

# VDSS Human Trafficking Prevention Designation

## Provider Requirements



### Overview

The Virginia Department of Social Services (VDSS) is implementing the Trafficking Prevention Designation for VDSS licensed Child Residential Facilities (CRF) and Department of Behavioral Health and Developmental Services (DBHDS) licensed Therapeutic Group Homes (TGH) effective April 1, 2026. This designation will support wider efforts that VDSS has made to better address the vulnerabilities of children in foster care to the risk of human trafficking. It will equip CRF and TGH providers with the tools and skills to identify victims of trafficking and provide youth in their care with important prevention education. Additionally, it will meet the [Family First Prevention Services Act](#) (FFPSA) requirement for title IV-E federal funding of congregate care placements by “providing high-quality residential care and supportive services to youth who have been found to be, or are at risk of becoming, sex trafficking victims.” Virginia defines “high-quality residential care” as licensed CRF and TGH facilities with trained staff, and “supportive services” as screening for and reporting human trafficking victimization, service referrals for victims, and youth trafficking prevention education. Beginning April 1, 2026, the designation is required for the placement of youth in foster care ages 13 and up in a CRF or TGH. Local departments of social services (LDSS) will not be able to utilize either IV-E or CSA funds for payment of placements of youth in foster care ages 13 and up in CRFs and TGHs that do not have the Trafficking Prevention Designation.

### Youth Eligibility

Children and youth with a history of involvement in the child welfare system are inherently at higher risk of trafficking than their peers without involvement, and those ages 13 and up are more likely to have additional risk factors (Child and Family Services Manual, Chapter E. Foster Care, Section 6B.6.1). Therefore, all youth in foster care ages 13 and up are considered to be at risk of becoming trafficking victims and are eligible.

### Provider Requirements

Providers are required to attest to and maintain records of meeting the following requirements. (In addition to the tools/resources that have been preapproved for use, providers may request approval to use alternate options to meet certain requirements. Items with an \* denote where alternate options are permissible. The request to use an alternate tool/resource must be made to and approved by VDSS in writing prior to use. Providers must ensure this written approval is retained in their records.)

1. Provider facilities must be licensed, and maintain licensure, as either:
  - a. VDSS licensed Child Residential Facility (CRF) ([Virginia Administrative Code - Title 22. Social Services - Agency 40. Department of Social Services - Chapter 151. Standards for Licensed Children's Residential Facilities](#)), or
  - b. DBHDS licensed Therapeutic Group Home (TGH) ([Virginia Administrative Code - Title 12. Health - Agency 35. Department of Behavioral Health And Developmental Services - Chapter 46. Regulations for Children's Residential Facilities](#))

2. Staff trained in human trafficking awareness and mandated reporting. All direct care staff and their supervisors must complete required training. Providers must ensure that their staff complete the training requirements and retain training records. Staff should complete training within 30 days of employment and annually thereafter.
  - a. Mandated Reporter Training – In accordance with licensing requirements, staff must complete mandated reporter training within 30 days of employment and annually thereafter. This training is provided free and online by VDSS:
    - i. [CWSE 5692 - Recognizing & Reporting Child Abuse & Neglect](#).
    - ii. Completion of this course as presented by a local department of social services, if so offered, will also meet the requirement.
  - b. Normalcy Training – In accordance with the Preventing Sex Trafficking and Strengthening Families Act, children and youth in foster care must be provided with as normal a childhood as possible. All direct care staff and their supervisors must complete training to understand and apply the Reasonable and Prudent Parent Standard to the provision of normalcy. This training is provided free and online by VDSS:
    - i. [CWSE3030: Normalcy for Youth in Foster](#) – Offered free and online by VDSS
  - c. Human Trafficking Awareness\* – All direct care staff and their supervisors must be trained and able to define human trafficking, recognize high risk populations, identify victims, and be prepared to respond. These competencies can be met through completion of any one or more of the following trainings:
    - i. [CWSE4000 - Identifying Sex Trafficking in Child Welfare](#) - Offered free and online by VDSS
    - ii. [DCJS Human Trafficking 101](#) - Offered free and online by Virginia Department of Criminal Justice System
    - iii. [Sexual Exploitation Treatment and Training Services \(SETTS\)](#) - Offered in-person and costs may be covered by DCJS
    - iv. [OnWatch training](#) - Offered free and online by the OnWatch organization
3. All youth will be screened for history of victimization within 90 days of placement. Providers must retain results of screening in the youth's file.
  - a. Screening includes review of youth files for previously documented experiences with trafficking and disclosures by youth. VDSS has created a screening tool available to providers:
    - i. VDSS Trafficking Victimization Screening Tool
4. Refer youth with trafficking experience to services that address the trauma. Providers must ensure that reports and referrals for services made are documented in the youth's file.
  - a. All new allegations of trafficking victimization of youth under the age of 18 must be reported to DSS (to LDSS, VDSS Child Abuse & Neglect Hotline (800)-552-7096, or [VDSS Mandated Reporter Portal](#)).
  - b. The provider must notify the foster care worker at the LDSS where the youth is in care.
  - c. Youth should be referred to services in partnership with their team. The requirement for service referral can be met through direct referral to services (internal or external) or through provider participation in treatment team meetings, child and family team

meetings, service planning meetings, and/or Family Assessment and Planning Team meetings, where services to address the trauma of experiencing trafficking are discussed.

5. Human trafficking prevention education for youth in placement.
  - a. Youth are to receive trafficking prevention education within 90 days of placement and at least annually thereafter. Providers must ensure that completion of prevention education is documented and that certificates of completion are retained in the youth's file and are shared with the youth and their LDSS caseworker.
  - b. Education components include understanding what trafficking is, identifying warning signs and trafficker behaviors, ways youth can reduce their own risk, and where to find help. The following curriculum has been preapproved:
    - i. [FreewayNC](#) – Curriculum offered free and online to providers through AbolishNC

### **Receiving & Maintaining Designation**

The Trafficking Prevention Designation is granted by VDSS to CRFs and TGHs that implement all requirements. Providers are responsible for ensuring ongoing compliance with designation requirements.

1. Initial Designation
  - a. CRF and TGH providers must submit the completed application to [FamilyFirst@dss.virginia.gov](mailto:FamilyFirst@dss.virginia.gov).
  - b. VDSS will review and approve applications. Approval letters will be sent to providers verifying their designation. The list of all approved providers will be publicly available on the [VDSS Family First website](#).
2. Annual Renewal
  - a. Providers must submit annual renewal requests to [FamilyFirst@dss.virginia.gov](mailto:FamilyFirst@dss.virginia.gov).
  - b. VDSS will review and approve renewal requests for providers continuing to meet the requirements of the designation. Approval letters will be sent to providers verifying renewal and designation for the next year.
3. Loss of Designation
  - a. VDSS reserves the right to rescind the designation from any provider who becomes unable or unwilling to meet the requirements. VDSS will reach out to providers at risk of losing their designation. Providers are encouraged to partner with VDSS to resolve any concerns.
  - b. Designation is required for the placement of youth in foster care ages 13 and up. Loss of designation will result in the inability for these youth to be placed, or maintain placement, in those facilities.

### **Questions**

Providers may reach out to the VDSS Trafficking Prevention Designation team at [FamilyFirst@dss.virginia.gov](mailto:FamilyFirst@dss.virginia.gov).