow Agency business practices for ensuring the child receives a family assessment related to CSEC.
8. **Note**, once a youth is confirmed as a CSEC victim through use of the NRIT, the youth no longer need to be screened with subsequent NRITs when they return from a run-away episode.
9. Working with Law Enforcement
 - a. Complete a report with law enforcement as soon as reasonably practicable, but no later than 24 hours after identifying the child as a confirmed CSEC victim.
 - b. Obtain the police report number for UNITY and for future reference.
 - c. If Law Enforcement will not take a report due to insufficient information, document that a in UNITY Case Note.

Initiate Coordinated Response Protocol

Upon identification of a potential or confirmed victim of CSEC, a CSEC MDT is initiated to provide the potential or confirmed victim of CSEC with a coordinated, interagency approach to comprehensive assessment, safety planning, linkage to crisis services, service coordination and case management. There are multiple ways a CSEC MDT ([Coordinated Model Response Protocol](#) chapters 5 and 6) may be initiated and coordinated, including but not limited to the following examples:

1. Coordinating a Rapid Response MDT – Within six (6) hours.
 - a. In instances when the potential or confirmed victim of CSEC is identified by law enforcement, the response is considered urgent and in need of a Rapid Response MDT. The CSEC Mentor-Advocate (CMA) is met on-scene by one other MDT core member. This responding MDT coordinates efforts to address the potential or confirmed victim of CSEC’s immediate needs, conduct an initial needs assessment, develop an immediate CSEC safety plan, identify a placement resource, and coordinate services and supportive actions until the initial meeting of the full MDT. Participants of this Rapid Response MDT may include the potential or confirmed victim of CSEC, the CMA, the responding MDT core member, and the family/caregiver, if appropriate.
2. Coordinating a seventy-two (72) hour MDT
 - a. Within seventy-two (72) hours following an urgent response and for all non-urgent responses to the identification of a potential or confirmed victim of CSEC, the full MDT reviews and address’s the potential or confirmed victim of CSEC’s immediate needs. Depending upon the originating circumstance, these include initiating or following-up on immediate needs for clothing, food, placement and medical services, refining and implementing the CSEC safety plan, and coordinating services and supportive actions.
3. Coordinating at scheduled intervals
 - a. MDTs meet at regularly scheduled times to review the implementation of the case plan. They monitor the services provided, address barriers, ensure services are coordinated and revise the service plan, as needed.
4. Coordinating when circumstances change
 - a. MDTs reconvene immediately when significant events occur in order to address the potential or confirmed victim of CSEC’s changing service needs in a timely manner. Examples of such events include when the potential or confirmed victim of CSEC returns

from a runaway, disrupts from placement, or is arrested. These circumstances may also call for a Rapid Response MDT.

Assessing CSEC Safety

Recovery from trafficking is a process. During the process, a CSEC informed, and trauma informed individual must design a plan with the potential or confirmed victim of CSEC to increase their safety as well as the safety of any individual assisting them. Engaging a potential or confirmed victim of CSEC in safety planning requires patience and skill. Helpful tips on engaging and building rapport with a potential or confirmed victim of CSEC are provided as an attachment to this policy (CSEC Policy Attachment, 02: Ground Rules for Interaction).

It should be noted that language plays a significant role in interactions and interventions with potential or confirmed victim of CSEC. "Safety planning" is language familiar to professionals and may seem innocuous. However, many potential or confirmed victims of CSEC do not see themselves as "unsafe" and asking or implying that they are unsafe may be a deterrent to their accepting information to better care for themselves. Care should also be taken to not legitimize a potential or confirmed victim of CSEC's exploitation by referring to it as "work" or the trafficker as an "employer" (CSEC Policy Attachment 03: Do's and Don'ts for appropriate engagement with CSEC victims).

1. Assessing a potential or confirmed victim of CSEC safety is an ongoing process that must be considered at various points of involvement including:
 - a. At initial contact to address immediate safety needs.
 - b. During comprehensive, individualized service planning to address ongoing safety needs.
 - c. At regularly scheduled MDT to address any new safety needs.
 - d. In response to crisis events or upon return from runaway to address immediate/new safety needs.
2. In addition to addressing a potential or confirmed victim of CSEC's physical safety, it is also important to consider their emotional safety. The trauma and isolation experienced by a potential or confirmed victim of CSEC can make it difficult to process information and build relationships. They need supportive caregivers, treatment providers and a CSEC mentor-advocate who can provide emotional safety through unconditional acceptance and support throughout the course of care. Key aspects of emotional safety include providing:
 - a. Validation, as many potential or confirmed victim of CSEC encounters do not recognize they are hurt.
 - b. A calm and welcoming environment.
 - c. Choices.
 - d. Opportunities for small successes.
3. A CSEC safety assessment should be conducted to assess current risk of harm to the potential or confirmed victim of CSEC or their family members. The CSEC Safety Assessment Guide is used to assess safety and documented in UNITY Case Notes, type "CSEC," and should at minimum, include:
 - a. Traffickers' location and affiliation with organized crime.
 - b. History of threats or violence made by the trafficker against the potential or confirmed victim of CSEC or others.
 - c. Fears about potential safety issues, including risk of lethality.
 - d. Other connections to the trafficker or associates.
 - e. A potential or confirmed victim of CSEC's participation in prosecution of the trafficker, risk of retaliation and whether the trafficker is in custody.
4. Other potential or confirmed victim of CSEC safety considerations include:
 - a. Risk of harm to a potential or confirmed victim of CSEC's family from the trafficker or associates, including members of an organized crime network or gang.
 - b. Increased risk from complacent family members or friends.
 - c. Potential risks by linking the youth to his/her community and the potential connections to the trafficker or associates.
 - d. Potential risks to service providers from the trafficker or associates.

CSEC Safety Planning

Note. CSEC safety planning is a separate and distinct process from SAFE/SIPS safety planning.

1. An immediate CSEC safety plan is established upon first contact through the Rapid Response MDT and/or the 72-Hour MDT. Once the potential or confirmed victim of CSEC is safe and stabilized, an ongoing CSEC safety plan is created. The success of the ongoing CSEC safety plan is monitored and refined, as needed. This can occur during regularly scheduled MDTs or be initiated by crises or events, such as a return from runaway or a suicide attempt.
2. While a *written* CSEC safety plan may be required by an Agency or program to document their efforts to conduct safety planning with a potential or confirmed victim of CSEC, it is often unsafe for potential or confirmed victims of CSEC to have a copy of their safety plan. If a potential or confirmed victim of CSEC returns to a trafficking situation, it is likely their belongings will be searched. Taking a photo of the plan with a cell phone is also unrealistic as traffickers monitor potential or confirmed victims of CSEC's cell phones. Potential or confirmed victims of CSEC should be provided easily remembered phone numbers and information about supportive community resources. The Agency may document the CSEC Safety Plan in a UNITY case note, case note type "CSEC."
3. Safety strategies before leaving the trafficker. When brainstorming safety strategies with a potential or confirmed victim of CSEC who is contemplating leaving a trafficking situation, have the potential or confirmed victim of CSEC consider the following:
 - a. If in immediate danger call 911 or contact a trusted community agency, or friends and relatives, if appropriate, to notify them or ask for assistance.
 - b. Plan an escape route and think about a safe person or place you can go.
 - c. Call the National Human Trafficking Resource Center Hotline to obtain local referrals for shelter or other social services.
4. Safety strategies after leaving the trafficker. When brainstorming safety strategies with a potential or confirmed victim of CSEC after they have left a trafficking situation, have the potential or confirmed victim of CSEC consider the following:
 - a. Alter travel habits and the timing of daily routines.
 - b. Avoid the geographical area or cultural community the trafficker is known to frequent.
 - c. Consider changing phone numbers to a number unknown to the trafficker.
 - d. Always keep an emergency cell phone and emergency numbers with them.
 - e. Avoid use of social media and the internet.
 - f. Seek assistance in securing a protective order against the trafficker so they are legally prohibited from making contact.

Preventing and Responding to Peer Recruitment

Potential or confirmed victims of CSEC who are being trafficked may be intentionally used by a trafficker to recruit other youth into sex trafficking. Depending on their stage of recovery, the potential or confirmed victim of CSEC may engage in recruitment efforts in the same program through which they are receiving services, on the internet or in school. Residential programs are especially vulnerable to peer recruitment. To assist with addressing peer recruitment, consider the following:

1. Limit opportunities for peer recruitment by:
 - a. Place youth outside areas known for street prostitution.
 - b. Allow youth limited access to the internet.
 - c. Restrict cell phone use and screen phone calls.
 - d. Place CSEC in safe, secure location.
 - e. Keep placement addresses confidential.
 - f. If placing in a facility, ensure the facility understands the potential or confirmed victim of CSEC's specific needs and that they take measures to protect the potential or confirmed victim of CSEC.
2. Prevent peer recruitment by:

- a. Separate potential or confirmed victims of CSEC based on stage of recovery in order to prevent those who are most vulnerable to recruitment from being victimized by potential or confirmed victim of CSEC youth who are not yet engaged in services or ready to leave their trafficking situation.
 - b. Educate all youth about sex trafficking and recruitment tactics.
 - c. Educate parents and caregivers about how to prevent the sex trafficking of youth and what steps to take if they suspect a youth is being exploited.
 - d. Monitor for covert communications.
 - e. Monitor youth relationships and contacts as much as possible.
3. Responding to peer recruitment by:
- a. When a potential or confirmed victim of CSEC is suspected of attempting to recruit another youth, they should not be left alone with other youth unsupervised.
 - b. When a potential or confirmed victim of CSEC is suspected of recruitment, phone and internet usage should be restricted.
 - c. When a potential or confirmed victim of CSEC engages in recruitment repeatedly, their treatment needs should be reassessed to determine if they can better be served in another, more intensive program.

Placement Considerations

1. A continuum of housing and placement options may be needed over the course of the potential or confirmed victim of CSEC's recovery – from an immediate safe placement during a crisis or attempt to exit exploitation to a placement that supports long-term recovery.
2. Programs that offer housing must have CSEC-informed programming and an understanding of stages of change. They must also have appropriate safety measures in place that protect:
 - a. The potential or confirmed victim of CSEC from their trafficker.
 - b. The potential or confirmed victim of CSEC from other residents who may attempt to recruit them back into the life.
 - c. Other residents from any recruitment activity on the part of the potential or confirmed victim of CSEC.
3. In determining if a placement is appropriately matched to the potential or confirmed victim of CSEC's needs, major considerations include the type and level of support and supervision needed and the potential or confirmed victim of CSEC's stage of change. Questions to consider when making placement are:
 - a. Does the provider have appropriate CSEC-, trauma- and culturally informed, and victim-centered training and practices?
 - b. Does the provider understand the potential or confirmed victim of CSEC's holistic and complex needs?
 - c. Is the provider able to fully implement the CSEC safety plan?
 - d. Is the level of support and supervision appropriate to the needs of the potential or confirmed victim of CSEC?
 - e. What is the level of support available to the provider to support the continuity of the placement? Is the provider willing to accept support and services to maintain the placement?
 - f. Is the provider willing to coordinate with other service providers and participate as a member or guest of the CSEC's MDT?
4. If the placement under consideration is with the potential or confirmed victim of CSEC's family or friend, it should be determined whether they were complicit in any way with the potential or confirmed victim of CSEC's exploitation. If the family, friend or relative is deemed appropriate, the type of education and ongoing support needed to parent the sexually exploited youth must be clarified.

Preventing Runaways

1. The following questions and the checklist entitled Runaway Prevention Interventions Guide from the statewide policy Reporting, Locating and Responding to Missing Children ([FPO 0210C Runaway Prevention Interventions Strategies](#)), can be used to engage the potential or confirmed victim of CSEC in identifying triggers that might prompt a runaway episode. They also help identify coping strategies to prevent one.
 - a. What are your strengths? What are you good at?
 - b. What are some triggers or behaviors that you have noticed occur when you start to feel like running?
 - c. What has helped prevent you from running in the past?
 - d. Who is a good support to you when you feel like running?
2. For potential or confirmed victim of CSEC who have a history of repeatedly running away, it is important to provide information on locations of youth shelters and community-based agencies that provide support to CSEC, as well as national hotlines and local helplines. This communicates caring and supports the development of a trusting relationship.
3. In the event that a potential or confirmed victim of CSEC youth runs away, refer to policy 0210 Reporting, Locating and Responding to Missing Children

When a CSEC Returns from a Runaway

1. Warmly welcoming and engaging a potential or confirmed victim of CSEC upon return from a runaway episode is critical to relationship building. Ensuring their immediate safety and basic physical and emotional needs are addressed strengthens their connection to caring service providers.
2. Once immediate needs have been met, the potential or confirmed victim of CSEC should be debriefed by a trusted CSEC-informed adult of the youth's choosing, using the Returning Child Debriefing from the statewide policy Reporting, Locating, and Responding to Missing Children ([FPO 0210B Returning Child De-Briefing Tool](#)). The purpose of the debriefing is to clarify why the potential or confirmed victim of CSEC went missing and what happened while they were gone – including whether the youth was a victim of sex trafficking or other trauma. It is recommended that this debriefing tool be used each time a potential or confirmed victim of CSEC returns from a runaway episode.
3. Refer to the Reporting, Locating and Responding to Missing Children Policy for further instructions.

Assessing Ongoing Concerns and Underlying Needs

The potential or confirmed victim of CSEC may have needs in the following areas: safety; physical, sexual and reproductive health needs; mental health and substance use needs; legal advocacy needs; educational, vocational and skill development needs; supportive relationships and networks; placement and residential treatment needs.

1. Each potential or confirmed victim of CSEC's ongoing concerns and underlying needs are identified through a clinical assessment following either:
 - a. An Urgent Response, after the crisis is over and the potential or confirmed victim of CSEC is stabilized.
 - b. A Non-Urgent Response.
2. This assessment forms the basis of comprehensive, individualized service planning through the MDT. It should be noted that one of the benefits of the MDT is to eliminate unnecessary and duplicative assessments and potential re-traumatization of the potential or confirmed victim of CSEC. Service partners who participate in the MDT have access to the assessment which is used to jointly identify needed services.

Identifying Strengths and Resources

1. An acknowledgment of strengths that are meaningful to a potential or confirmed victim of CSEC can help them rebuild a positive sense of self, see possibilities and options, and create a hopeful outlook for the future. While it is essential to understand a potential or confirmed victim of CSEC's needs, it is equally important to help them identify their strengths and resources. In the context of assessment, functional strengths and resources are those that support attainment of service goals and ultimately the potential or confirmed victim of CSEC's recovery and desired life. As such, strengths should be identified, then nurtured and reinforced through inclusion in the potential or confirmed victim of CSEC's service plan.
2. Of particular importance, the strengths and resources must be meaningful to the potential or confirmed victim of CSEC. When they ring true to the potential or confirmed victim of CSEC, they provide hope and inspire action.
3. Strengths can be skills and abilities, helpful personal attributes, strategies that worked well in the past, formal, and informal supports, as well as interests and aspirations. These strengths can serve to protect the potential or confirmed victim of CSEC from further risk and abuse and be a springboard for addressing underlying needs and reaching the potential or confirmed victim of CSEC's goals.
 - a. Family strengths and support – a sense of identity, love and communication.
 - b. Interpersonal/social connectedness – ability to make/maintain relationships.
 - c. Educational setting – strengths of school/training setting that potential or confirmed victim of CSEC attends.
 - d. Optimism – positive orientation to the future.
 - e. Talents and interests – hobbies, skills, artistic interests/talents that give enjoyment and lead to a positive self-image
 - f. Spiritual/religious – beliefs and practices that provide comfort and support.
 - g. Potential or confirmed victim of CSEC involvement in care – understands their needs; participates in service planning.
 - h. Natural supports – unpaid individuals who provide positive support to potential or confirmed victim of CSEC.
 - i. Peer influences – peer social network has positive influence and behaviors.
 - j. Vocational – strengths of potential or confirmed victim of CSEC's school/vocational setting.
 - k. Resilience – potential or confirmed victim of CSEC's ability to use internal strengths and bounce back from stressful events.
 - l. Community life – potential or confirmed victim of CSEC's positive connections to people, places and institutions in their community.
 - m. Cultural identity – potential or confirmed victim of CSEC has a cultural identity that is supported by others.

Individualized Service Planning

While the caseworker will not complete the assessment of the potential or confirmed victim of CSEC or provide the direct services, they will be responsible to ensure the needs of the potential or confirmed victim of CSEC are met, through coordination with the MDT. When planning for the potential or confirmed victim of CSEC, consider their well-being, in the psychological, emotional, spiritual, educational, physical, and social aspects. CSEC Policy Attachment 06 Holistic Services List, groups services by area, that are often needed by and beneficial to the potential or confirmed victim of CSEC in their recovery process.

1. At a minimum, each potential or confirmed victim of CSEC should receive a clinical assessment as indicated above in assessing ongoing needs and underlying concerns section.
2. The potential or confirmed victim of CSEC will have specific needs and goals documented in UNITY Case Notes, type "CSEC."
3. Goals will be determined through discussion with the potential or confirmed victim of CSEC, their CSEC MDT and the clinical assessment. The goals will indicate desired behaviors or conditions that reflect or support improved functioning and well-being for the potential or confirmed victim of CSEC.

4. To avoid overwhelming the potential or confirmed victim of CSEC, three or four goals should be prioritized. Whenever possible, allow the potential or confirmed victim of CSEC to determine what is priority, this can lead to enhanced motivation, autonomy and trust for the potential or confirmed victim of CSEC.
5. A potential or confirmed victim of CSEC's stage of change should continually be assessed and considered as the potential or confirmed victim of CSEC may have a different perspective on where they are at with respect to their recovery and service needs.
6. Caseworkers should ensure that referrals for potential or confirmed victim of CSEC to service providers will be best served by service providers that have experience and training working with potential or confirmed victim of CSEC, who are victim centered and trauma informed.

Assessing and Providing Services to CSEC Victims

1. If after an initial screening (at intake) there is reasonable cause to believe the child is a victim of commercial sexual exploitation the Agency will conduct an assessment to determine which services, if any, the family needs or refer the family to a person or an organization that has entered into an agreement with the Agency to make such an assessment and if, appropriate provide counseling, training or other services relating to commercial sexual exploitation. A Child Welfare Agency may choose to assess these youth with internal staff or enter into a written agreement/contract with community agencies to assess and provide services to the child and their family.

If the child resides in another jurisdiction the Child Welfare Agency may initiate contact with an agency which provides child welfare in the jurisdiction in which the child resides to provide notification of the circumstances surrounding the child's removal from the jurisdiction or placement in another location.

2. The agreement with a person or organization who provides services to the potential or confirmed victim of CSEC, and their family shall require that person or organization to notify the Agency if the:
 - potential or confirmed victim of CSEC or their family refuses to participate in services, or
 - person or organization determines that there is a serious risk to the health or safety of the child.

Should the potential or confirmed victim of CSEC or their family refuse to participate in services, the Agency will be notified to reassess and determine if there should be an investigation under 432B.

Documentation (NCANDS requirements)

1. The following data is required to be obtained on *confirmed* CSEC as supported by the Nevada Rapid Indicator Tool (NRIT).
 - a. Sex exploitation allegation reported regardless of disposition.
 - b. Check "victim of sex trafficking" on person detail UNITY screen (CFS016).

Timeline:

Requirement	Deadline	Starting Date	Responsible Party	Actions to be Taken
Children 10-years old and older who become involved with the Agency, but are not in the custody of the agency be screened using the NRIT	Prior to conclusion of the NIA if not in agency custody or within 5 business days of the child being placed in custody of the agency	Case open date or when child is placed in custody during the investigation, if applicable	Assigned Case Worker	Administer the NRIT based on cumulative knowledge of child
Children 10-years old and older who are placed in the custody of the agency after the investigation has concluded be screened using the NRIT	Within 5 business days	When the child is placed in the custody of the agency	Assigned Case Worker	Administer the NRIT based on cumulative knowledge of child
Children returning from a run-away episode be debriefed using Returning Child Debriefing Tool	Within 24 hours of the child's return	Date child returns	Assigned Case Worker	Debrief the child using the Returning Child Debriefing Tool
Children returning from a run-away episode be screened using the NRIT unless a child was previously confirmed as a CSEC	Within 24 hours of the child's return	Date child returns	Assigned Case Worker	Administer the NRIT based on cumulative knowledge and information learned upon debriefing of child
Any child with warning signs of sex trafficking during any point in the life of a case be screened using the NRIT	Within 24 hours of warning signs being recognized	Date concerns are noted	Assigned Case Worker	Administer the NRIT based on cumulative knowledge of child
Coordinate a Rapid Response and alert the MDT for confirmed CSEC	Within 2 hours of confirmation of CSEC status	Date CSEC is confirmed	Assigned Case Worker or Intake Worker	Mobilize a rapid response to address CSEC's immediate, crisis related, safety and service needs and alert the CSEC MDT

Coordinate a 72-hour MDT	Within 72 hours	Date CSEC is confirmed or suspected	Assigned Case Worker or CSEC Member designated by Agency	Mobilize the CSEC MDT to review and address CSEC immediate needs
Coordinate an MDT at scheduled intervals and/ or when a significant event occurs	Every 90 days or as needed	Date CSEC is confirmed or suspected	Assigned Case Worker or CSEC Member designated by Agency	Mobilize the regularly scheduled MDT to review the implementation of the goals, monitor services provided, address barriers, ensure services are coordinated and revise goals as needed
Complete report with law enforcement and document in UNITY when child is confirmed as CSEC victim through NRIT screening	As soon as reasonably practicable but no later than 24 hours	When child is confirmed as CSEC through NRIT	Assigned Case Worker	Complete law enforcement report, obtain law enforcement report number, complete UNITY Case Note. If law enforcement will not take report due to insufficient information, document that in the UNITY Case Note
Conduct CSEC Safety Assessment (Using CSEC Safety Assessment Guide)	As soon as reasonably practicable but no later than 24 hours	At initial contact During comprehensive individualized service planning At regularly scheduled MDT In response to crisis events or upon return from runaway	Assigned Case Worker for each	Address any new, immediate and/or ongoing safety needs for the CSEC and document in UNITY Case Notes, type "CSEC"

Documentation: This section outlines what documentation must be done in the case files and/or UNITY to be in compliance with the state policy.

Case File Documentation (paper)

File Location	Data Required
<ul style="list-style-type: none"> Primary File Primary File 	<ul style="list-style-type: none"> Nevada Rapid Indicator Tool (NRIT) Returning Child Debriefing Tool

UNITY Documentation (electronic)

Applicable UNITY Screen	Data Required
<ul style="list-style-type: none">Person Detail CFS016Intake Form INT 200Case notes	<p>Mark the box "Victim of Sex Trafficking"</p> <ul style="list-style-type: none">Complete intake form and ensure an allegation of "sex trafficked" is added against perpetrator of trafficking.

JURISDICTIONAL ACTION

Development of Internal Policies:

1. Child Welfare agencies that contract community agencies to assess and serve potential or confirmed victim of CSEC youth and their families shall require the community providers to receive relevant CSEC specific training and to administer the NRIT to children aged ten (10) and older that they are working with.
2. Child Welfare agencies who enter into written agreements with persons or organizations to provide services to assess and serve potential or confirmed victim of CSEC youth and their families shall require those persons or organizations to have policy and procedure that mirror this CSEC Policy and adopt relevant best practice standards identified in the Nevada CSEC Coordinated Response Protocol and Toolkit.
3. Child Welfare agencies shall ensure that staff who serve potential or confirmed victim of CSEC have additional training in complex trauma and a thorough understanding of what potential or confirmed victim of CSEC have been through in order to effectively engage and work with potential or confirmed victim of CSEC.
4. Child Welfare agencies should have active Memorandum of Understanding (MOU) in place with each CSEC MDT team, which will be responsible to coordinate comprehensive assessment, safety planning and service coordination.
5. Child Welfare agencies may determine other collaborative processes to meet the requirements of an MDT, i.e., a Child and Family Team (CFT) meeting may substitute for an MDT as long as the specific CSEC MDT team members are present.
6. Child Welfare agencies will develop internal policy/procedure for how services to potential or confirmed victim of CSEC youth and their families will be documented, including: the NRIT, CSEC Safety Plans, and services to potential or confirmed victim of CSEC and their families where abuse and neglect by the family is not identified.

Supervisory Responsibility:

Provide guidance to caseworker during times of concern or uncertainty in regard to this policy.

STATE RESPONSIBILITIES

The State will provide technical assistance regarding program development and implementation to the child welfare agencies. The state will monitor ongoing compliance with this policy through the quality assurance process.

POLICY CROSS REFERENCE

Policies: [0204 Case Planning](#)
[0506 Intake and Priority Response Times](#)
[0801 Youth Independent Living Program](#)
[0210 Reporting, Locating and Responding to Missing Children](#)

History and Updates: This is a new policy.

ATTACHMENTS

- FPO 0214A – Nevada Rapid Indicator Tool
- FPO 0214B – Ground Rules for Interaction
- FPO 0214C – Do's and Don'ts of Appropriate Engagement with CSEC Victims
- FPO 0214D – CSEC Safety Assessment Guide
- FPO 0214E – Special Populations
- FPO 0214F – Holistic Services List