Sponsored Research – Managing Compliance and Maximizing Revenues

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PBU Overview

- **Primary focus of tax regulations – "special legal entitlement"**
  - Physical rights to use bond financed space
  - Direct use of bond financed space, e.g., lease or management contract
- **Sponsored research is different –**
  - Generally, no physical rights to use property or occupy property

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How To Think About Research

- We believe proper focus is on "output" derived/related to bond financed property ("Nexus")
  - data, I/P, license, copyright etc.
- Only specific guidance is Rev Proc 2007-47 for "basic research"
- Given lack of IRS guidance, difficult to draw bright line tests or rules in instances not involving basic research

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Tufts Long-Term Debt View

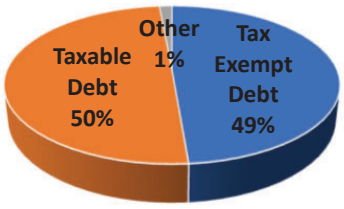
Debt Profile (06/30/18):

- **Aa2 (Moody's), AA-/A-1+ (S&P)**
- **T/E Debt $371M (9 Outstanding Issues)**
- **Taxable Debt $380M ($250M Century Bond & 1 other Outstanding Issue)**
- **Other L/T Debt $ 11M**

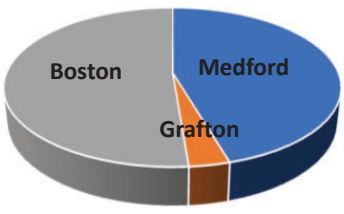
278 Buildings (Owned) 5.6M GSF

146 Currently financed with T/E Debt

FY18 Debt View



T/E Debt $ - Funded Projects (By Campus)



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