

UW-Madison Process for Department of Education Section 117 Reporting, Revised December 2020

Research and Sponsored Programs (RSP) Automated Process Occurs

- An automated process runs in January and July of each calendar year. The process sends an email to a set group of users on January 2nd & 3rd and July 2nd & 3rd. The email is sent twice to ensure that people receive it. It contains a reminder to the recipients that foreign contracts need to be reported to the U.S. Department of Education. The email contains a link to a website (https://www.rsp.wisc.edu/services/admin/foreign_contracts.cfm) with a list of foreign contracts reported to the Board of Regents by RSP.
 - The automated email is sent to the Gifts Manager, Business Services and copied to the Assistant Vice Chancellor for Business Services and Controller; Director of Grants and Contracts, RSP; Chief Data Strategist, Office of Student Financial Aid (OSFA); and Associate Director for Federal Awards, OSFA.
- When an individual goes to the website, a query runs in the background and displays data on the page. The query returns agreements of any awarded amount from a foreign sponsor. Agreements include both grants and contracts. The query includes direct awards, e.g., Novartis to UW-Madison, and flow-through awards, e.g., Novartis to University of Minnesota to UW-Madison.
- The RSP data appears on the website in three sections.
 - First section: Individual awards of \$250,000 or more from foreign sponsors in the most recent six month period (January – June or July – December) appear at the top of the page.
 - Second section: This section shows all awards from foreign sources received in the six month period, with the data rolled up by source. The foreign sources that have provided the largest cumulative amounts appear at the top of the list.
 - Third section: This section shows each individual award received from a foreign source, sorted by date received.
- To generate the reportable and potentially reportable RSP contract data for the Department of Education, a button on the webpage indicates “Generate Report.” The data is then exported into an Excel spreadsheet that can be analyzed in comparison to other institutional data.
- The automated email with the webpage link from RSP helps set in motion remaining steps.

UW-Madison Departments, Divisions & Intermediaries Are Contacted

- UW-Madison departments and divisions receive an email from the Division of Business Services (DoBS) requesting that they complete a form with information about any contracts entered into or payments received from foreign sources during the previous six months (either January – June or July – December). Divisions will be provided a list of recent fee-for-service agreements with foreign sponsors for which they may have received payments. The list will represent a starting point for potentially reportable information and will not be all inclusive.

- Intermediary Organizations
 - An email will be sent to these organizations by DoBS to request that they complete a form about any contracts entered into or payments received from foreign sources during the previous six months (either January – June or July – December).
 - Certain organizations will receive this email on a regular basis, including UW Foundation & Alumni Association, UW System Office of Trust Funds, and Wisconsin Alumni Research Foundation.
 - Other intermediary organizations will receive this email for the January 2021 report (for calendar year 2020). From the information received, a determination will be made on the frequency with which to solicit information on foreign source receipts from these organizations.
 - Additionally, DoBS will include a question in the annual survey administered to UW-Madison affiliated organizations. The question will ask the organizations if they have received any funds from foreign sources during the previous fiscal year.
- UW-Madison divisions (and/or departments when applicable) and intermediary organizations will submit completed forms to DoBS by the due date specified.

Division of Business Services Compiles Its Data & Reviews Submitted Data

- In addition to the steps described in the previous section, DoBS will review and compile data on incoming wire transfers that Cash Management has collected on a monthly basis. Cash Management pulls data on incoming wire transfers, flagging which payments are received from foreign sources. Cash Management also records the funding string that the payments are coded to. This will provide documentation on what payments are coming in from foreign sources and for what purpose they are being used. DoBS will follow up on any foreign source receipts not captured by UW-Madison divisions that meet the reporting threshold to determine if they need to be included in the semi-annual reporting.
- The Gifts Manager reviews the University's gift revenue transaction history for the six-month period to identify any potential foreign gifts received that, in combination with other gifts or contracts from that foreign source, would meet or exceed the \$250,000 threshold.
- The Gifts Manager engages with the Bursar's Office to query for and provide foreign, third party sourced funds received for student tuition for the applicable reporting period.
- The Gifts Manager compiles and provides any foreign gift and contract data for the University (from DoBS, RSP, and any UW-Madison divisions) and any intermediary organizations that meets the reporting threshold to the Associate Director for Federal Awards.
- The Gifts Manager will provide information back to intermediary organizations regarding any amounts submitted to DoBS that meet the reporting threshold and will be included in the report to Department of Education.

Office of Student Financial Aid Collates & Submits Data

- The Associate Director for Federal Awards collects the information from the Gifts Manager.
- The Associate Director for Federal Awards will create a new Foreign Gifts and Contracts report in January and July to report the appropriate foreign gifts and contracts from the previous 6

months or calendar year to the U.S. Department of Education. The report is created and submitted in an online reporting portal hosted by Department of Education:

<https://partners.ed.gov/foreigngifts>.

- The Department of Education makes the data publicly available on this website: <https://www2.ed.gov/policy/highered/leg/foreign-gifts.html>.