



Cheat Sheet for KOs and CORs

Pre-Award checklist

- Look up contractor's history of compliance in CPARS and FAPIIS
- Insert CTIP Clause found in FAR 52.222-50 in all solicitations and contracts
- Confirm contract is over the \$550,000 threshold for supplies of other than COTS goods acquired outside the U.S. or the performance of services outside the U.S.
- If it meets those criteria, obtain and review contractor compliance plan for the following:
 - Acknowledgement of nine prohibited trafficking and trafficking-related activities
 - An awareness program
 - A process for employees to report
 - A recruitment and wage plan
 - A housing plan (if applicable)
 - Procedures for reporting credible information about TIP to KO
- Include CTIP in the Quality Assurance Surveillance Plan
- Obtain certification letter from company certifying that the company:
 - Has implemented a compliance plan to prevent prohibited activities in FAR Clause 52.222-50 (b)
 - To the best of their knowledge, the company, its agents, subcontractors or their agents are not engaged in prohibited trafficking related activity described in FAR clause 52.222-50 (b)
 - If there are any reported abuses or credible information of abuses received from any source alleging conduct that violates FAR 52.222-50, the company will take appropriate remedial action

Post-Award Checklist

- Check CTIP Clause (FAR 52.222-50) is in the contract
- If required, discuss the Certification and CTIP Compliance Plan with the contractor and any sub-contract requirements
- Review list of prohibited activities and new required activities
- Review U.S. Law and Policy
- Review CTIP Provisions of Quality Assurance Surveillance Plan (QASP)
- If provided, add copies of contractor trafficking in persons awareness and education materials to the record
- Document contract record to reflect the Post Award Conference with Contractor



Cheat Sheet for KOs and CORs

During Performance of Contract Checklist

- Review the nine prohibited trafficking in persons activities
- Remember: TIP in government contracting does not usually present as people in chains
- Know the main types of TIP allegations in DoD contracting -e.g., passports withheld, recruitment fees, purchase of goods or services from contractor using forced or child labor; charged etc.
- Know the common signs and indicators of TIP in DoD contracting
- CORS: document non-conformances and requests for corrective actions
- CORS report TIP or credible information from any source about TIP to KOs
- KOs – upon credible information from COR, contractor, or any other source, promptly notify the IG, agency debarring and suspending official, and if appropriate law enforcement officials
- Know the remedies for TIP Violations outlined in FAR 52.222-50 (e)
- Report TIP violations to FAPIIS

Close out of Contract Checklist

- Obtain all information needed to write final report from CORs, technical office, contracting office, program management office, and, where appropriate, quality assurance and end users of the product or service
- Draft final report/performance evaluation based on interim evaluations. Review all information from the field, including any trafficking in person violations, to complete report
- Write your report in clear non-technical language. Include a clear, non-technical description of the principal purpose of the contract or order and should reflect how the contractor performed. The evaluation should include relevant information that accurately depicts the contractor's performance and be based on objective facts supported by program and contract or order performance data
- Include all relevant information about substantiated TIP violations