

UConn HEALTH

POLICY NUMBER 2006-15

November 8, 2016

**POLICY: APPLICABLE CREDITS/SPONSORED PROGRAMS
(RESEARCH/SPONSORED PROGRAMS)**

PURPOSE:

To ensure that all agreements with external providers of products or services that support sponsored program activities are managed in accordance with all federal and state regulations concerning the handling of applicable credits.

SCOPE:

This policy applies to any employee of the institution that negotiates with external providers of products or services for sponsored program activities.

DEFINITIONS:

Applicable Credits

The term ‘applicable credits’ refers to those receipts or negative expenditures that operate to offset or reduce direct or F&A cost items. Typical examples of such transactions are: “purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges.”¹

Accrued Applicable Credits

The accumulating of applicable credits as defined above for use on subsequent product or service acquisitions.

POLICY STATEMENT:

An agreement with an external provider of products or services that reduces the quoted price of the product or service must be disclosed to Sponsored Program Services, if the credit is not used on the matching invoice. The accrued applicable credit must be accounted for in accordance with UConn Health procedures. Such accrued reductions in price are considered applicable credits as defined above. All accrued applicable credits must be exercised or applied in accordance with UConn Health procedures.

Failure to disclose an agreement that contains accrued applicable credits as defined above is a conflict of interest and the responsible person may be subject to sanctions as defined in the UConn Health Policy [2006-01 Individual Financial Conflicts of Interest in Research](#).

¹ U.S. Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”). 2 CFR §200.406 – Applicable Credits.

Jeffrey Seemann (Signed)

3/6/17

Jeffrey Seemann, PhD
Vice President of Research

Date

Andrew Agwunobi (Signed)

3/9/17

Andrew Agwunobi, M.D., M.B.A.
CEO, Executive Vice President for Health Affairs

Date

New Policy: 8/11/06
Revised: 11/8/16

[Policy 2006-01: Individual Financial Conflict of Interest in Research](#)
[Policy 2009-03: Institutional Conflicts of Interest in Research](#)