

How to Query Data for Foreign Financial Disclosure Reports (FFDR)

1. Many transactions and occurrences across the institution can fall within any of these definitions of “gift” and “contract”.
 - “Gift” – Any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, license, special access, equipment time, samples, research data, or other item having monetary value. This also includes services as well as gifts of training, transportation, local travel, lodging, meals, research hours, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has occurred. By definition, a gift is given without expectation of anything in return.
 - “Contract” – A source of financial support that does not fall under the definition of a gift for the purposes of the FFDR.
2. Of these transactions though, which originated from or were agreed upon with a “foreign source”?
 - A “foreign source” is defined as:
 - A foreign government, including an agency of a foreign government;
 - A legal entity, governmental or otherwise, created solely under the laws of a foreign state or states;
 - An individual who is not a citizen or national of the United States or a trust territory or protectorate thereof; AND/OR
 - An agent, including a subsidiary or affiliate of a foreign legal entity, acting on behalf of a foreign source.
3. Once you have a list of gifts from/contracts with a “foreign source”, you need to determine each foreign source’s country of attribution.
 - For gifts received from or contracts with a foreign government or agent acting on behalf of a foreign government, the country to which the gift/contract is attributable is the country of the foreign government.
 - For gifts received from or contracts with a “foreign source” other than a foreign government or agent acting on behalf of a foreign government, the country to which the gift/contract is attributable is the country of citizenship, or if unknown, the principle residence for a foreign source who is a natural person, and the country of incorporation, or if unknown, the principal place of business for a foreign source which is a legal entity.
4. Next, narrow down your list even further to those gifts/contracts with “foreign sources” who are associated with **China, North Korea, Russia or Iran**. The internal value threshold for FFDR is \$0. Please report any and all transactions with “foreign sources” associated with these countries, regardless of the value.
5. Congratulations! You may need to do further research per transaction to have all data elements necessary for Qualtrics submission; however, this should provide you with an initial list of reportable transactions.