

## **UNM CEEO & HSC Compliance Office Newsletter** **November 5, 2023**

---

### **In uncertain times, UNM has ethics as its guide**

by Francie Cordova, Chief Compliance Officer

At the University of New Mexico, we're proud that our guiding principles include a focus on academic excellence, accountability, integrity, respect and a profound commitment to the diverse local and national cultures that make up our campus community. During the week of Nov. 5, UNM will be joining hundreds of organizations to celebrate Corporate Compliance and Ethics Week, established in 2005 to shine a spotlight on the importance of these two pillars of our institutional integrity.

Compliance partners across the university will feature online speakers, creative online training and a virtual focus on the principles that guide ethical behavior and decisions at our institution. We may be doing this in a very different way due after the COVID-19 pandemic, but the goal remains the same: to reinforce UNM's commitment to compliance and ethics.

At UNM, Ethics Awareness Week is an extension of a comprehensive Ethics and Compliance Program and is a part of our sustained efforts to promote ethical values and professionalism within the university. It is also an optimal opportunity to educate our university community and the greater public, and get all of us thinking together about new ways to incorporate ethical behavior into campus culture. An ethics and compliance program is a powerful tool for reducing pressure to compromise standards and observations of misconduct; increasing employee reporting of observations that occur; and decreasing retaliation against whistleblowers.

This program includes a system-level Ethics Policy and Code of Conduct, on-board ethics training, periodic ethics refresher training, compliance audits, research reviews,



financial audits and an Ethics and Compliance Reporting Hotline where internal and external stakeholders can report unethical behavior or misconduct.

### **Why does this matter?**

It's more than just the right thing to do; according to the Association of Certified Fraud Examiners (ACFE) 2020 Report to the Nations, which is conducted every two years. Organizations that have an employee code of conduct experienced 51% less costly losses from fraud. Meanwhile, organizations with an ethics and compliance reporting hotline saw their fraud losses cut nearly in half when compared with organizations without a hotline. In essence, when a company commits resources to ethics, it makes a difference. Fewer employees feel pressured to break the rules, and fewer misdeeds take place. When bad behavior does happen, employees tell management so the problem can be addressed internally.

UNM President Garnett Stokes has made her commitment to compliance a part of our collective effort to raise the bar for ethical behavior and decision-making. By having a designated week, UNM compliance and ethics professionals can build a greater awareness in ways that reinforce not just specific rules and regulations, but the overall culture of compliance. In the midst of uncertainty in our nation, let's celebrate the principles that guide ethical behavior and decisions. It is, after all, the right thing to do.

## **ACE Awards 2023**

by Francie Cordova and Angela Vigil, Health and Health System Compliance Officer

The ACE (Advancing Compliance and Ethics) award is presented to individuals who enhance and promote a healthy, ethical, and compliant working and learning environment at UNM. The Compliance, Ethics & Equal Opportunity Office and the UNM Health and Health Sciences Compliance Office annually recognize individuals across the UNM enterprise who dedicate their work to Advancing Compliance and Ethics and creating a better UNM. The recipients will be celebrated on Tuesday, Nov. 7 from 4 to 6 p.m. at the University Club located at 1923 Las Lomas, NE. Please join us in congratulating the recipients.

The ACE 2023 recipients are:

### **Victor Griego – Director, Internal Audit**

As the Director of UNM's Internal Audit Department, Victor Griego is at the cornerstone of UNM's commitment to ethical and compliant behavior. A native New Mexican from Mora, Griego joined UNM in 2012 as an internal auditor. In 2021, Victor was named Director of Internal Audit following a nationwide search. In his current role, Victor is involved in all audits conducted by his office and advises University administrators, including the President and Regents, on best practices and audit results.

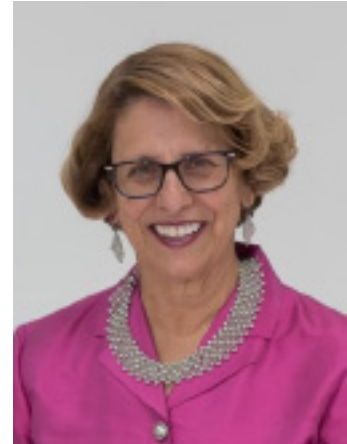


When not hard at work in his own department, Victor collaborates with other UNM compliance partners to conduct risk assessment and joint investigations and provides guidance and support in policy and operational development to UNM stakeholders. He also co-administers the UNM Compliance Hotline.

Victor is always quick to smile and brings a positive and transparent work approach to the internal audit role.

### **Carolyn Montoya, Interim Dean – School of Nursing**

Carolyn Jaramillo Montoya, PhD, RN, CPNP, FAAN, FAANP, clinician educator - professor, is the Interim Dean at The University of New Mexico (UNM) College of Nursing. Dr. Montoya served as president of the New Mexico Nurse Practitioner Council, where she worked to achieve successful passage of legislation resulting in full prescriptive authority and independent practice for nurse practitioners in New Mexico. She has also served as president of the American College of Nurse Practitioners, advocating for full-scope practice for all states, and president of the National Association of Pediatric Nurse Practitioners, where she advocated for improving the health of children and families. The field of compliance and ethics in healthcare, including academic medical centers, is complex.



Dr. Montoya understands and promotes the importance of ethics and compliance to the faculty and staff of UNM Health Sciences. Her unwavering support and collaboration empower the message of compliance and ethics to thrive for the benefit of UNM.

Dr. Montoya has been an integral advocate of the Health Sciences Disclosure of Outside Activities initiative. The outcome of this initiative has a profound impact on the safety of UNM and its staff and will allow both to flourish. Her support of this project is vital to its departments throughout Health Sciences.

### **Mei-Lee Palmer, Labor and Employee Relations Officer – Human Resources**

Mei-Lee Palmer serves as the Labor and Employee Relations Officer in the Division of Human Resources (HR), overseeing both employee relations and labor relation matters for staff employees. Mei-Lee brings a wealth of knowledge to her role at the University, with over 20 years of professional human resources experience. Mei-Lee has been with UNM for over 7 years where her specialized knowledge and expertise have resulted in successfully investigating staff concerns and establishing productive



working relationships with union representatives, ultimately leading to successful bargaining and agreement on critical union matters.

Mei-Lee oversees a team of professional staff, providing leadership and guidance on reviews and recommendations of staff complaints and she is a key contributor to the management team. Mei-Lee actively partners with other investigatory departments on shared jurisdiction matters, providing consistency and alignment on joint cases. Mei-Lee's expertise and contributions play a key role in UNM's ability to effectively support both departments and employees across campus.

### **Dawn Harrington, Chief Information Officer – UNM Health and Health Sciences**

In today's complex technologically advanced environment, coupled with our dependency on a variety of information systems to complete our daily tasks, the unwavering leadership of Dawn Harrington, Chief Information Officer for UNM Health and Health Sciences, is of paramount and crucial importance. Dawn ensures our Information Technology (IT) systems are protected from both internal and external threats and for developing and implementing IT policies, procedures and best practices that ensure our IT systems are not compromised and operate in a compliant and ethical manner.



Dawn serves on several Compliance Committees including the UNM Health and Health Sciences Executive Compliance Committee; the UNM Health System Compliance Committee; and the UNM Health Sciences Compliance Committee. Her contributions and insight as a member of these Committees is invaluable and serve to promote and further enhance a greater understanding of compliance and ethics to her staff and to all employees who work at UNM Health and Health Sciences.

## **Explaining Conflict of Commitment**

by Brie Delvin, HSC Compliance Manager

Conflict of Commitment is a type of Conflict of Interest. While Conflict of Interest is primarily concerned with financial conflicts, Conflict of Commitment is concerned with conflicts of time and effort. Conflicts of Commitment can occur when one's personal or secondary commitments, collectively

known as Outside Activities, interfere with their primary work-related obligations to UNM.

Conflicts of Commitment can manifest themselves in various forms, including moonlighting at a second job, engaging in personal projects during work hours, or overextending involvement in volunteer activities.



**HEALTH  
SCIENCES**  
COMPLIANCE OFFICE

When they are not appropriately balanced and managed, Outside Activities have the potential of becoming Conflicts of Commitment. This can negatively affect one's primary responsibilities at UNM by resulting in divided attention, reduced productivity, and ethical breaches. Conflicts of Commitment can also raise questions around misuse of company resources and can potentially become a Conflict of Interest if the Outside Activities compete with UNM's. Mitigating the potential negative impacts of Conflicts of Commitment is done through disclosure and transparency of Outside Activities. Disclosure allows assessment of the Outside Activity and opens lines of communication to make any necessary adjustments to ensure any conflicts are managed and prevents any implied bias or impropriety. It also results in a clear understanding of expectations to ensure Outside Activities do not develop into a Conflict of Commitment.

It is important to understand that engaging in Outside Activities while employed at UNM is not discouraged. Discussing with your supervisor and following policy is vital to safeguarding your Outside Activities. UNM Health Sciences is currently developing a robust policy and process to streamline disclosure and discussion. Outside activities can greatly enhance contribution to an individual's job and benefit UNM and the communities it serves. Working together to manage Outside Activities results in ensuring an individual's primary responsibilities to UNM are not undermined by evolving into Conflicts of Commitment and builds trust and integrity among all staff.

## **Improving compliance with applicable regulations for IT-related purchases and licensing**

by Jeff Gassaway, Information Security Officer

On behalf of UNM-IT, UNM's Information Security and Privacy Office (ISPO) and UNM Purchasing, this article provides insight into the processes involved in purchasing or licensing IT-related goods and services, to help ensure that UNM complies with applicable policies and laws, and is a good steward of the information entrusted to UNM.

Many teams engage in the critical work required to complete a purchase or license IT-related goods and services. Until you are ready to make such a purchase, however, that work may be invisible to our community. To provide insight into these processes, a summary of the roles and activities of some of the major stakeholders is provided below.

### **Purchases and licenses for IT-related goods and services**

Whenever IT-related goods and services are bought or licensed on behalf UNM, and especially whenever a third-party may have access to Personally Identifiable Information (PII) through those purchases or licenses, UNM-IT, ISPO areas, along with UNM Purchasing and other critical stakeholders, have shared processes for assessing risks to that data, and to any related IT systems, when there may be connections to UNM systems involved, to help ensure UNM remains compliant with relevant policies and laws.

For context, there are numerous regulations that apply to UNM and that require these risk assessments, including The Common Rule for Human Subject Research, Family Education Rights and Privacy Act (FERPA) and the Gramm-Leach-Bliley Act (GLBA) for



student and student financial aid information, and Health Insurance Portability and Accountability Act (HIPAA), as well as several related regulations that may apply to UNM where HIPAA-related work takes place, including the Health Information Technology for Economic and Clinical Health (HITECH) Omnibus rule. With that, below is a summary of the roles and activities involved in these compliance processes:

**IT Officers (ITOs)** - ITOs are individuals in Colleges and Departments who provide IT services and support to their areas, and whom ISPO staff have trained on these risk management processes. ITOs submit Privacy and Security Questionnaires (PSQs) on behalf of their customers to initiate purchases and renewals of goods and services.

**Privacy and Security Questionnaire (PSQ)** – PSQs are a short form that documents what data is involved/ will be used with the IT goods and services, and where applicable, how third-parties will access that data. While it is a short form, it does a lot of work for us. We use the form to evaluate what regulations apply to the data, so we know what language has to be included in purchasing documents, such as Purchase Orders (POs), Scopes of Work (SoWs), Request For Proposals (RFPs), Contracts, Procurement Cards (PCards), and any other ways of making purchases. This process must also be followed even if there is no cost for goods/ licenses since compliance with regulations is required regardless of whether or not a purchase is made.

**Data Stewards** – UNM Data Stewards must approve the use of data under their purview. This [link](#) lists UNM Data Stewards and the data for which each steward has authority. Stewards also require specific safeguards to be implemented for use with data under their purview.

**Risk Summary** – this is a short form that customers don't normally see, but that ISPO uses to identify steps taken to help protect the privacy of individuals whose data is involved in purchases/ licenses. For example, where possible using NetID instead of BannerID can reduce risks of Identity Theft and Fraud in the event of a vendor data breach. Or, using Age rather than Date of Birth (DoB) can also reduce the likelihood of Identity Theft, while still enabling academic, administrative, clinical, or research functions.

**Review of safeguards/ compliance documents** – Documents including Higher Education Community Vendor Assessment Toolkit (HECVAT) documents, System and Organization Controls (SOC) II, Type II documents, audit summaries, and certain International Organization for Standards documents are evaluated to determine whether reasonable and appropriate controls are in place to protect UNM data. In some cases, ISPO staff review and rate vendor responses. In other cases, UNM can legally rely on third-party audits and related documents to establish that controls are in place.

**Risk Memo** – in some cases, there is residual risk related to a purchase or license. UNM staff document these, along with stakeholders in HIPAA Privacy, Office of University Counsel, and UNM Compliance, to bring stakeholders together in understanding what those risks are, and to formulate a plan to address, or in rare cases,

accept those risks. Often, UNM-IT is able to apply additional safeguards mitigate those risks, but the costs and work of those changes needs to be document.

These steps have been fine-tuned over many years to make them more efficient and more effective at helping manage risks to Personally Identifiable Information (PII) of UNM employees, patients, research subjects, and students.

## **Campus Safety Week 2023**

by Adrienne Helms, Clery Coordinator

This year during National Campus Security Awareness Week, CEEO teamed up with Environmental Health & Safety (EHS), UNMPD, and other departments to host Campus Safety Week once more. The week kicked off on Monday, September 18 with Campus Safety Walks, fentanyl strip testing, threat assessment presentations, fire extinguisher demos, CPR training, free VIN etching, and more. Each event showcased the University's safety initiatives while raising awareness around safety and security and empowering community members to safeguard themselves and their belongings.



**Attendees at the Campus Safety Week Summit listen to a presentation.**

On Thursday, the Safe Campus Living Task Force, chaired by CEEO and UNMPD, hosted UNM's first Campus Safety Summit in the SUB. The Summit brought together a lineup of campus partners and providing updates on security operations, UNM's Office of Violence Against Women (OVW) grant, the Campus Safety Plan, Threat Assessment Team, UNMPD's new Campus Watch program, the Culture of Safety initiative.

The Summit provided an opportunity for stakeholders from across UNM, UNM Hospitals, Branch Campuses, the Albuquerque Police Department (APD), the Central New Mexico Community College (CNM), and the City of Albuquerque's Public Safety ECHO to gather information, exchange ideas, and establish relationships based on UNM's first priority: safety.



(l. to r.): UNM Chief of Police Joseph Silva along with APD Acting Deputy Commander Ray Del Greco, UNM PD Commander Arturo Gonzalez and UNM PD Security Operations Director Jeff McDonald.

## **Title IX changes in recent years**

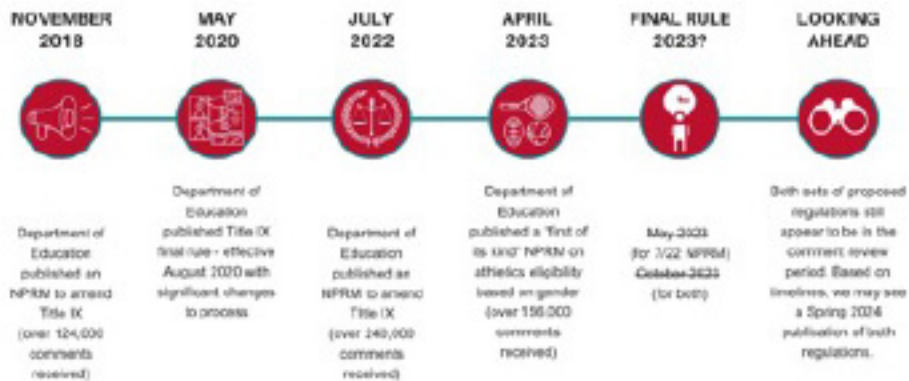
by Angela Catena, Title IX Coordinator

The Biden Administration has recently initiated amendments to Title IX through two Notices of Proposed Rule Making (NPRM). The first NPRM, published in July 2022, focuses on enhancing overall Title IX protections and addressing institutional responses to complaints. The second NPRM, introduced in April 2023, is groundbreaking as it is dedicated to athletics eligibility based on gender, offering institutions invaluable guidance in this area.

Originally expected in May 2023, the final rule for both NPRMs has faced delays. The Department of Education has announced that both sets of Rule Making will now be published in October 2023. However, due to pending reviews, the Title IX final rule for both NPRMs is (unofficially) anticipated to be published in Spring 2024, possibly with an effective date in August 2024.



## TITLE IX CHANGES IN RECENT YEARS



Here's a brief overview of expected Title IX changes:

1. Expansion of regulations for comprehensive oversight of compliance areas
2. Removal of geographic restrictions, focusing on downstream in-program effects
  - a. Obligation to address sex-based hostile environments, even if harassment occurs outside of the education program or the United States
3. A systems approach to those impacted and broader community focus
4. Anticipated increased reporting and resource needs due to current Title IX restrictions
5. Regular barrier analysis with a three-year mitigation plan
6. Enhanced protections for pregnant and parenting students
7. Strengthened alternative resolution processes
8. Inclusion of sexual orientation and gender identity protections
9. Clarification of training requirements for university employees
10. Reversion to a Hostile Environment analysis for sexual harassment

UNM is proactively conducting Barrier Analyses in preparation for the final rule's publication and will provide updates as changes unfold. Stay informed as we navigate the evolving landscape of Title IX.

## Export Control

by Jessica Hermosillo, Facility Security Officer

Hello! I'm Jessica Hermosillo, UNM's Facility Security Officer. I wanted to take a moment to draw your attention to some upcoming changes that could affect you, our valued researcher.

In January 2021, former President Trump published National Security Presidential Memorandum-33 (NSPM-33). The focus of the Memorandum is to strengthen protection of U.S. Government-supported research from Foreign interference and exploitation. The Memorandum recognizes that American Science and Technology is essential to our

scientific leadership, economic competitiveness, and national security. However, the Memorandum also points out that some foreign governments do not have a reciprocal dedication to open scientific exchange and they seek to exploit our open environment for their benefit.

NSPM-33 sets forth the requirement for research institutions with more than \$50 million in Federal funding per year to establish a Research Security Program. Within this program, certain training will be required for researchers. This training will be Cybersecurity, Foreign Travel Security, Insider Threat Awareness and Identification, and Export Control (as appropriate).

The Creating Helpful Incentives for Producing Semiconductors (CHIPS) Act was published in August 2022. While the name makes it sound as though it's focused primarily on semiconductors, the document is 394 pages of changes of other science, technology, and research Acts and Policies. Section 10634 of the CHIPS Act refers back to NSPM-33 further emphasizing the requirement for a Research Security Program.

The CHIPS Act states that all individuals listed on an application for Federal award be required to complete the aforementioned training, and the institution will need to certify that such training has taken place.

The requirements for the Research Security Program itself will come from the Office of Science and Technology Policy. A Draft program was published in February of 2023 with comments ending in June 2023. Once this document is finalized, research institutions will have one year to comply.

While you may think, "why do I have to do this?", please note that Presidential Memoranda carry the weight of law, without being numbered and entered into the Federal Register. The CHIPS Act is a Federal Law. Failure for our institution to comply could result in termination of grants, contracts, or awards, and possible suspension or debarment of eligibility for future Federal funding.

As an institution, we don't want to wait until this is a requirement. We want to implement these changes as soon as possible. If you have any suggestions or thoughts, please don't hesitate to contact my office. Jessica Hermosillo, Office 505-277-2058, Cell 505-480-3843 and or email [jhermosillo@unm.edu](mailto:jhermosillo@unm.edu).

## **Popejoy Hall enhances accessibility**

by Heather Jaramillo, Equal Opportunity Director

The Office of Compliance, Ethics & Equal Opportunity is happy to announce that Popejoy Hall has partnered with the University of New Mexico to enhance accessibility for all patrons.

As part of our continued commitment to providing a high-quality experience for all guests, we are proud to announce that we now have a total of 87 assisted listening

receivers, including 65 that are compatible with T-coil hearing aids. These receivers meet the specific standards outlined in the 2010 ADA Standards for Accessible Design. To ensure their effectiveness, Popejoy Hall and the University of New Mexico have taken the necessary steps to obtain documentation from Dr. Tara Harmon-McElhenny, a licensed audiologist, who has performed testing on each device.

Popejoy Hall has also implemented a user-friendly procedure for reporting any issues or concerns with the devices. We created a convenient web form on our website where users can submit their feedback, and our dedicated Popejoy Hall Patron Services Manager will promptly respond to each submission. To further increase awareness of the availability of our assistive listening devices, we have placed signage in various locations throughout our venue.



A recent inquiry by the Office for Civil Rights of the U.S. Department of Education (OCR) was closed after the University and Popejoy Hall implemented the changes discussed above. We are pleased to report the successful resolution of OCR's inquiry, which means in a better, safer, and more accommodating experience for all patrons.

## **Foreign Gifts and Contracts**

by Victor Griego, Internal Audit Director

Financial transparency is at the core of any large institution, therefore safeguards surrounding gifts and donations of foreign sources is a high priority to UNM. Failure to track and disclose foreign gifts can result in various issues, specifically as it relates to reporting to oversight agencies, perception of the public, as well as complying with conditions and restrictions related to the donation.

Section 117 of the Higher Education Act of 1965, which requires institutions of Higher Education to report, specifically characterizes foreign gifts and contracts as, *“all gifts from or enters into a contract with a foreign entity, the value of which is \$250,000 or more, considered alone or in combination with all other gifts from or contracts with that*

*foreign source within a calendar year, the institution shall file a disclosure report with the Secretary on January 31 or July 31, whichever is sooner.”*

Tracking and reporting of gifts and contracts from foreign sources is typically completed by the UNM Foundation, Health Sciences Center Sponsored Projects Office, and the Controller's office.

### **Reporting of Foreign Sourced Gifts and Contracts**

Department of Education Section 117 requires nationally recognized accredited institutions who offer bachelor's degrees or higher, or provides credits towards such degrees, to report disclosures bi-annually. The reporting deadlines are January 31st and July 31, whichever is sooner to the date of the donation.

The reporting must include the aggregate dollar amount received from the foreign entity. The country or principal residence of the donor must be reported to the Secretary when UNM receives gifts from the same donor or enters a contract with a foreign source of \$250,000 from a single instance or in aggregate within a calendar year.

All records and disclosures must be made available to the public per Inspection of Public Records Act (IPRA). Therefore, it is critical that UNM's foreign gift and contract documentation is well organized and readily available for public review.

Internal Audit completed an audit of UNM's foreign gifts and contracts reporting process and is working with key UNM offices to ensure gifts and contracts from foreign sources are always appropriately reported in accordance with Section 117 of the Higher Education Act of 1965. Policy will soon be issued to formally govern UNM's foreign gift and contract reporting requirements.

## **Conflict of Interest**

by Victor Griego, Internal Audit Director

A key responsibility of UNM employees is to act unbiased as it relates to budgeting and spending of University funds. It is important to make decisions with the interest of the University in mind rather than for the benefit of the employee. All UNM employees with positions of financial responsibilities should avoid circumstances which gives the appearance of improper influence of financial activity.

The Governmental Conduct Act (GCA) was enacted in 1967, formally known as the "Conflict of Interest Act". The GCA's legal requirements make it crucial that all UNM officials and employees understand their ethical responsibilities to ensure that they conduct themselves solely in the interest of the public.

UNM officials and employees should avoid financial transactions which benefit them personally. A conflict could arise if there's financial transactions or business activity that provide, or give appearance, of a direct or indirect financial benefit to the employee or



the employee's immediate family. If a situation arises with questionable circumstances, employees should voluntarily provide full disclosure of the potential conflict.

UNM has policy surrounding employee code of conduct and conflict of interest, which includes avoiding the "appearance" of creating a conflict of interest. Employees are expected to complete job duties and responsibilities in a manner that never give rise to suspicion of improper conflict with interests of the University. Example of actuals, and appearance, of a conflict of interest are:

**Actual Conflict:** John Doe, UNM employee, with procurement authorization contracts with ABC Company to complete a landscaping project, which is owned by John Doe's uncle. UNM pays ABC Company \$10,000 to complete the project. The business transaction results in an actual conflict of interest surrounding an immediate family member of the UNM employee having a direct financial interest in the business transaction. John Doe is in violation of UNM policy

**Appearance of Conflict:** Jane Doe, UNM employee, is a management level employee for a UNM department. *Jane frequently* accepts favors and gratuities such meals, concert tickets, and movie tickets from a vendor that does business with Jane's department. Receiving gifts from the vendor creates an appearance or suspicion that Jane Doe is receiving gifts in return for increased business. Jane Doe is violation of UNM policy.

Internal Audit works on reviewing conflict of interest issues surrounding the above examples, as well as others. Audit recommendations are issued to address and help prevent employee conflict of interest.

## **Conflict of Interest Policy Update**

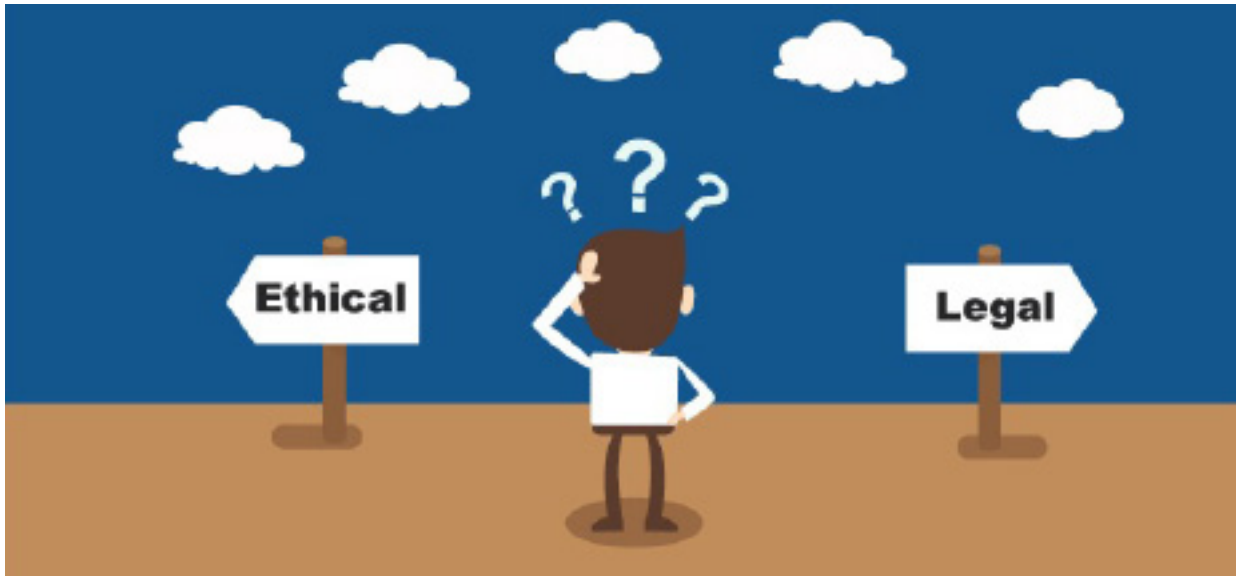
by Francie Cordova, Chief Compliance Officer

Preservation of trust is the essential purpose of policies about conflict of interest. Failing to manage conflicts of interest can have negative consequences for an organization. Public trust and confidence in your organization could decrease and your reputation might suffer, which will, in turn, result in increased expenses in the form of time, energy, and resources to mitigate these consequences. As such, inadequately or insufficiently managed conflicts of interest represent a significant risk for all organizations.

A conflict of Interest occurs when an individual's personal interests – business, family, friendships, financial, or social factors – could compromise or appear to compromise his or her judgment, decisions, or actions in the workplace. It is probable and likely that you will be faced with a conflict of interest in your work at UNM. But not all conflict is created equal – some conflicts of interest may be illegal. Most conflicts of interest can be easily managed by an organization if they are disclosed, tracked and the conflicts managed and mitigated.

## Disclosure

Disclosure and transparency are the hallmarks of properly addressing conflict of interest. Currently CEEO is working with campus partners to require annual disclosure by all staff, faculty, and student employees. The disclosure will be reviewed by the appropriate supervisor. If no actual or perceived conflict exists, the disclosure is recorded. If a real or perceived conflict of interest is disclosed, the supervisor will develop a mitigation/management plan that will be followed and updated as necessary.



An example of a conflict of interest is that your family business is interested in doing business with UNM. This is not illegal. Instead you should disclose the family business and any interest the business has in providing services/goods at UNM, The disclosure will then be reviewed and if there is a real or perceived conflict of interest, an appropriate management plan may include removal of any oversight or selection of the family business, and should also include a competitive selection process that ensures that the family business is the one best suited to provide the services due to because of qualifications, price or other factors.

UNM will soon promulgate aligned COI policies that can provide the transparency needed in a public university setting.

---

For more information about compliance at The University of New Mexico, visit the [UNM Office of Compliance, Ethics & Equal Opportunity](#) or the [HSC Compliance Office](#).