



The Defense Contract Management Agency's Combating Trafficking in Persons Integrated Process Team meets to discuss the CTIP program at DCMA Headquarters on Fort Lee, Va. (Photo by Mark Woodbury, DCMA Public Affairs)

DCMA engages with and supports DOD CTIP program

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Throughout the world, people are abused and mistreated in their work places and exploited by their employers for illegal and immoral purposes. They are promised jobs and then exploited as sex slaves. Others are promised good wages to support their families but end up living in hovels, earning sub-standard pay for backbreaking work. Their passports, taken by those who exploit them, are held to prevent them from leaving the country. Unable to pay off their service debts or return home, these workers end up financially and physically trapped in their jobs.

As unbelievable as it might seem, some of the businesses and employers who engage in this illegal conduct are contractors and sub-contractors working on Department of Defense contracts.

DOD CTIP PROGRAM

In early 2012, the White House initiated an awareness campaign that restated the United States' commitment to combating

all forms of modern day slavery, including trafficking in persons. The campaign will culminate on New Year's Day 2013, as part of the recognition of the 150-year anniversary of the signing of the Emancipation Proclamation. This national campaign is intended to raise awareness about the government's anti-human trafficking initiatives and to bring more non-government entities into the fight.

DOD CTIP Program and Task Force's efforts focus on training, raising awareness and prevention. "We want to make sure workers are aware of their own rights," said Linda Dixon, DOD CTIP program manager. "We take action to raise awareness about trafficking in persons at home and overseas. We focus on prevention and work on increasing command and military police's ability to pursue and understand human trafficking. Protecting workers is crucial to protecting human rights over seas and in ensuring that contractors follow applicable laws and regulations."

The department has increased awareness of DOD's CTIP Program's effectiveness as applied to contracting and contractors.

Every agency, service and combatant command within DOD is required to have a dedicated person assigned to support CTIP initiatives. "We've had contractors violating TIP laws," said Dixon. "We went to DCMA to look at devising policy to stop contractors from exploiting their workforce and to help us enforce compliance with existing laws. DCMA is our boots on the ground in this effort."

DCMA CTIP PROGRAM

As the Defense Contract Management Agency remains a major player in combating trafficking in persons, the agency is increasing its efforts to fight illegal trafficking in persons. CTIP efforts are more than just the annual individual stateside, and higher profile overseas, training requirement.

To support the national and DOD-wide campaign, DCMA Director Charlie E. Williams created and staffed a DCMA CTIP program to combat trafficking in persons. Patsy Oburn leads DCMA's efforts as DCMA's CTIP program manager. Williams

and the DCMA Council also approved an agency-wide charter; the chartered program will define and develop CTIP processes and policy to support DOD's overarching CTIP program.

On July 26, Oburn conducted an Initial Program Review to prepare and present the charter for approval to Williams and the other DCMA Council members. Once approved, Oburn conducted a formal CTIP Integrated Process Team kickoff meeting to review the charter and initiate the plan to complete the program. The kickoff initiated a robust and rigorous DCMA policy development effort to support DOD's goals.

"I truly feel that being a part of this team is a great honor as I know this is an important program," said Anita Buchanan, a member of the DCMA CTIP IPT. "I am very excited to see DCMA step up and take the lead on this challenge with such heartfelt sincerity."

The DCMA IPT includes: Patsy Oburn and Teresa Izarraras, DCMA Combat Support Center ; Craig Scott and Kaylee Gouldie, DCMA International; Robert Dowell, Contracting; Jim Morris, Quality Assurance; Debbie Elwell and Anita Buchanan, Human Capital; John Hebb and Rick Denman, Operations; Jack Robinson, Special Programs; Jackie Noble, Public Affairs; Michael Sainsbury, Office of General Counsel; Susan Farinacci, Office of Independent Assessment; Russell Geoffrey, Contract Integrity Center; Erikka Veney, Information Technology; and Sean T. Miller, Keystone Intern.

"DCMA's CTIP IPT is expediting the policy development process based upon direction from Mr. Williams," Oburn said. "A major benefit to having a DCMA policy is that DCMA employees will be able to easily locate the information, tools and recommended actions to support CTIP in one location."

DCMA CTIP EFFORTS

"CTIP was initially considered a contingency contracting issue; however, human trafficking is not exclusive to contingency environments," Oburn explained. "It is important for DCMA to support the various DOD CTIP

requirements. We ensure DCMA compliance to DOD Instructions and provide membership on the DOD CTIP Task Force and develop DCMA CTIP policy that is fully defined, consistent and integrated with the necessary tools to perform oversight; ensure compliance with the Defense Federal Acquisition Regulations System; and conduct annual agency-wide CTIP training." The agency expects to achieve 100 percent completion of 2012 CTIP training by all DCMA employees.

As part of the CTIP DCMA contingency contract surveillance and prevention efforts, quality assurance personnel have traditionally asked to see contractor employees' passports in Iraq and Afghanistan. This is one method of identifying potential TIP violations. Different types of contracts and different environments will require various identification methods. "These efforts will be expanded to all contracts as the policy is developed and implemented," Oburn said. "DCMA will engage the entire contract management team, not just quality assurance personnel, in the CTIP DFAR surveillance efforts."

Since CTIP operates under the Federal Acquisition Regulations and Defense Federal Acquisition Regulations, potential violations may lead to contractual non-compliance. The DCMA Contract Integrity Center will support and manage DCMA's CTIP investigative efforts, such as through Inspector General requests and investigative referrals. Contractual actions are the primary remedy, but in appropriate cases, criminal sanctions will be sought.

With this focused effort and implementing DOD's guidance, DCMA will be on the frontline of combating trafficking in persons.

Any person who suspects a CTIP violation should report the concern immediate to their administrative contracting officer. Reports can also be made to the National TIP Hotline at 1-888-3737-888 or by e-mail at <http://ctip.defense.gov>.

(Air Force Col. Steven Buetow, Patsy Oburn, Michael Sainsbury, Anita Buchanan and Linda Dixon contributed to this article.) 

Evolution of CTIP Policy

Richard Ginman, Defense Procurement and Acquisition Policy director, testified March 27, to the House Oversight and Government Reform explaining how DOD has implemented the Trafficking Victims Protection Act of 2000 and its subsequent reauthorizations. Noting that DOD policy relates to contracting activities in Iraq, Afghanistan and other locations throughout the world, Ginman explained that "DOD policy has evolved over time, in 2004, the Secretary of Defense put forth his zero tolerance policy on CTIP, which was addressed to all DOD members."

"(This policy) prohibits any activities on the part of contractor employees that support or promote trafficking in persons and imposes suitable penalties on contractors that fail to monitor the conduct of their employees," he said.

Ginman cited a rule related to preserving worker's rights during his testimony: "(DCMA and other DOD organizations must remind) contractors of the prohibition . . . against knowingly destroying, concealing, removing, confiscating, or possessing any actual or purported passport or other immigration document . . . (or) attempt to prevent or restrict, without lawful authority, the person's liberty to move or travel, in order to maintain the labor or services of that person." A complete transcript of Ginman's opening statement is at <http://oversight.house.gov/wp-content/uploads/2012/03/3-27-12-TechIP-Ginman.pdf>.