

JMU-CISR Countering Trafficking in Persons (TIP) Compliance Plan

Award S-PMWRA-24-GR-0021

Support for the Regional Explosive Hazards Training Center

Dushanbe, Tajikistan

Purpose

To ensure, to the best of our knowledge, that neither any CISR employee nor any subrecipient, contractor, subcontractor, or agent thereof is currently engaged in any of the prohibited activities listed under 2 CFR § 175.105(a), including:

- a. Engaging in human or sex trafficking or procuring commercial sex acts during the award or contract period.
- b. Using forced labor to perform the award or contract.
- c. Destroying, concealing, confiscating, or otherwise denying access to an individual's identity or immigration documents, such as passports or drivers' licenses.
- d. Using misleading or fraudulent practices during the recruitment process for work on a project outside the U.S., such as failing to disclose, in a format and language understood by the potential worker, key terms and conditions of the employment, such as wages and fringe benefits, work location, living conditions, housing costs, and any hazardous nature of the work.
- e. Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- f. Charging recruitment fees to the individuals recruited to work on the award.
- g. Providing or arranging housing that fails to meet host country housing and safety standards.
- h. If required by law or contract, failing to provide an employment contract, recruitment agreement, or similar work paper in writing in the employee's native language prior to the employee departing from their country of origin to work on the contract in another country.
- i. Under certain circumstances, failing to supply return transportation, at the conclusion of the work, if the worker is not a national of the country in which the work occurs and was brought into the country to work on the federal award.
- j. Performing other acts that directly support or advance trafficking in persons, as described in 2 CFR § 175.105(a)(4)

Plan

CISR has a four-pronged Countering Trafficking in Persons Compliance Plan to meet the requirements set forth in 2 CFR § 175.105(b)(4) and (5), including the following core elements:

- ✧ **Awareness:** All employees, subrecipients, and contractors will be informed of the prohibition on trafficking and trafficking-related activities and the penalties for violations through a mandatory training and awareness program.
 - CISR Principal Investigators will provide all employees, subrecipients, and contractors working on the project with this Compliance Plan and with information on 2 CFR § 175.105, which outlines the US government policy on anti-trafficking, including definitions and penalties for violations.
 - CISR will post its Countering Trafficking in Persons Compliance Plan on its organizational website.
 - CISR will encourage its employees, subrecipients, and contractors to view the video trainings on “General Awareness,” “Labor Trafficking,” and “Sex Trafficking” created by the U.S. Department of Homeland Security, available at <https://www.dhs.gov/blue-campaign/videos>.
- ✧ **Reporting:** All employees, subrecipients, and contractors are required to report suspected trafficking or trafficking-related activities, without fear of retaliation.
 - **What should CISR’s employees, subrecipients, and contractors do if they suspect trafficking, trafficking-related activities, or other violations of this Plan?**
 - CISR’s employees, subrecipients, and contractors must immediately notify the **JMU Police** (Emergency line +1 (540) 568-6911; Non-emergency line +1 (540) 568-6912; pd_dispatch@jmu.edu; MSC 6810 Harrisonburg, VA 22807 U.S.A.) to report an incident of suspected human trafficking activity or other conduct that appears to involve force, fraud, or coercion. The JMU Police are responsible for responding to all credible reports and coordinating with the appropriate federal, state, and local agencies.
 - Where suspected human trafficking activities would also violate JMU Policy 1302: Equal Opportunity and Non-discrimination, CISR’s employees, subrecipients, and contractors are also encouraged to notify **JMU’s Office for Equal Opportunity** (+1 (540) 568-6991).
 - CISR’s employees, subrecipients, and contractors are also encouraged to make use of resources such as the [National Human Trafficking Hotline](https://www.dhs.gov/blue-campaign/videos) at +1 (888) 373-7888 or the **Global Human Trafficking Hotline** (1-844-888-FREE), as well as resources available from the **U.S. Department of State** at <https://www.state.gov/domestic-trafficking-hotlines>.
 - CISR’s employees, subrecipients, and contractors must also immediately notify the **Principal Investigator(s)**:
 - For award S-PMWRA-24-GR-0021, the Principal Investigators are Christina Kilby (+1 (540) 568-2715; kilbyca@jmu.edu) and Nicole Neitzey (+1 (540) 568-2315; neitzenx@jmu.edu).

- CISR's Principal Investigator(s) must immediately notify the **JMU Office of Sponsored Programs**:
 - For award S-PMWRA-24-GR-0021, the OSP contact is:

Director of Office of Sponsored Programs - Administrative Services
MSC 4107 Harrisonburg, VA 22807 U.S.A.
Phone: 540-568-5842
Email: grants@jmu.edu
- **What should the JMU Office of Sponsored Programs do if they receive a report of suspected trafficking, trafficking-related activities, or other violations of this Plan?**
 - OSP is responsible for reporting the suspected violation to the federal Contracting or Grants Officer and Inspector General of the awarding agency.
 - For award S-PMWRA-24-GR-0021, the Grants Officer is:

Keavy Baylor, Grants Officer
U.S. Department of State
Bureau of Political-Military Affairs
Office of Weapons Removal and Abatement (PM/WRA)
Cell: +1 (202) 531-5829
Email: BaylorKL@state.gov
 - For award S-PMWRA-24-GR-0021, the Inspector General can be contacted at:

Office of Inspector General (Department of State) Hotline
<https://www.stateoig.gov/about-hotline>
+1 (202) 647-3320
- ⊄ **Recruitment and Wage Policies:** To the extent that CISR uses a recruitment company during the course of the project, only recruitment companies with trained employees may be used, who prohibit charging recruitment fees to the employee, and who ensure that wages meet applicable host-country legal requirements.
 - Note: Award S-PMWRA-24-GR-0021 does not involve recruitment.
- ⊄ **Housing Standards:** To the extent that CISR will provide or arrange housing during the course of the project, CISR must receive documentation or other supporting information that ensures the housing meets host-country safety standards.
 - Note: Award S-PMWRA-24-GR-0021 may require CISR employees, subrecipients, or subcontractors to travel. The award does not involve providing or arranging housing for any people other than CISR employees, subrecipients, or subcontractors who travel to the project site.

Compliance Procedures

Compliance with the above plan is monitored by the following means:

- ✧ **Risk Assessment:** Prior to entering into agreements with subrecipients or contractors, CISR conducts a risk-based assessment of each party regarding TIP-related concerns.
- ✧ **Monitoring:** CISR monitors subrecipients and contractors through our direct engagements and through media reports, flagging any activity that may indicate TIP or related activities.
- ✧ **Contractual Obligations for Subrecipients or Contractors:**
 - o All subawards and contracts will include a copy of this Plan.
 - o Subrecipients and contractors will be required to certify compliance with this Plan annually (during the lifetime of the award).
 - o Subrecipients and contractors must flow down the Combating Trafficking in Persons clauses to any of their subcontractors.
- ✧ **Corrective Action and Termination:** Sanctions for violations will be commensurate with the severity and/or frequency of the offense and may include termination of awards, subaward contracts or agreements; termination of employment for employees; expulsion from the university for students; removal of affiliate status for affiliates; and loss of privileges and/or no trespass orders for any individual. Violation of federal or state laws against human trafficking may result in criminal prosecution of responsible individuals.

Certification

The undersigned, as Principal Investigator(s) and employee(s) of James Madison University, working on the above referenced project, acknowledge the following:

1. I have reviewed and understand this Countering Trafficking in Persons Compliance Plan and agree to comply with the requirements contained therein.
2. I understand that I cannot begin work on this project until I sign and submit this agreement.
3. James Madison University will furnish this Compliance Plan to the Contracting Officer upon request.
4. Annually, as of the Effective Date, I will certify to James Madison University's Office of Sponsored Programs one of the following compliance statuses:

To the best of my knowledge and belief, neither I nor any James Madison University employees working on this project, or subrecipients, subcontractors, or their agents on this project, have been engaged in human trafficking or trafficking-related activities; or

If abuses relating to any of the prohibited activities identified in 2 CFR § 175.105, have occurred, appropriate remedial and referral actions have been taken.

Certified by:

Christina Kilby

Principal Investigator Signature

Date

Ch. Kilby

09/12/25

Nicole Neitzey

Co-Principal Investigator Signature

Date

Nicole Neitzey

09/12/25