



Sarah Ebben
Policy Analyst

Madison, WI 53715

(248) 978-3376

sebben@uwsa.edu <http://www.wisconsin.edu>

April 11, 2025

Below, please find a listing of all new and revised UW System Administrative policies approved between March 7 and April 11, 2025. There was one (1) revised UW System Administrative Policy and one (1) new UW System Administrative Policy.

I. Revised UW System Administrative Policy

- *SYS 1293, Mandatory Employee Training (Approved March 11, 2025)*
 - Summary of Policy and Policy Revisions
 - This policy sets out the mandatory training requirements, the employees to whom the training applies, the frequency with which training must be undertaken, and the responsibilities of those involved.
 - This update moves “FERPA Training” from a one-time training, required only if an employee’s position grants them “access to student records”, to a training required for all employees every 3 years. This update recognizes that practically all employees of the UWS have access to information that could constitute “student records” under the definition of the term in FERPA.
 - In Section 5, the definition of “FERPA” was updated to include that FERPA training is provided by UW System.
 - In Section 6.A.I.2, subsection d was added, which establishes that FERPA training will be included in the mandatory training for new hires.
 - In Section 6.A.II, subsection 3 was added, which establishes that FERPA training will be required as part of the mandatory recurring training every 3 years for existing hires.
 - In Section 6.A.III, subsection 1 was removed, as FERPA training will be required for all employees and is no longer role dependent.
 - University Comments and Concerns
 - See the SYS 1293 University Comments and Concerns page for a summary of the feedback received and responses.

II. New UW System Administrative Policy

- *SYS 641, Prohibition on Participation in Malign Foreign Talent Recruitment Programs (Approved April 1, 2025)*
 - Summary of Policy
 - This new policy is responsive to a requirement in the CHIPS and Science Act that individuals seeking federal grants report their participation in Foreign Talent Recruitment Programs and not participate in Malign Foreign Talent Recruitment Programs. Specific provisions include:
 - Covered individuals must comply with all sponsor policies and certifications regarding malign foreign talent recruitment programs, and provide true, complete, and accurate disclosures.
 - All employees must affirm in their up-to-date Outside Activities Report that they do not participate in a malign foreign talent recruitment program and that they are aware of their obligations to report such participation to their research sponsor agency. In addition, they

must affirm non-participation annually.

- University Comments and Concerns
 - While no formal comments were left through the website about this policy, there was external feedback from UW-Milwaukee, stemming from their internal policy on malign foreign talent recruitment programs. Concerns were related to language, definitions, and processes that did not align with what is required from the CHIPS Act. Upon a formal meeting and review of the draft policy, the following suggestions were made and incorporated:
 - Updated language in Section 1 (Policy Purpose) to state all UW employees are subject to this policy, with the exception of UW-Madison, to align with language in Section 6 (Policy Statement).
 - Updated language in Section 3 (Scope and Institutional Responsibilities) to state that individual institutions may develop and implement institutional policies with additional requirements, but that the minimum requirements of the system-level policy must be met.
 - Updated language in Subsection 6.C to state that the requirement of completing an outside activities report (OAR) is governed by Wis. Admin. Code UWS 8.
 - Added Subsection 6.D to state the purpose of an institutional Authorized Organizational Representative (AOR) and their duties regarding outside activities reports (OARs) and malign foreign talent recruitment programs (MFTRPs).

III. Policies in the Final Stages of Revision

- *SYS 1xx, Institutional Statements*
- *SYS 216, Academic Basis Pay Deferral Policy*
- *SYS 1275, Recruitment Policies*
- *SYS 1290 Guidance: (Code of Ethics) Guidelines for Reporting Outside Activities Under UWS 8.025*
- *SYS 1315, Patents and Inventions*