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Office of Sponsored Research

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TO: Principal Investigators; Department Chairs; Labs and Centers; Deans of the Schools of Engineering and Science, Howe School of Technology Management, Systems and Enterprises; and the College of Arts and Letters

FROM: Dr. George Korfiatis, Provost

SUBJECT: SIT Implementation of Trafficking Victims Protection Act of 2000 as amended

DATE: May 15, 2008

The Federal Government in its on-going determination to combat worldwide trafficking in persons such as forced labor, sexual exploitation, or modern-day slavery has instructed its funding agencies to include, as a condition of any grant, contract or cooperative agreement, wording authorizing termination of the award if the recipient (e.g., SIT) engages in severe forms of trafficking in persons<sup>1</sup>, in the procurement of commercial sex acts during the period of performance of the contract, or in the use of forced labor in the performance of this project. The government defines trafficking in persons in detail in the attached chart.

At this point NIH has just announced its implementation of the Act and all new Department of Defense grants and contracts already contain this requirement. We expect to see this requirement in all federally funded grants, contracts and cooperative agreement sin the near future. In order to implement the specifications of the statute, the Federal Government requires that universities notify employees working on federal research projects of the requirement and the penalties for violating the Act.

Although there is no formal requirement for SIT to establish an Institute policy, procedure, awareness program or auditable statement as a result of this requirement, it is the responsibility of the Principal Investigator who receives an award with these requirements to take the actions outlines below:

1. The Principal Investigator shall –
  - a. Notify his/her staff working on the award of –
    - i. The United States Government's zero tolerance policy described the above referenced act and clauses; and

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<sup>1</sup> The term ``severe forms of trafficking in persons'' means-- (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.  
(22USC7102.8)

- ii. The actions that will be taken against employees for violations of this policy. Such actions may include, but are not limited to, removal from the contract, reduction in benefits, or termination of employment; and
  - b. Take appropriate action, up to and including termination, against employees or subcontractors that violate the policy
- 2. The Principal Investigator shall inform OSR immediately of –
  - a. Any information he/she receives from any source (including host country law enforcement) that alleges an employee, subcontractor, or subcontractor employee has engaged in conduct that violates this policy; and
  - b. Any actions taken against employees, subcontractors, or subcontractor employees pursuant to this clause

The full text of the [Act](#) and the notice from the Office of the President can be found at the embedded hyperlink, or at <http://www.whitehouse.gov/omb/memoranda/fy2008/m08-03.pdf>. I am also including a copy of the Act as part of this announcement.

I appreciate your help in implementing this new federal requirement. Please contact Barbara DeHaven in the Office of Sponsored Research with any questions regarding this new requirement. She can be reached at x8762 or [bdehaven@stevens.edu](mailto:bdehaven@stevens.edu)

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