



## Foreign Gifts and Contracts Disclosure Policy

---

<b>Effective:</b>	November 1, 2021
<b>Responsible Executives:</b>	Vice President for Research and Economic Development Vice President for Business and Finance and Chief Financial Officer
<b>Applicability:</b>	All University colleges, offices, and units
<b>Review By:</b>	November 1, 2023

---

### I. POLICY STATEMENT AND SCOPE

Auburn University is committed to complying with federal law regarding the reporting of certain gifts and contracts involving foreign sources to the United States Department of Education.

Section 117 of the Higher Education Act (20 U.S.C. § 1011f) (“Section 117”) requires institutions of higher education to disclose, on a semi-annual basis, gifts from and contracts with a foreign source that, alone or in combination with other gifts and contracts from that foreign source, equal or exceed the then-current statutory threshold in a given calendar year.

Auburn University must disclose gifts and contracts involving foreign sources in the manner required by Section 117 and other applicable authorities.

Gifts and contracts covered by this policy typically involve funding, property, services, or other in-kind value provided by a foreign source to the University. A contract involving transfer of funds from the University to a foreign source typically is not subject to disclosure.

### II. PROCEDURES

The Responsible Executives for this policy shall jointly adopt, maintain, and implement appropriate procedures, workflows, and protocols for gathering documents and information subject to Section 117 and for disclosing information to the United States Department of Education at the times and in the manner required by law.

All Auburn University colleges, offices, and other units must cooperate with the Responsible Executives and their designees in reviewing and collecting records covered by Section 117 and related information.