

Compliance with University Policy # 4022: Combating Human Trafficking”

In the next few weeks, the University will be publishing a policy on Combating Human Trafficking to be in compliance with 2 CFR 200, the FAR, and our System for Award Managing (SAM) certifications. To be in compliance request us to capture information on proposals during the pre-award process; identify those proposals that fall under the policy so that contracts can ensure an appropriate certification and compliance plan is in place for those awards, and then required annual reports is complete.

BACKGROUND:

Please see University Policy # 4022 for more details scope, policy statement, definitions, compliance, reporting suspected activity, and required compliance plans to combat human trafficking.

George Mason’s compliance plan applies to all George Mason faculty, staff, students, faculty affiliates, visiting faculty, contractors, vendors, and authorized volunteers and other agents working on:

1. Federal grants or cooperative agreements where the estimated value of services to be performed outside of the United States exceeds \$500,000; or
2. Federal contracts for supplies (other than Commercially-Available off-the-shelf Items), or federal contracts for services, either of which are purchased or performed outside of the United States and where the value of the supplies or goods exceeds \$550,000.

At the award stage, and each year thereafter, the PI is responsible for the Federal Award and for implementation of this Compliance Plan must submit to OSP a Certification Form prior to the awarding of the Federal Award and annually thereafter certifying one of the following compliance statuses:

- After conducting due diligence, to the best of the individual’s knowledge and belief, no Covered Individuals and/or Entities have engaged in human trafficking; or
- The individual is aware that human trafficking violations have occurred, has taken appropriate remedial and referral actions, and actions to prevent future violations have been taken.

The PI responsible for the Federal Award must provide the above Certification Form to Procurement and OSP.

PRE-AWARD PROCESS:

- 1) To identify proposals that would fall under this guidance, a new question has been added to RAMP. Under the Additional Proposal Information page, a new question #8 has been added, asking: Are you providing services or purchasing services, equipment or goods (other than commercial, off the shelf products) outside the United States? If the PI answers yes, a box will open asking for a brief description of the services or equipment or goods and the estimated dollar amount.

The screenshot shows the 'Additional Proposal Information' section of the RAMP system. On the left is a navigation menu with four items: 'Budget Periods and Key Dates', 'Compliance Review', 'Additional Proposal Information' (which is highlighted in orange), and 'Completion Instructions'. The main content area contains three questions:

7. If applicable, select the University Transdisciplinary Research Centers with which this proposal is affiliated:

- ☐ Center for Advancement of Human-Machine Partnership (CAHMP)
- ☐ Center for Adaptive Systems of Brain-Body Interactions (CASBBI)
- ☐ Center for Resilient and Sustainable Communities (C-RASC)
- ☐ Quantum Science and Engineering Center (QSEC)
- ☐ Center for Humanities Research (CHR)

8. Are you providing services or purchasing services, equipment or goods (other than commercial, off the shelf products) outside the United States?

☒ Yes
☐ No
[Clear](#)

1. Provide a brief description and the estimated dollar amount.

[Text input box]

9. Please select the most appropriate discipline for classification for the annual National Science Foundation (NSF) Higher Education & Research Development Survey (Note: Only applicable for projects classified as Research).

[Dropdown menu with a three-dot icon]

- a.) Services is a broad term that can incorporate many activities under grant awards being conducted outside the United States, including but not limited to training, consulting, and teaching. Purchases of services from overseas could include, but is not limited to consultants, subject matter experts, trainers, translators, etc. Equipment and goods are as traditionally defined in 2 CFR 200 and the FAR.

- b.) The dollar amount would be the estimated aggregate amount of dollars in the budget for those services, purchased services, equipment, or goods that are provided or purchased OUTSIDE the United States. This number may change from the proposal stage to the award stage, but represents the amount in the proposal budget.
2. Department Research Administrators are responsible for ensuring that Question 8 is answered. If there is a Yes answer, please work with the PI to fill in the required information in the box.
3. Once the proposal comes to OSP for Specialist review, OSP GA's will follow the revised review checklist and identify any proposal with a Yes answer to question 8 **AND** a dollar amount for the activities that exceeds \$500,000 for grants and \$550,000 for contracts. If the dollar amount exceeds these thresholds, the OSP GA will add a TAG to the proposal. **The TAG to use is: Human Trafficking Compliance Required**
 - a. The TAG will transfer to the Contracts RAMP Module should the award be funded and contracts can initiate the development of the plan and obtain the certification of compliance.

POST AWARD PROCESS

1. When setting up award, **Post Award Team** checks "manage tags" on new setups
 - If human trafficking is tagged, **Post Award team** sends the award to contracts to review, even if it's an award that does not typically go to contracts
2. **Contracts team** will send out the initial certification form to PI for signature and notify PIs to initiate the development of a compliance plan, in accordance with the University policy
3. **Post Award team:** When setting up award, deliverable for certification should be set up annually (like NASA China certification)
 - This deliverable will be assigned to the RA
 - Annual certification will be emailed to PI
 - RA attaches certification to the award record and mark deliverable complete
4. Subs also must comply with completing the certification if they receive over \$500k for the items listed above
 - **Post award team** will put in the sub award request with a request to send out the initial certification
 - **Contracts team** will disseminate initial certifications to subrecipients at the point of issuance.
 - For annual certification, **post award team** will be processing sub award modification for next year and will request contracts send out certification to sub.