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 of all its grantees (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 fiscal attestations are required of the Vice Chancellor for Finance and Administration of UW-Madison, the Dean of the SMPH and the Senior Associate Dean for Finance 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 and with each annual progress report, as well as attest to non-supplanting as part of their financial status reports.

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

Figure 1: Overview of WPP Non-supplanting Policy

1. Individual applicants: Questionnaire completed by applicant
2. Individual grant recipients:
   a. Grantee certification on Financial Status Reports (FSR)
   b. Grantee annual completion of Questionnaire
3. UW School of Medicine and Public Health (SMPH):
   a. Annual attestation by SMPH Senior Associate Dean for Finance
   b. Annual attestation by SMPH Dean
4. UW-Madison: Annual attestation by UW-Madison Vice Chancellor for Finance and Administration
5. UW System: Annual attestations filed with UW System Board of Regents

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 Senior Associate Dean for Finance, will annually attest that the SMPH has complied with the supplanting prohibition in the Insurance Commissioner’s Order and has made such a determination 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.

Revised 1/1/2020
During the preparation of the annual report, the Senior Associate Dean for Finance and the WPP 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**
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.

All applications are initially reviewed to determine if the applicant has been awarded funds for a similar or the same project from other sources. For education and research projects, this includes a review of University databases on grant applications and awards. Based on the questionnaire included in the application as well as a review of other potential resources, the WPP Assistant Director for Finance, in consultation with the Senior Associate Dean for Finance and the Director, will make a determination that supplanting will not occur if an award is made or will request additional information from the applicant. The Senior Associate Dean for Finance will inform the Oversight and Advisory Committee (OAC) or the Partnership Education and Research Committee (PERC), as appropriate, of his determination. If the Senior Associate Dean for Finance determines that supplanting has occurred or likely will occur, no award can be made by the OAC or PERC. If an award is made to an applicant who has an application for a similar topic pending from an external source, the Assistant Director for Finance 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 overlap. The Assistant Director for Finance will consult with the Senior Associate Dean for Finance and the Director before a final determination is made.

If there is an irresolvable difference of opinion between the applicant and the Senior Associate Dean for Finance, who has determined that supplanting has occurred or will likely occur, the Senior Associate Dean for Finance will request the UW-Madison Office of Legal Affairs and/or Internal Audit to conduct an independent review of the circumstances. If the decision of the independent reviewer concurs with the Senior Associate Dean for Finance, the award will not be made. If the decision of the independent reviewer is in disagreement with the Senior Associate Dean for Finance, the SMPH Dean will be notified, and absent any additional information, the award will be made.

As an ongoing check against supplanting, all grant recipients will be asked to periodically recertify that supplanting has not occurred. Additionally, they will be required to notify the Assistant Director for Finance if they have received funding from another source for the funded project or have declined additional funding for the project. 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 status reports. The Assistant Director for Finance will review the reports as well as other potential resources and University databases, and make a determination, in consultation with the Senior Associate Dean and the Director, that there is no evidence of supplanting. If there is any subsequent evidence of supplanting, the Senior Associate Dean for Finance will notify the OAC or the PERC, as appropriate, and the project will be halted immediately. Legal Affairs and/or Internal Audit will be asked to conduct an independent review of the circumstances and make a final determination. If evidence of supplanting is
confirmed and with the concurrence of Legal Affairs, the grantee will face suspension of future funds under this program and steps will be taken to recover money provided from the grant.

The Senior Associate Dean for Finance will annually attest that the OAC and PERC have complied with the supplanting prohibition in the Insurance Commissioner’s Order and that the Senior Associate Dean for Finance 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.