Wisconsin Partnership Program
Policy on Making a Determination on Supplanting/Non-supplanting

BACKGROUND
The Insurance Commissioner’s Order (Order) includes a prohibition of using the Wisconsin Partnership Program (WPP) funds “to supplant funds or resources that are available from other sources.” This non-supplanting provision remains a key requirement of the WPP and its grant recipients (Figure 1). A monitoring system has been developed to make sure these funds are not used to replace existing funds, whether at the level of the University of Wisconsin School of Medicine and Public Health (SMPH), the University of Wisconsin or of an individual grant recipient.

To ensure compliance at the University and the UW School of Medicine and Public Health (SMPH), annual written non-supplanting attestations are required of the Vice Chancellor for Finance and Administration of UW-Madison, the Dean of the SMPH and the Chief Financial Officer (CFO) of the SMPH. These statements are filed with the Executive Director and Corporate Secretary of the UW System Board of Regents. Individual grant recipients are required to complete questionnaires when applying for funds, immediately after an award is made and with each annual progress report, as well as attest to non-supplanting as part of their financial reimbursement reports.

The WPP under the direction of the Finance Associate Director monitors the effectiveness of the policies on an ongoing basis and will continue to revise these policies as needed to ensure compliance.

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<tr>
<th>Figure 1: Overview of WPP Non-supplanting Policy</th>
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<tbody>
<tr>
<td>1. <strong>Individual applicants:</strong> Non-supplanting Questionnaire completed by applicant. Other Support Page (NIH format) for research awards, review of grant applications/awards in University databases.</td>
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<td>2. <strong>Individual grant recipients:</strong></td>
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<td>a. Grant recipient certification on Financial Reimbursement Reports (FRR) (Community grants only)</td>
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<td>b. Grant recipient annual completion of Non-supplanting Questionnaire</td>
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<td>3. <strong>UW School of Medicine and Public Health (SMPH):</strong></td>
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<tr>
<td>a. Annual attestation by SMPH CFO (PERC/OAC)</td>
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<td>b. Annual attestation by SMPH Dean</td>
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<tr>
<td>4. <strong>UW-Madison:</strong> Annual attestation by UW-Madison Vice Chancellor for Finance and Administration</td>
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<td>5. <strong>UW System:</strong> Annual attestations filed with UW System Board of Regents</td>
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PROCESS FOR MAKING A DETERMINATION ON SUPPLANTING

**UW-Madison and UW System**
The UW-Madison Vice Chancellor for Finance and Administration will monitor on an ongoing basis the UW-Madison’s budget allocation to the SMPH to ensure that the UW-Madison and UW System are in compliance with the supplanting prohibition in the Order. The Vice Chancellor will also annually attest that the UW-Madison and the UW System have complied with the supplanting prohibition in the Order. This attestation will be part of the annual report prepared by the SMPH in accordance with the Insurance Commissioner’s Order.

**UW School of Medicine and Public Health**
The SMPH Dean, in consultation with the SMPH CFO, will annually attest that the SMPH has complied with the supplanting prohibition in the Insurance Commissioner’s Order and has made such a determination.

Effective 4/1/2023
for each proposal approved and for each program funded. This attestation will be part of the annual report prepared by the SMPH in accordance with the Insurance Commissioner’s Order.

The SMPH CFO will annually attest that the OAC and PERC have complied with the supplanting prohibition in the Insurance Commissioner’s Order and that the SMPH CFO on behalf of the committees has made such a determination for each proposal approved and for each project funded. This attestation will be part of the annual report prepared by the SMPH in accordance with the Insurance Commissioner’s Order.

During the preparation of the annual report, the WPP Finance Associate Director, the SMPH CFO, WPP Administrative Director and the WPP Executive Director will consult with Legal Affairs and Internal Audit, if necessary, to ensure compliance with the required elements of the annual report as specified in the Insurance Commissioner’s Order.

Individual Grant Recipients

Application Stage (Prior to Project Start Date)
Each external and internal applicant requesting funds either for the public health initiatives (35 percent) or the education or research initiatives (65 percent), as specified in the addendum of the WPP 2004-2009 Five-Year Plan, must answer the questions in the non-supplanting questionnaire. The questionnaire is part of the application process and serves as a basis for making a determination of non-supplanting. An authorizing signature is required by the applicants attesting that supplanting will not occur if an award is made.

It is the responsibility of the applicant to fully disclose any potential or actual overlap between the aims, activities, or scope of work in WPP proposal with the aims, activities or scope of work supported by other funding sources to the applicant.

All applications are initially reviewed to determine if the applicant has been awarded funds for a similar or the same project from other sources. Once the Oversight and Advisory Committee (OAC) and/or the Partnership Research and Research Committee (PERC) votes to fund an application, a final review of supplanting is performed.

The WPP Administrative Leadership Team (Executive Director, Administrative Director and Associate Directors for Finance and Operations) will make a determination regarding supplanting. If a determination is made that supplanting has occurred or likely will occur, the SMPH CFO will be consulted, and the Leadership Team will take action. The Administrative Leadership Team’s decisions are final and cannot be appealed.

If an award is made to an applicant who has an application for a similar topic pending from an external source, WPP staff will maintain regular contact with the applicant and monitor the University databases to determine if the applicant is successful in receiving funding for the same or similar topic. If successful, the applicant will be asked to furnish information to ensure that the external funding does not supplant WPP funding. WPP staff will consult with the Administrative Leadership Team before a final determination is made.

Awardee Stage (Post-Award)

It is the responsibility of the grant recipient to fully disclose any potential or actual overlap between the aims, activities, or scope of work in WPP grant with the aims, activities or scope of work supported
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by other funding sources. Grant recipients must notify the WPP immediately if they receive funding from another source for the funded project.

As an ongoing check against supplanting, all grant recipients will be asked to periodically recertify that supplanting has not occurred. Recertification will occur on a regular basis at the time of submission of the annual progress report, and for public health grants, it will also occur at the time of submission of financial reimbursement reports. The Finance Associate Director will review the reports as well as other potential resources. If there is evidence of supplanting, the WPP Administrative Leadership Team and the SMPH CFO will make a final determination. The WPP Executive Director will notify the OAC and/or the PERC, as appropriate, and the project will be halted immediately.