Anti-Human Trafficking

Sponsored Program Services (SPS) Processing Plan

Anti-Tracking Policy (III.C.3) prohibits Human Trafficking at Purdue University. The SPS Processing Plan document explains how Purdue University will implement this policy at Purdue in relation to grants. This grant plan is triggered by either the FAR Clauses 22.17 and 52.222-50 being included in an award document or where Uniform Guidance sections 175.100, 175.105, 175.200, 175.205, 175.300, Appendix A to Part 175 apply to a grant.

The SPS Processing plan will be used when the grant is expected to have expenditures over $500,000 and work will be done outside the US.

Grants that should follow this processing plan can be identified in PERA by having the Terms & Conditions and the International Scope fields marked as relevant. These fields can be found in the Grants Terms and Conditions section of the award and on General Award Tab in PERA Question 29 (International Scope). This link explains what each term or condition in PERA signifies: NEW-Post-Award-PERA-Terms-Conditions-Infographic-V2-7.31.24.docx.

Responsibilities

Post Award

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

1. Review award documentation for the items listed below. If these are true, mark the Anti-Human Trafficking terms and conditions and the International Scope question.
    a. Is the FAR Clause 22.17 and 52.222-50 present?
    b. Are expenditures expected to be over $500,000? and Is there any international component?
2. If the grant includes sub awards, ensure Anti-Human trafficking has been added to the Subrecipient Risk Analysis process.
3. Add completed checklists or compliance plans to PERA.
4. A monthly report will be received that lists Grants where the Anti-Human Trafficking Terms and Conditions are noted. Review the grants on the list to ensure they are appropriate. Make sure any required correspondence has been completed.
5. If required, complete the Annual Report and send to the agency. Put a copy in PERA under the grant.

Research Quality Assurance (RQA)

1. RQA will receive a monthly report on grants that Anti-Human Trafficking was identified in the award documentation. Review the master data to determine if further action is required.
2. If the grant does qualify, RQA will send the Pl a letter (Initial PI Compliance Plan Checklist_2025) and checklist to determine if a compliance plan is necessary.
3. Review responses to the completed checklist and determine if there is a need for a compliance plan. Refer to legal counsel if either a Recruitment & Wage Plan or Housing Plan is needed.

Principal Investigator (Pl)

1. Complete the Anti-Human Trafficking Compliance Plan Checklist and return it to RQA.
2. Assure that all applicable staff in their area have completed the training identified under Reference Material below. The PI should document the names and dates of when training was completed.
3. If a Compliance Plan is needed, work with Legal Counsel to create the plan.

Legal Counsel

1. Review completed Initial Pl Compliance Plan Checklist. If either the Recruitment & Wage Plan or the Housing Plan is indicated, prepare the Compliance Plan.
2. Send the completed Compliance Plan to RQA and Pl.

Reference Material

Purdue Anti-Trafficking Policy (III.C.3)

U.S. Department of Homeland Security: **Blue Campaign**

Blue Campaign: **Human Trafficking 101 Information Sheet**

U.S. Department of Homeland Security: **Blue Campaign (One Voice. One Mission. End Human Trafficking) Awareness Videos**

Full text of the Act can be found at: **IC 35-42-3.5 Chapter 3.5 Human and Sexual Trafficking**