

Anti-Human Trafficking

SPS Processing Plan

Participation identified during PIP/Award Process

The FAR Clause 22.17 and 52.222-50 only apply when the funding instrument that we receive contains the FAR clauses in it.

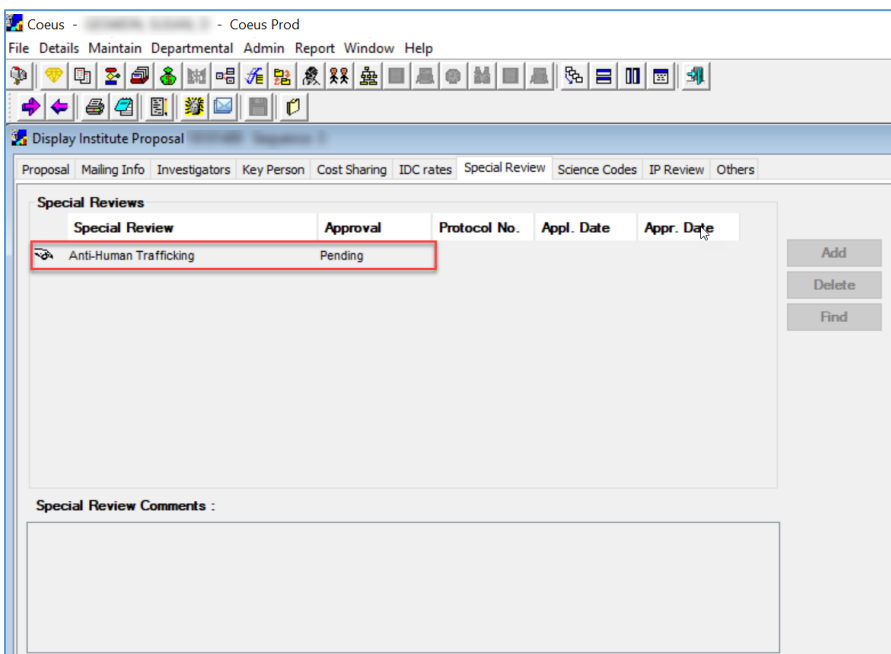
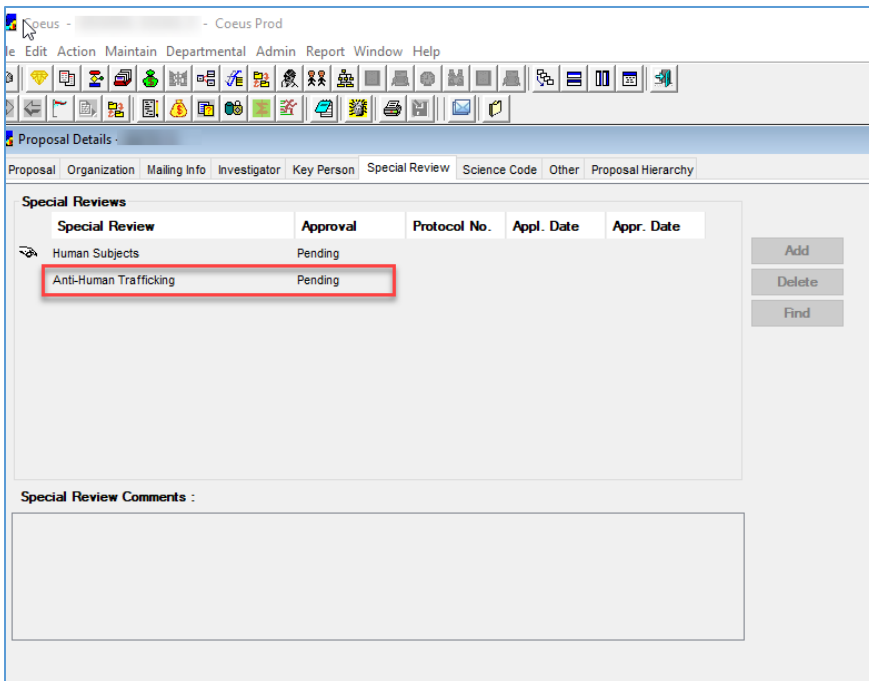
The Anti-Human Trafficking flag indicates that the grant contains the FAR clauses in the award documentation or after an award has been identified and reviewed after expending \$500,000.

Principle Investigator (PI)

- PI completes the Proposal Information Portal (PIP) Worksheet. If the Anti-Human Trafficking question (see below) is answered “Yes”, then Pre-Award takes action.
- I certify to awareness and agree to comply with the University’s zero tolerance policy/guidelines on combatting trafficking in persons Yes
- Do you estimate on this project that expenditures incurred for activities outside the United States will exceed \$500,000, including subcontract activity? Yes No
 - If yes,
 - Will the project be recruiting employees? Yes No
 - Will the project be providing housing to employees? Yes No
- If the answer to the first question is Yes, then the PI will receive a letter and Initial PI Compliance Plan Checklist from the Research Quality Assurance team. These need to be completed and returned quickly. Pi will notify all grant and subcontract personnel that the training must be reviewed.
- If there will be recruiting of employees or housing provided to employees, the PI will receive a compliance plan from Purdue’s Legal Counsel.

Pre –Award

If PI has answered “Yes” to the Anti-Human Trafficking question in PIP, federal law requires a compliance program to be put in place for the University and any subcontractors to prevent human trafficking activity. In order to track these grants, Pre-Award should record the Anti-Human Trafficking value in the Special Review tab of the proposal (both Proposal Development & Institute Proposal) record.



Post Award

When setting up a grant, post award staff should do the following:

- Check Coeus IP record special review tab to see whether the Anti-Human Trafficking compliance plan is selected. This may be an indicator that the FAR clause is included.
- Review award documentation for the FAR Clause 22.17 and 52.222-50. If this is present, set the Anti-Human Trafficking flag on the grant to Y.
- If the grant includes sub awards, ensure Anti-Human trafficking has been added to the Subrecipient Risk Analysis process.
- Add completed checklists or compliance plans to Perceptive Content.
- If required, complete Annual Report and send to agency. Put a copy in Perceptive Content under the grant.

Research Quality Assurance (RQA)

- Upon award, RQA will receive notification from Post Award that Anti-Human Trafficking was indicated in the proposal or award documentation.
- Check PIP after notification from post-award that HT was checked in SAP
 - If yes is checked for expenditures outside the US to exceed \$500K, send appropriate letter to PI and determine whether there is a need for a compliance plan
 - If recruitment and housing plan is checked, send appropriate letter to PI and determine whether there is a need for a compliance plan.
- RQA will send PI a letter and checklist to determine if a compliance plan is necessary.
- Review responses to checklist and determine if there is a need for a compliance plan. Refer to legal counsel if either Recruitment & Wage Plan or Housing Plan is needed.
 - If compliance plan is not needed, notify post award administrator to establish award and put copy of letter and completed checklist in Perceptive Content under SPS Anti-Human Trafficking document type.

Legal Counsel

- Review completed Initial PI Compliance Plan Checklist. If either Recruitment & Wage Plan or Housing Plan is indicated, prepare Compliance Plan.
- Send completed Compliance Plan to RQA and PI.

Participation identified via Report

Research Quality Assurance (RQA)

- On an annual basis, run Review for Anti-Human Trafficking Grants report & send to Post Award for review.
- Receive notification from Post Award that grant Anti-Human Trafficking Flag set to Y.
 - RQA will send PI a letter and checklist to determine if a compliance plan is necessary.
 - Review responses to checklist and determine if there is a need for a compliance plan. Refer to legal counsel if either Recruitment & Wage Plan or Housing Plan is needed.
 - If compliance plan is not needed, notify post award administrator to establish award and put copy of letter and completed checklist in Perceptive Content under SPS Anti-Human Trafficking document type.
 - Review grants on list. Is the grant active? Are the expenses predominantly S&W? Are the expenses predominantly outside the US? If the grant is active, not all S&W and is mostly outside the US, send PI the certification to acknowledge they are aware of the policy.

Post Award

- Add completed checklists or compliance plans to Perceptive Content.

Principle Investigator (PI)

- If the answer to the first question is Yes, then the PI will receive a letter and Initial PI Compliance Plan Checklist from the Research Quality Assurance team. These need to be completed and returned quickly. Pi will notify all grant and subcontract personnel that the training must be reviewed.
- If there will be recruiting of employees or housing provided to employees, the PI will receive a compliance plan from Purdue's Legal Counsel.

Legal Counsel

- Review completed Initial PI Compliance Plan Checklist. If either Recruitment & Wage Plan or Housing Plan is indicated, prepare Compliance Plan.

Send completed Compliance Plan to RQA and PI.