


Name of Policy <a href="#">Foreign Gifts &amp; Contracts Reporting</a>			
Policy Number: 3364-15-19			
Approving Officer: President			
Responsible Agent Chief Compliance Officer			
Scope All Campuses Including UT Foundation			
Original effective date: March 3, 2021			
Key words: Foreign, Gift, Contract, Report, Education, Research, Aid, Foundation, Source			
<input checked="" type="checkbox"/>	New policy proposal	<input type="checkbox"/>	Minor/technical revision of existing policy
<input type="checkbox"/>	Major revision of existing policy	<input type="checkbox"/>	Reaffirmation of existing policy

(A) Policy statement

The University receives Title IV federal student aid. Section 117 of the Higher Education Act of 1965 (20 U.S.C. § 1011f) requires higher education institutions that receive Title IV federal student aid to submit disclosure reports to the Secretary of Education if they receive gifts or contracts from any foreign source, contracts with any foreign entity and any ownership interest in, or control over the higher education institution by a foreign entity of which the aggregate value is \$250,000 or more. Whenever it appears that an institution has failed to comply with the requirements of this section, including any rule or regulation promulgated under this section, a civil action may be brought by the Attorney General.

This policy implements the requirements of Section 117 of the Higher Education Act of 1965, 20 U.S.C. § 1011f, which requires the University to disclose gifts, contracts, and/or restricted and conditional gifts or contracts from or with foreign sources (“Section 117 Transaction”) to the U.S. Department of Education (“Department”). University departments involved in a Section 117 Transaction must report these transactions semi-annually to the University Internal Audit and Compliance Office as described in this policy.

(B) Purpose of policy

To ensure compliance with Section 117 of the Higher Education Act.

(C) Scope

Each department at the University of Toledo is responsible for identifying and reporting gifts received from any foreign source, contracts with any foreign entity and any ownership interest in, or control over the higher education institution by any foreign entity. The department will ensure that all the required information to complete the Higher Education Act Section 117 report is recorded and submitted to the University Internal Audit and Compliance Office on a semi-annual basis. The Vice President of the applicable department’s division will serve as the

“signing authority” in attesting to the gifts and contracts reported from foreign sources. All signing authorities accepting contracts and/or gifts are expected to do so completely and in a timely manner. The Executive Director of Internal Audit and Chief Compliance Officer will be responsible for the semiannual reporting of these gifts and contracts.

Each department should retain the following information in the event there is a need to produce additional information later: department/individual recipient, Principal Investigator name/contact, agreement number, sponsor name, sponsor address, subject title.

Since the aggregate threshold of \$250,000 may be triggered by a combination of gifts or contracts from a single foreign source, and that such gifts or contracts (or information about those transactions) may be administered in a number of departments within the University, the Internal Audit and Compliance Office's (b) (i)-2 (o)-2 (o)-2g-2 (a) (v)2 (ie)-4 (w) Tc 00ld-nc)4 ((h)-14 (e) )

