Policy 3220
Purchases of Restricted Items

<table>
<thead>
<tr>
<th>Responsible Office</th>
<th>Procurement</th>
<th>Effective Date</th>
<th>Last Revision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsible Official</td>
<td>Chief Procurement Officer</td>
<td>9/15/99</td>
<td>8/20/13</td>
</tr>
</tbody>
</table>

Policy Sections

- 3220.1 Hazardous Materials .................................................. 2
- 3220.2 Safety-Critical Equipment ............................................. 2
- 3220.3 Radioactive Materials ................................................... 3
- 3220.4 Animals ........................................................................ 3
- 3220.5 Controlled Substances in Research ................................... 3
- 3220.6 Non-Taxable Ethyl Alcohol .............................................. 3

Scope
This policy defines restricted items and the guidelines that must be followed for such purchases.

Policy Statement
In the course of their work, University employees, staff, and students routinely use a variety of potentially hazardous materials, safety-critical equipment, radioactive materials, vertebrate animals, and controlled substances in research. The University permits these uses, but only with oversight to ensure safety and compliance with relevant restrictions and regulatory requirements. In addition to the rules governing University procurement as defined in Policy 3201 General Purchasing Policy, the purchase of these items therefore involves special rules. University personnel are responsible for following the appropriate procedures defined by this policy.

Due to their critical nature, restricted items may only be ordered through SciQuest or the Purchasing Department. University purchasing cards, personal credit cards, checks, or cash may not be used to order any of these items.

Definitions
Items subject to special safety or other regulatory requirements, whose purchase and handling are subject to special procedures. For the purpose of this policy, restricted items include certain highly hazardous materials, safety-critical equipment, radioactive materials, vertebrate animals, controlled substances (i.e., scheduled drugs and certain drug precursors), non-taxable ethyl alcohol and select agents, as defined below.

Animals
Any live, vertebrate animal used or intended for use in research, research training, experimentation, biological testing or for related purposes. Examples include, but are not limited to, traditional laboratory animals, farm animals, wildlife, birds and aquatic species.

Controlled Substances in Research
Controlled substances covered by this policy are substances used in research that are listed by the U.S. Department of Justice, Drug Enforcement Administration (DEA) and/or the Connecticut Department of Consumer Protection, Drug Control Division (i.e., scheduled drugs and certain drug precursors).

Hazardous Materials
Materials that present special safety risks during transport, storage, use, or disposal. These include, but are not limited to, certain highly toxic, reactive, or otherwise hazardous chemicals, gases, and biological agents.

Non-Taxable Ethyl Alcohol
Non-taxable high-proof ethyl alcohol is regulated by the federal Bureau of Alcohol, Tobacco, and Firearms.

Radioactive Materials
By-product, source, special nuclear, accelerator produced, Generally Licensed, or naturally occurring material whose purchase and use is licensed by the US Nuclear Regulatory Commission (NRC) and/or the CT Department of Energy and Environmental Protection (DEEP). These radionuclides may emit alpha, beta, gamma, or Xrays,
neutrons or other emissions. Examples of radioisotopes include, but are not limited to, P-32, P-33, S-35, C-14, H-3, and I-125, including sources sold by vendors as “exempt”.

**Safety-Critical Equipment**
Equipment that can present safety hazards to users (e.g., X-ray and laser equipment) as well as equipment used to control exposures to recognized hazards, and whose improper use could subject users to harm (e.g., fume hoods, biological safety cabinets, respirators).

---

**Reason for the Policy**
This policy is intended to ensure that individuals and departments needing restricted items at the University have the capability to acquire them in compliance with applicable University, state and federal requirements.

**Policy Sections**
University employees, staff, and students routinely use a variety of potentially hazardous materials in their work. Safe management of these materials is promoted through training and education programs and periodic safety inspections. However, a small subset of these materials requires greater scrutiny for regulatory and safety purposes. To ensure that this oversight is consistently provided without unreasonably interfering with operations and research, the University requires all individuals and departments with a legitimate need to purchase restricted items to do so in accordance with these procurement procedures. If a purchase request is denied, the decision may be appealed through the University Safety Committee, Radiation Safety Committee, Biological Safety Committee, Chemical and Laboratory Safety Committee, or the Yale Institutional Animal Care and Use Committee (IACUC) as appropriate.

3220.1 Hazardous Materials
Items considered hazardous materials under this section can pose serious risks of injury or exposure, or require authorization for use prior to acquisition, and therefore may only be ordered and used by groups whose facility, safety equipment, and training so prepare them. Purchases of these items must be made through SciQuest, to facilitate order tracking and approval. Examples of hazardous materials requiring pre-order approval include: highly reactive/pyrophoric compounds, toxic compressed gases, highly toxic chemicals, DHS-regulated chemicals, select agents as defined by CDC/USDA, other human pathogens, defective pathogen vectors and vector kits used for research experiments involving recombinant and synthetic nucleic acid molecules, and other high hazard compounds. As these lists periodically change, please consult the following links for the most current information:

Restricted Chemicals – [http://ehs.yale.edu/forms-tools/chemicals-requiring-ehs-pre-approval](http://ehs.yale.edu/forms-tools/chemicals-requiring-ehs-pre-approval)

3220.2 Safety-Critical Equipment
Purchases of items considered safety-critical equipment under this section must be made through SciQuest or with EHS approval. Many of these items require ongoing maintenance, testing, specialized training, and certification. It is the responsibility of the owner department to ensure that these requirements are fulfilled. Safety critical equipment requiring pre-order approval are listed below:

<table>
<thead>
<tr>
<th>Safety Critical Equipment Requiring Pre-Order Review/Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autoclaves</td>
</tr>
<tr>
<td>Automated external defibrillation (AED) devices</td>
</tr>
<tr>
<td>Automated film processors</td>
</tr>
<tr>
<td>Biological safety cabinets</td>
</tr>
<tr>
<td>Clean benches (horizontal or vertical laminar flow)</td>
</tr>
<tr>
<td>Compressed Gas lecture bottles</td>
</tr>
<tr>
<td>Compressed Gas manifold delivery systems</td>
</tr>
<tr>
<td>Cranes and hoists</td>
</tr>
<tr>
<td>Electron microscopes</td>
</tr>
<tr>
<td>Emergency eye washes and safety showers</td>
</tr>
<tr>
<td>Ethylene oxide sterilizers</td>
</tr>
<tr>
<td>Forklifts and related motorized equipment</td>
</tr>
</tbody>
</table>
3220.3 Radioactive Materials
The University's US NRC Licenses and CT DEEP Registrations permit the procurement, use, storage and disposal of radioactive materials and radioactive sources for basic science and biomedical research, testing, calibration and educational purposes. Purchase and use are subject to oversight by the Yale University Radiation Safety Committee (RSC). RSC policies require that only authorized and trained persons may acquire radioactive materials, radioactive sources and x-ray generating equipment. All receipts of such materials or items must be coordinated through the Radiation Safety Section (RSS) of Environmental Health and Safety. Further, some radioactive materials and sources may be subject to incoming survey and security requirements and thus are only delivered to designated receiving locations. After an incoming package survey, delivery of the RAM to authorized laboratories is arranged through the RSS. Purchases of radioactive materials must be made through Sciquest.

3220.4 Animals
The University permits the use of vertebrate animals in animal-related research, testing or training, but the purchase and use of animals is subject to approval and oversight under rules defined by the Yale Institutional Animal Care and Use Committee (IACUC) and the Director, Yale Animal Resources Center (YARC). These rules require that the YARC Procurement Office must process any order for vertebrate animals to be received on or off the Yale campus or used in University activities. All requisitions require a valid protocol number from IACUC. Requests for the purchase of animals may be made via telephone, fax, or by the completion of the Form 3220 FR.03 Animal Requisition.

3220.5 Controlled Substances in Research
Due to their potential for misuse and abuse, items listed by the US Department of Justice, Drug Enforcement Administration (DEA) and/or the Connecticut Department of Consumer Protection, Drug Control Division (DCD), as Schedule I to IV drugs are subject to special procurement, storage, use, and disposal requirements. These include federal and state licensing (prior to procurement), maintaining detailed storage and use records, and special disposal procedures.

Since the University cannot, by law, maintain a “blanket” registration for controlled substances, it is the responsibility of individual researchers and other staff using these materials to obtain appropriate registrations and licenses. EHS facilitates the processing of State/Federal controlled substance licensing/registrations for individual Yale researchers. Requests for new or renewal registrations and licenses must be submitted to EHS for processing.

Purchases of controlled substances for research use must be made through SciQuest.

3220.6 Non-Taxable Ethyl Alcohol
The University must maintain records, and report all purchases of, non-taxable, high-proof ethyl alcohol. Contract orders for non-taxable ethyl alcohol are managed by the Purchasing Department. The Department of Traffic, Receiving and Stores maintains a supply of this alcohol for research use at the University and keeps records of use and reorder. To request alcohol from this stock, University users and departmental stockrooms must complete a Stock Requisition form.

Special Situations/Exceptions
The policies governing the purchase of restricted materials are designed to meet regulatory compliance requirements and ensure the health and safety of the University community. Requests for exceptions, variances, or modifications to these policies should be directed, in writing, to the Purchasing Department and Yale Environmental Health and Safety or the Yale Institutional Animal Care and Use Committee, as appropriate. Any appeals to the decisions should be brought to the attention of the appropriate University committee (as listed in Policy Section above). Questions regarding interpretation of this policy should be directed to the Associate Director of Purchasing.

Related Information
Policy 3201 General Purchasing Policy
Guide 3220 GD.01 3220GD.01 Restricted Items Requiring Pre-Order Approval
Contacts

<table>
<thead>
<tr>
<th>Subject</th>
<th>Contact</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interpretation of policy</td>
<td>Associate Director of Purchasing</td>
<td>432-9982</td>
<td><a href="mailto:purchasing.helpdesk@yale.edu">purchasing.helpdesk@yale.edu</a></td>
</tr>
<tr>
<td>Environmental Health &amp; Safety</td>
<td>Director of EHS</td>
<td>785-3550</td>
<td><a href="mailto:ehs@yale.edu">ehs@yale.edu</a></td>
</tr>
<tr>
<td>Traffic Receiving and Stores</td>
<td>Manager</td>
<td>764-9308</td>
<td><a href="mailto:gerald.apuzzo@yale.edu">gerald.apuzzo@yale.edu</a></td>
</tr>
<tr>
<td>Yale Animal Resource Center</td>
<td>Business Administrator</td>
<td>785-2526</td>
<td><a href="mailto:animal.order@yale.edu">animal.order@yale.edu</a></td>
</tr>
</tbody>
</table>

Roles and Responsibilities

**Environmental Health and Safety**
Establishes procurement and handling guidelines regarding hazardous materials, safety-critical equipment, radioactive materials, and use of controlled substances in research laboratories at the University.

**Department of Traffic, Receiving and Stores**
Maintains stocks of non-taxable ethyl alcohol and records of their use at the University.

**Requisitioner**
Prepares and submits required documents and obtains approvals necessary for compliance.

**Purchasing Department**
Purchases restricted items on requisitions from authorized University personnel or departments in accordance with the guidelines and restrictions discussed in this policy. Establishes contract orders with vendors for the purchase of non-taxable ethyl alcohol.

**Yale Animal Resources Center**
Oversees the purchase, handling, husbandry, and health care of vertebrate animals used in research, testing, or training at the University.

Revision History

Policy first issued on 9/15/99. revised 11/5/03, 10/9/07, 8/20/13.

The official version of this information will only be maintained in an on-line web format. Any and all printed copies of this material are dated as of the print date. Please make certain to review the material on-line prior to placing reliance on a dated printed version.