



Standard Administrative Policy and Procedure

Subject: Anti-Human Trafficking and Forced Labor

Number: UW SAP 9-3.7

I. PURPOSE

The University of Wyoming is committed to complying with all applicable state law and federal regulations regarding combating trafficking in persons. This Policy complies with Federal Acquisition Regulation 52.222-50 and 2 CFR Part 175. It provides clear restrictions for University employees and its Agents and outlines additional requirements for the completion of a Compliance Plan in limited situations.

II. DEFINITIONS

Agents: Any individual, including an employee, student, officer, or an independent contractor, authorized to act on behalf of or represent the University.

Coercion: Includes any one (1) or more of the following:

- A. The use or threat of force, abduction, serious harm to or physical restraint against any individual;
- B. The use of a scheme, plan, pattern or fraudulent statement with intent to cause an individual to believe that failure to perform an act will result in serious harm to or physical restraint against any individual;
- C. The abuse or threatened abuse of the law or legal process;
- D. The abuse of a position of power or taking advantage of a position of vulnerability;
- E. Providing a controlled substance to an individual for the purpose of controlling the person's behavior;
- F. Interfering with lawful custody of or access to an individual's children;
- G. The destruction of, taking of or the threat to destroy or take an individual's identification document;
- H. The use of an individual's personal services as security payment or satisfaction for a real or purported debt if:
 - 1. The reasonable value of the services is not applied toward the liquidation of the debt;
 - 2. The length of the services is not limited and their nature is not defined;
 - 3. The principal amount of the debt does not reasonably reflect the value of the items or services for which the debt was incurred; or
 - 4. The individual is prevented from acquiring accurate and timely information about the disposition of the debt.

Commercial Sex Act: Any sex act on account of which anything of value is given to or received by any person.

Forced Labor: Knowingly providing or obtaining the labor or services of a person by threats of serious harm to, or physical restraint against, that person or another person; by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or by means of the abuse or threatened abuse of law or the legal process.

Human Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person explicitly intended for labor or services through the use of force, fraud, or coercion for subjection to involuntary servitude, debt bondage, slavery, or sex trafficking.

Principal Investigator (PI): The primary individual responsible for the overall conduct of the research or project under a federal award, ensuring compliance with all U.S. laws, this Policy, and, if applicable, a Compliance Plan.

III. POLICY

Certain restrictions related to Human Trafficking and Forced Labor are detailed within Wyoming state law and federal regulations. To maintain compliance with these laws and regulations, no University employees or Agents shall:

- A. Engage in, or partner with other universities or industry partners engaging in, severe forms of trafficking in persons, which includes sex trafficking in which a Commercial Sex Act is induced by force, fraud, or Coercion; or 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,
- B. Procurement of any sex act on account of which anything of value is given to or received by any person,
- C. Use of Forced Labor,
- D. Destroy, conceal, confiscate, or otherwise deny access or threaten to deny access to an individual's identification or immigration documents, such as passports or drivers' licenses, regardless of issuing authority,
- E. Use misleading or fraudulent practices during the recruitment of employees or students or offering of employment or enrollment, such as failing to disclose, in a format and language understood by the potential employee or potential student, basic information or making material misrepresentations during the recruitment regarding the key terms and conditions of employment or enrollment, including but not limited to wages and fringe benefits, the location of work, the living conditions,

housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work, or type or duration of the academic credential being pursued.

- F.** Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place,
- G.** Charge employees or potential employees recruitment fees,
- H.** Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for:
 - 1.** An employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a federal contract or subcontract (for portions of contracts performed outside the U.S.); or
 - 2.** An employee who is not a U.S. national and who was brought into the U.S. for the purpose of working on a federal contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the U.S.).

However, return transportation or payment for the cost of return transportation upon the end of employment are not required when:

- 1.** An employee legally permitted to remain in the country of employment chooses to do so or is exempted by an authorized official of the sponsoring federal agency from the requirement to provide return transportation or pay for the cost of return transportation. Requests for such authorizations from the sponsoring federal agency shall be coordinated with and approved by the Office of Pre-Award Services within the Research and Economic Development Division, or
 - 2.** A victim or witness of Human Trafficking or Forced Labor, or an enforcement action related to either, who is seeking victim services or legal redress in the country of employment. The University shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity.
- I.** Provide or arrange housing that fails to meet the host country housing and safety standards, or
 - J.** If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work

document(s) shall be in a language the employee understands. If an employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

Upon notification of any violations of law, this Policy, or an applicable Compliance Plan, as described below, all University employees and Agents will fully cooperate with law enforcement, University administration, including Employee Relations or the Dean of Students Office, and any applicable federal funding entity's Contracting Officer and Inspector General to provide any credible information received from all sources regarding any violations..

IV. COMPLIANCE PLAN REQUIREMENTS

Pursuant to Federal Acquisition Regulation 52.222-50 and 2 CFR Part 175, University employees serving as PIs on certain federal awards have the added responsibility of working with the Office of Pre-Award Services to create and maintain a Compliance Plan, when applicable.

A. Applicability. In addition to those listed above, the responsibilities and requirements listed in this Section IV are applicable for the duration of the performance of any portion of a federal contract, grant, or cooperative agreement (including subcontracts) that is:

1. For supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States; and
2. Has an estimated, cumulative value that exceeds \$500,000.

B. Minimum Requirements. When a Compliance Plan is required, PIs must work with the Office of Pre-Award Services to make sure that a lawful Compliance Plan is in place. It must include, at a minimum, the following:

1. An awareness program regarding the prohibited Human Trafficking-related activities, including those described in Section III above, and the actions that will be taken against employees or Agents for violations.
2. A process for employees and Agents to report, without fear of retaliation, activity inconsistent with this Policy.
3. A recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees for

employees, and ensures that wages meet applicable host-country legal requirements or explains any variance.

4. A housing plan, if housing will be arranged or provided, that ensures that the housing meets host-country housing and safety standards.
5. Procedures to prevent Human Trafficking and Forced Labor and to monitor, detect, and terminate any employees or Agents that have engaged in such activities.

C. PI Responsibilities. When a PI receives a contract, grant or cooperative agreement from the federal government meeting the criteria above, they shall:

1. Ensure any Compliance Plan in place is followed and notify the Office of Pre-Award Services should the need for a Compliance Plan arise after an award has begun.
2. Notify all employees, Agents, and those working under the federal contract, grant, or cooperative agreement, such as partners, subcontractors, subawardees, and volunteers, about the zero-tolerance policy of engagement in any form of Human Trafficking or Forced Labor.
3. Post the Compliance Plan in the area for which work is to be performed.
4. Inform the University's Office of Pre-Award Services immediately upon discovery of any violation of law, this Policy, or the Compliance Plan and collaborate with University administration to take appropriate action against those in violation.

D. University Responsibilities. During the completion of a proposal stage for a contract, grant or cooperative agreement from the federal government meeting the criteria above, the Office of Pre-Award Services will work with the PI to:

1. Ensure incorporation of a specific provision into the contract, grant, or cooperative agreement outlining a Compliance Plan appropriate to the size and complexity of the contract, grant, or cooperative agreement and the nature and scope of the activities to be performed,
2. Notify University employees, Agents, subcontractors, and subrecipients of the actions that will be taken against them for violations of federal regulations, this Policy, or the Compliance Plan. Such corrective actions for employees or Agents may be implemented pursuant to applicable federal, state, and University laws, policies, and procedures, which may include, but are not limited to, removal from participation on the contracted research or activity or termination.

3. Develop procedure with PIs to prevent, and discipline for, the engagement in any form of Human Trafficking or Forced Labor.
4. Upon notification of any violations of law, this Policy, or the Compliance Plan, inform and fully cooperate with the funding entity's Contracting Officer and the agency Inspector General of any credible information it receives from any source regarding the violation(s) as well as any actions taken against a University employee or Agent.
5. With the assistance of the relevant PIs, submit annual certifications to the Contracting Officer of the agency providing the award.

V. REPORTING AND CORRECTIVE ACTION

- A. **University Reporting Requirements:** The University is required to report violations of federal law, this Policy, or the Compliance Plan, which may result sanctions.
- B. **Employee Reporting Requirements.** University employees and Agents are required to report any credible information regarding Human Trafficking to the University, either online through [UW Ethics Point](#) or by calling **833-921-5214**. Reports may also be made directly to the Global Human Trafficking Resource Center by calling the hotline at **1-844-888-FREE** or emailing help@befree.org.
- C. **Corrective Action.** Violations of this Policy or the applicable Compliance Plan by University employees or Agents, could result in sanctions including, but not limited to, removal from the contracted research or activity or termination pursuant to applicable federal, state, and University laws, policies, and procedures, such as the Employee Handbook and Student Code of Conduct.

Responsible Division/Unit: Research and Economic Development Division

Source: FAR 52.222-50, Combating Trafficking in Persons for Federally Funded Contracts and 2 CFR Part 175, Trafficking in Persons for Federally Funded Grants and Cooperative Agreements.

Links: <http://www.uwyo.edu/regs-policies>

Associated Regulations, Policies, and Forms: None

Approved: 11/24/2025