



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible Office:** Financial Reporting,  
Office of the Comptroller

Last Amended Date: October 25, 2016

### **Required Information for reporting Foreign Gifts and Contracts**

*Use the following guidelines to provide specific information for **each** foreign gift and contract received by The George Washington University*

**Background and purpose:** Institutions participating in the Title IV student assistance programs must report disclosure information to the Secretary of the Department of Education about gifts received from any foreign source, contracts with a foreign entity, and any ownership interests in or control over the institution by a foreign entity valued at \$250,000 or more. A gift or contract meets the \$250,000 threshold either alone or when considered in combination with all other gifts from or contracts with that foreign source within a calendar year.

**Guidelines:** In order for University to comply with the HEA reporting deadline, gifts and contracts across the university must be aggregated properly to evaluate whether the reporting threshold has been met. Accordingly, departments, offices, schools or other units receiving gifts of any dollar value from a foreign source promptly must report such gifts to the Office of the Vice President for Development and Alumni Relations at (202) 994-6415 in accordance with the [Gift Processing Policy](#), and promptly must report all contracts of any dollar value with foreign sources to Financial Reporting in the Office of the Comptroller at (571) 553-4166. In consultation with the Development Division and other appropriate University offices, Financial Reporting will prepare and submit all foreign source gift and contract disclosure reports to FSA.

1. For gifts received from or contracts entered into with a foreign source *other than a foreign government*. Provide the aggregate dollar amount of all gifts and contracts attributable to each particular country. [NOTE: The country to which a gift is “attributable” is the country of citizenship if the giver is a natural person, or the country of incorporation if the giver is a legal entity. If the person’s country of citizenship is unknown, use their country of principal residence. If the legal entity’s country of incorporation is unknown, use the country that is its principal place of business.]

For any gifts or contracts that are *restricted or conditional* as defined in the Foreign Gifts and Contracts Disclosure Policy (located at [GW University Policies](#)) also provide the following for each such gift or contract: a) The amount; b) the date; c) a description of such conditions or restrictions; and d) the country to which each restricted or conditional gift or contract is attributable as set forth in the preceding paragraph.

2. For gifts received from or contracts entered into with a *foreign government*. Provide the aggregate dollar amount of all gifts and contracts received from each foreign government. For any gifts or contracts that are *restricted or conditional* as defined in the Foreign Gifts and Contracts Disclosure Policy (located at [GW University Policies](#)) also provide the following for each such gift or contract: a) The amount; b) the date; c) a description of such conditions or restrictions; and d) the name of the foreign government to which each restricted gift or contract is attributable.