SPS Anti-Human Trafficking Reporting Flow Chart

Pre-Award
- Manage PIP
  - If yes to expenditures outside US Select HT compliance plan in Coeus under special review

PI
- Answer questions in PIP
- Receives letter and/or letter & checklist
- Take State Dept., training & ensure all staff and subs working on project does as well
- Complete & return checklist if applicable
  - Receives compliance plan

Post-Award
- Check Coeus for HT compliance plan under special review tab
- If HT is checked, forward coeus info to RQA
  - If HT not checked, establish award
- If budget expenditures >$500K, forward Coeus info to RQA
- If budget expenditures <$500K, establish award
  - Monitor report for expenditures >$500k and forward SAP and Coeus info to RQA when appropriate
  - Notified by RQA to establish award

RQA
- Check PIP for yes answers if applicable
- Send PI appropriate letter and checklist
- If applicable, go over checklist and determine if there is a need for compliance plan
- If there is a need for a compliance plan, contact legal counsel
- If no need for plan, notify post award to release grant
- Notify post award and PI of compliance plan

Data

Legal Counsel etc.
- Create report for expenditures >$500K & International flag
- Receives notice of need for compliance plan
- Work with RQA if there is a need for compliance plan