

BOARD of REGENTS



AUDIT AND COMPLIANCE COMMITTEE MEETING

*Monday, June 29, 2015 at 11:00 am
Scholes Hall, Roberts Room*

The University of New Mexico
Board of Regents' Audit and Compliance Committee
June 29, 2015 – 11:00 AM
Roberts Room
Agenda

ACTION ITEMS

1. Confirmation of a Quorum and Adoption of Agenda
2. Approval of Meeting Minutes from April 22, 2015
3. Audit Committee Meeting Calendar for Fiscal Year 2016. The following proposed meeting dates are being presented for Committee approval. The Committee meets at 9:00 AM in the Roberts Room. This schedule will accommodate the exit conference for the FY15 financial statements audit and entrance conference for FY16 External Audit.

August 18, 2015

November 5, 2015 (Exit Conference FY15 External Audit)

February 18, 2016

April 21, 2016 or May 19, 2016 (Entrance Conference FY16 External Audit)

4. University Guiding Principles – Draft Regents' Policy 2.18 (*Amy Wohlert, Chief of Staff and Pamina Deutsch, Director, Policy Office*)

INFORMATION ITEMS

5. Advisors' Comments
6. Follow-Up Items from April 22, 2015 Meeting
7. Main Campus Chief Compliance Officer Status Report (*Helen Gonzales, UNM Main Campus Chief Compliance Officer*)
8. Status of Audit Recommendations (*Chien-chih Yeh, Internal Audit Manager*)
 - Implemented
 - Pending
9. Director of Internal Audit Status Report (*Manu Patel, Internal Audit Director*) and Working Lunch

The University of New Mexico
Board of Regents' Audit and Compliance Committee
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EXECUTIVE SESSION

10. Vote to close the meeting and to proceed in Executive Session as follows:

- a. Discussion of Final Internal Audit Reports, pursuant to limited personnel matters exception at Section 10-15-1.H(2) NMSA (1978), exception for matters subject to attorney-client privilege pertaining to threatened or pending litigation at Section 10-15-1.H(7), NMSA (1978).
- b. Discussion of limited personnel matters pursuant to exception at Section 10-15-1.H(2) NMSA (1978);
- c. Schedule of Audits in Process, pursuant to exceptions at Sections 10-15-1H(2 and 7), NMSA (1978);
- d. Proposed FY15 Audit Workplan exceptions at Sections 10-15-H(2 and 7), NMSA (1978); and
- e. Vote to re-open the meeting.

11. Certification that only those matters described in Agenda item # 10 were discussed in Executive Session and if necessary ratification of action, if any, taken in Executive Session

12. Adjournment

THE UNIVERSITY OF NEW MEXICO
Board of Regents Audit and Compliance Committee Meeting
April 22, 2015 – Meeting Minutes

Members Present: Chairman Lt. Gen. Bradley Hosmer, Vice Chair Jack Fortner, Regent James Koch (Quorum); Regent Marron Lee attended as an open session observer.

Other Attendees: Robert Frank, David Harris, Helen Gonzales, Chris Vallejos, Amy Wohlert, Elsa Cole, Stuart Freedman, Liz Metzger, Chaouki Abdallah, Dorothy Anderson, Pamina Deutsch, Gil Gonzales, Purvi Mody, Shawna Gonzales, Carla Prando, Renee Delgado-Riley, Manu Patel, Chien-chih Yeh, Lola Neudecker, Lisa Wauneka, Avedona Lucero, Victor Griego, Eileen Sanchez, Mallory Reviere, Suzanna Finley, Amy O'Donnell, John Kennedy (KPMG), Nick Williams (KPMG), DeVon Wiems (Moss Adams), Josh Lewis (Moss Adams).

Chairman Hosmer called the meeting to order at 9:00 AM in ROBERTS ROOM, Scholes Hall, UNM.

ACTION ITEMS:

- The Committee approved the minutes from the meeting of December 4, 2014 with a majority vote – one abstention, because Regent Fortner was not a Committee member at the time of the previous minutes.
- The Committee approved proposed meeting dates of June 18, 2015, August 18, 2015, and October 15, 2015. The October 15 date is provisional subject to external audit status.

INFORMATION ITEMS:

- There were no Advisors' Comments.
- Follow up items:

Internal Audit Director Patel addressed the Committee regarding follow up items from the two previous meetings. The Clery Coordinator position has been taken care of financially for fiscal year 2016. There is sufficient budget - approximately \$257,000 for the Coordinator, training, and educational materials. Clery Act trend data/crime statistics are not prepared because there is no Coordinator on board yet. Once the position is filled, Helen Gonzales, Main Campus Chief Compliance Officer will work with the Coordinator to identify the trends and compile the data. Chairman Hosmer asked about the University's exposure. There are 22 pending Clery Coordinator actions; either pending with Interim Coordinator Chester or awaiting the new hire. Ms. Gonzales replied that there is a Compliance Committee that is meeting regularly to support the Interim Coordinator. The Committee is confident that all elements are being met. Substantial activity is ongoing, and while there is a lot of work yet to be done, everything will be in line for the next reporting cycle (last year's data, due October 1, 2015). The UNM Police Department has requested crime statistics from campus security authorities. They are making a push to get all campus security authorities trained, and are continuing to identify geography, etc. If inspectors were to come, they would be OK with that. Regent Fortner asked if there is any duplication of effort with Clery Act and what UNM is doing with Title IX. Ms. Gonzales stated there is not duplication; however, there are places they align well together. There is a new CARE model and Lobo Respect subcommittees that are working together. There is a compliance subcommittee looking at requirements in both of those laws as well as other laws. Director Patel added that from an audit perspective there has been much progress between the

2012 Clery report and the 2013 Clery report. The policy statements and the data they send to the Department of Education are a lot better. If inspectors were to come, we would not be at 100 percent, but we would be a lot better than we were two years ago. Chairman Hosmer asked if 2012 was a letter grade of "D," and we aspire to an "A," what would it be now? Director Patel stated B-plus. Ms. Gonzales said she would say B-minus. The Provost is assisting with making sure faculty members are getting trained. The Provost said it is at a D-plus on that front. Chairman Hosmer asked Amy Wohlert, Chief of Staff, President's Office, if it still makes sense to consider an assistant for the current Interim Clery Coordinator. Ms. Wohlert stated there are now enough eyes on the problem, the budget, and a clear path forward in terms of hiring. UNM is also in the process of hiring a new OEO director who will oversee both Title IX and Clery operations. Through the Provost's Office, Dean of Students, and campus committees there is good coordination with OEO, University Counsel, etc. We have gone from blissful ignorance, to panic, to awareness of what we have to do. Chairman Hosmer asked that the appropriate parties go back through the 22 items and add dates for completion.

The last open session follow-up item is regarding guiding principles. Ms. Wohlert led the discussion on that subject. She stated that at the last meeting, there was tentative approval of the principles and the policy that was written surrounding the principles. The Committee directed Ms. Wohlert and her team to amend the preamble language, which they did. They have that draft and would be happy to present that again. There are other efforts ongoing on campus, such as new members of the Faculty Senate Ethics Committee who were not present during the drafting of the principles. There are also student government changes. Ms. Wohlert recommended that the good effort that has been accomplished be put out there now, partly due to the Human Resources evaluation component. This is more or less an update of the University Values we had before, with current terms and aligned with the current mission. When UNM puts the policy out for review, it is likely many things will unearth. Ms. Wohlert asked the Committee if they should go forward with it. Chairman Hosmer asked if the Committee could take a look at the materials later in this meeting.

- KPMG and Moss Adams presented the Entrance Conference for the FY15 External Audit. Liz Metzger, University Controller asked the members of each of these firms to introduce themselves. The contract for this audit is still awaiting approval from the State Auditor's office. They are in the preliminary, preparatory stages at this point while they await approval. The firms and the Higher Education Department have all signed the contract. John Kennedy, Partner, KPMG, and DeVon Wiems, Partner, Moss Adams introduced their service teams and walked through the plan for the audit work. KPMG will perform the audit for Main Campus and non-clinical component units such as the UNM Foundation, Lobo Club, etc., as well as KNME and KUNM. Moss Adams will cover clinical operations including UNM Hospital, Sandoval Regional Medical Center, the UNM Medical Group, etc.

Chairman Hosmer asked if these particular audit teams have worked together on the audit before, or have they just come together for this particular project? Mr. Kennedy stated they have the same team. Mr. Wiems stated that they have one new member but the rest of the team members have worked on this before.

They will conduct an A-133 audit, which is transitioning to the terminology of Uniform Guidance Audit. They do need the University to provide them with a schedule of all the grants and related dollar amounts. The audit is conducted in accordance with government standards,

the State Audit Rule, and other regulations. Chairman Hosmer asked if they make their own risk assessments when choosing which items to sample. Mr. Kennedy stated they do. Every program has to be listed once every three years at a minimum. The teams will communicate with this Committee at various times throughout the audit and will notify them if significant matters arise. Chairman Hosmer noted that the reverse is also true – they have full access to this Committee and its chair. Regent Koch added that the Committee can ask for certain audits.

Mr. Kennedy informed the Committee that their responsibility is to provide reasonable but not absolute assurance relative to the financial statements, indicating they comply with GAAP and are materially correct and free of misstatement. They will also report to the individual audit committees/boards of the reporting units. They use a risk-based approach and will test certain internal controls of processes, in areas such as cash receipts, bond activity, investments, payroll, non-payroll expenditures, grants and contracts, accounts receivables, patient revenues, and information technology. They will test that issues resulting in findings last year are fully resolved, and look for any non-routine transactions. Mr. Kennedy stated they also look at NCAA activities such as contracts. They will ask the State Auditor if he is going to require that they perform a stand-alone audit on the VEBA plan; otherwise they are not planning on it at this point because there have only been deposits, not activity. There is a new accounting standard, GASB 68, relating to pensions. The underlying impact to UNM is unfunded pension liability at the state level now gets pushed down to UNM, so that UNM has to reflect their share of that unfunded liability. The number will be large but will be primarily a bookkeeping exercise. Rating agencies have recently come forward and said they are not going to view this negatively relative to the ratings for the most part. Also, now, the liability will be affected by the performance of investments. Private accounting has had similar accounting for close to 10 years; it's primarily getting governmental accounting up to speed.

For clinical operations, Moss Adams will focus on revenue cycle, as that is where most risk of error occurs. They will also look at accounts receivables, payroll, cash, investments, information technology, etc. The largest contingencies tend to be in malpractice. To a large degree, those liabilities are indemnified by the State and do not show up on the balance sheet. There is bond refunding that may or may not occur before June 30. If it happens prior to June 30, they will look at that this year.

Chairman Hosmer noted that IT issues evolve fairly quickly. He asked for an assessment of their current IT auditing expertise. Both firms replied that they have staff members who audit IT year round and they consider themselves to be on the cutting edge both in tools and knowledge. However, their focus is limited – mostly to IT access controls. Moss Adams stated they have subject matter experts.

In terms of timeline, KPMG and Moss Adams hope to start field work in the next couple of weeks. They plan to have a draft audit report to the Committee at the October meeting and the report delivered to the State Auditor in mid-October.

- UNM Internal Audit and UNM Health System Internal Audit provided the Committee with an orientation presentation. The Audit and Compliance Committee was created based on Regents' Policy 1.2. It is a standing committee of the Board of Regents. One member of the Committee should be a financial expert. The Committee meets at least four times per year and follows the Open Meetings Act. Regent Koch commented on the Open Meetings Act. If there are four

members present, there is a quorum. To that end, this is the only committee that is to have only three members. That way, there is never a violation of the Act. This independent Audit and Compliance Committee's responsibility includes review of the University's financial reporting, internal controls, risk management, performance of external audit, compliance with laws and regulations, internal policies, whistleblower program, and the compliance program. The Internal Audit department was established under Regent Policy 7.2, performs a comprehensive internal audit function, and has unrestricted access to all functions, records, property, and personnel. Internal Audit has the authority to obtain assistance from other departments. To maintain independence, the Internal Audit Department and Compliance Office report functionally to this Committee and administratively to the President's Office. Internal Audit is free from any interference in determining the scope of audits, and is empowered to obtain information as needed.

Purvi Mody, Executive Director, UNMH Compliance and Audit, informed the Committee that her office reports functionally to the audit committees of each health system entity. Audit reports are presented to these committees, then to the HSC Audit and Compliance Committee, and then to this Committee. As of March 2015, her department reports administratively to Steve McKernan, CEO, UNMH. Previously, the department reported to Ella Watt, CFO. They have full access to each of the Committee members and to the Board. They perform a separate risk assessment at each of the entities. In 2013, REDW performed a three-year Hospital risk assessment that they are following. In June, 2015 there will be a new risk assessment for the Hospital. Chairman Hosmer stated they were previously financially based. Should we expand them to include operational risk assessment? For the University as a whole the heaviest risks we face in the future are operational.

Ms. Mody stated that SRMC is now under a 501 community risk assessment and are required to do that. The Hospital is starting to incorporate some of that. Regent Koch noted they have the authority to do that now in this Committee. Regent Fortner feels that type of assessment might be performed by Administration. Regent Koch stated that is not the case because of the independence. Chairman Hosmer added that risk and risk assessment is owned by this Committee. That does not mean that Internal Audit is a necessary instrument in mitigating that risk. It could be that this Committee reaches a risk assessment with all of the appropriate experts and then says the individual who owns that risk is the Provost, or Enrollment Management, etc., and the task may be passed on to the appropriate area. This Committee's task would then be to monitor how the plan is working. Chairman Hosmer would like to see this going forward in the next cycle. Mr. Patel stated that Internal Audit did an in-depth, thorough risk assessment last year and included some operational risk. They met with leadership all over campus to talk about their risk, including operational risks. Ms. Gonzales stated that she is partnering with Internal Audit and a big focus of what she is doing is risk assessment. That risk assessment is broader and works with all of the compliance partners to identify risks, which might be more operational. Ms. Mody addressed a previous question about the Cancer Center audits. She stated her office audits the clinics, and Main Campus Internal Audit covers the research areas. Mr. Patel provided information as to what the Internal Audit function is and is not authorized to do. Chairman Hosmer stated the Committee could read the materials and if they have any questions they will ask. Regent Koch noted that when the Committee was formed, they went into great depth as to how to set it up, and that it was clear what the function is. Chairman Hosmer stated the orientation provides very useful information to the Committee members. Mr. Patel wrapped up the presentation by stating that Internal

Audit departments are required to comply with the standards and ethics of the Institute of Internal Auditors and also comply with guidelines of the American Institute of CPAs. To make sure Internal Audit is following the standards properly and is producing a quality work product, the department is required to have a peer review every five years. The last peer review was approved by this Committee in March, 2013. The Peer review was conducted by the Audit Director of NM State University and the former Audit Director of University of Texas Pan American. Per a request from Regent Koch, Mr. Patel provided the new members with a quick synopsis of his professional background.

Ms. Gonzales provided the Committee with Compliance Office orientation material and an overview of her professional background. She stated a big part of her role is assuring there are appropriate controls in place so that units can perform correctly, appropriately, ethically, etc. She works proactively with management to mitigate institutional risks. In light of what happened at Penn State, a lot of higher education institutions that only had compliance offices for their healthcare systems, began centralizing compliance areas. The Freeh Report that resulted from the Penn State investigation recommended creation of independent compliance functions for universities. You would now be hard pressed to find a large university that does not have a Chief Compliance Officer. President Frank commissioned a review of UNM's compliance function. That review recommended centralized compliance through a Chief Compliance Officer with decentralized delegation to compliance partners. Ms. Gonzales has a compliance committee of individuals responsible for the various compliance obligations. She uses the seven elements of federal sentencing guidelines to help structure their work.

In August 2013, there was an article that talked about "Welcome to Compliance U." The article talked about the incredible increase in the amount of compliance obligation. It has become quite a burden for universities. There will need to be a significant cultural change in higher education to adapt to that. Key partnerships for her compliance office include HSC Compliance, Internal Audit, University Counsel, the Policy Office, etc. Ms. Gonzales introduced Compliance Specialist Eileen Sanchez who spends a great deal of time researching new compliance obligations affecting universities. They document any reporting requirements and policy implications, and send reports to the compliance partners. Compliance partners come to the quarterly meetings. Regent Fortner asked where the current Department of Justice investigation falls. Ms. Gonzales replied that it spans a number of places, including Office of Equal Opportunity, Student Affairs, and University Counsel (they are not a compliance partner, but have an advisory role to the Compliance Committee).

Her goals this year include developing a risk identification and mitigation reporting process, developing and maintaining a compliance directory, revising the Whistleblower policy, and launching a new ethics and anonymous compliance reporting system (completed). There is now a new hotline vendor available 24/7 (Ethicspoint from Navex Global began on March 26, 2015) with enhanced reporting capabilities. Starting at the next meeting, Ms. Gonzales will begin providing metrics from the hotline reporting. Her office is doing the triage for all phone calls and website complaint entries. If individuals are named in the complaint, the vendor makes sure those individuals are not sent the complaint information. Investigators can online chat with persons who report (even anonymously). They need to work on creating consistent investigator protocol. There are so many individuals doing the investigating, depending on the area to which the complaint is triaged. There is a new compliance hotline poster and their website contains a great deal of information and resources. It can be found at compliance.unm.edu.

Stuart Freedman, HSC Chief Compliance Officer provided an orientation presentation to the Committee. He informed the committee that compliance is sort of a “new profession.” It is only about 25 years old. The most mature compliance programs have been in the financial sector because of Wall Street problems. But healthcare has also been the subject of this attention for quite a while. The sentencing guidelines that Ms. Gonzales referred to are really at the core of compliance. In addition, they reach out to enforcement agencies to see what they have to say. The one that governs healthcare is the Office of the Inspector General under Health and Human Services. They have created some model compliance program guidelines, so they follow that. They also look at enforcement actions. Having lived through an enforcement action at another University in 1998, Mr. Freedman stated you don't want to go through that five year, burdensome requirement. The Health Care Compliance Association (HCCA) was founded in 1997. In, 2001, the Enron scandal shook many businesses. Lately, a big issue has been the Veteran's Administration. In 2004, sentencing guidelines were updated. In 2012, the Freeh Report was a shocking jolt to academia.

Compliance creates a culture. Culture reflects behavior of all employees. It is about changing behavior. They make a concerted effort to do live training as well as on line, and to get out in front of people. It is important to connect and discuss emerging risk. They do investigations, but do not discipline people. There are differences and similarities between compliance and internal audit. Internal audit does independent assessments; compliance creates a culture. Internal audit does not step in the shoes of management; compliance helps and assists. Internal audit looks at best practices; compliance looks at rules and regulations. Both are independent. Both report to their chief executive officer and to the Boards, with direct access. Billing compliance is their highest risk. HSC Compliance recently had a peer review as well. They participate with American Association of Medical Colleges (AAMC) and University Health Consortium (UHC). They had two reviewers who came for two and a half days; one from the University of Pennsylvania's Children's Hospital, and the other is the Chief Compliance Officer from the University of Connecticut. They found two best practices that are now published on AAMC's website. One involved their Code of Ethics program, and the other their Healthcare Provider Compliance Committee. They have physician champions who talk to their colleagues about compliance. They surveyed their employees in 2012 and 2013 and will do so again soon. Employees brought forward concerns about retaliation. They need to break down that feeling of distrust. Mr. Freedman stated he would like to come back in front of the Committee at a later date and talk about emerging risks and the program going forward in 2015.

- Mr. Freedman provided the Committee with materials regarding what he reported to the HSC Board of Directors for November and December of 2014. It is the first one they published, and includes those very important seven elements as well as meetings, training, reporting data, etc. The next HSC Board meeting is May 1, 2015, and Mr. Freedman will be reporting the first two months of 2015 to them at that time. Chairman Hosmer asked Mr. Freedman if they track training requirements not met. He replied they do track how many employees take the two on line trainings – Ethics and Privacy. They also count how many times they do the live training.
- Ms. Gonzales shared the materials for her quarterly report. She stated that in the interest of time, she would just stand for questions. Most of the information was covered in her earlier orientation presentation. There were no questions.

- Chien-chih Yeh, Audit Manager, presented the audit follow up items. There were two reports: Implemented and Pending. Chairman Hosmer asked if there are any burning issues. Mr. Yeh replied there are not; things are moving along nicely. Chairman Hosmer confirmed that when they see this report at the next meeting, there will be new implementation dates for the Clery items.
- Mr. Patel briefly reviewed his Director's Report, confirming the dates are set for the remainder of FY15. He explained the Hotline complaint data and stated Ms. Gonzales will start reporting the data starting with the June meeting. There are 71 open complaints as of the end of February. As stated previously, there is a new contractor as of March 26, 2015, Navex Global. The current financial report is enclosed in the materials; Internal Audit expects to close out the fiscal year with a reserve of about \$8,000 to \$10,000.

By unanimous consent, the meeting went into Executive Session at 11:08 for the reasons stated in the agenda.

- a. Discussion of Final Internal Audit Reports, pursuant to limited personnel matters exception at Section 10-15-1.H(2) NMSA (1978), exception for matters subject to attorney-client privilege pertaining to threatened or pending litigation at Section 10-15-1.H(7), NMSA (1978);
- b. Discussion of limited personnel matters pursuant to exception at Section 10-15-1.H(2) NMSA (1978);
- c. Schedule of Audits in Process, pursuant to exceptions at Sections 10-15-1H(2 and 7), NMSA (1978);
- d. Proposed FY15 Audit Workplan exceptions at Sections 10-15-H(2 and 7), NMSA (1978); and
- e. Vote to re-open the meeting.

The meeting returned to open session at 12:35 PM, with certification that only those matters described above were discussed in Executive Session. Due to time constraints, two Hospital audit reports will be deferred to the next meeting in June.

The Committee approved the following UNM audit by unanimous consent:

UNM-Taos Audit of Financial and Operational Efficiency, Report 2015-02

Motion to adjourn 12:38 PM. (Motion: Regent Koch, Second: Regent Fortner).

Approved:

Audit and Compliance Committee Chairman

There is no
handout
required for
this item

Regents' Policy Manual - Section 2.18: Guiding Principles

DRAFT OF 6-11-2015



Adopted Date:

Applicability

These guiding principles serve to direct and guide ethical conduct. They apply to all members of the University community: Regents, executive officers, faculty, staff, student employees, students, public and student members of University advisory boards and committees, and other volunteers serving in an official capacity.

Policy Statement

Integrity, trust, the pursuit and dissemination of knowledge, and public service are essential elements of the University's character and guide our decisions. These and other elements of our character are reflected in the guiding principles.

All members of the University community are expected to maintain the highest standard of ethics as articulated in the guiding principles. Our devotion to these principles at all times, under all circumstances, and in all our actions is key to our success as an institution and as individuals.

Guiding Principles

1. Freedom of Inquiry

We encourage, protect, and respect the exploration of ideas and their free expression.

2. Integrity

We build trust through transparency, truthfulness, and responsibility.

3. Inclusiveness and Respect

We thrive in a diverse environment characterized by respectful regard for other persons, recognition of their dignity, and considered use of influence and power.

4. Responsibility to Community

We reflect upon our past, serve our present, and strive to improve our future through thoughtful stewardship of our cultures and environment.

Implementation

The President shall ensure that all members of the University community are aware of the guiding principles, which are supported by existing policies and procedures.

Related Policies

Freedom of Inquiry

- RPM Policy 2.1 (“Free Expression and Advocacy”)
- RPM Policy 2.2 (“Speakers from Off Campus”)
- UAP 2220 (“Freedom of Expression and Dissent”)
- RPM 5.1 (“The Faculty’s Role in the University’s Academic Mission”)
- Faculty Handbook Appendix 7 (“Statement on Extramural Utterances”)

Integrity

Codes of Conduct and Ethics

- RPM 1.8 (“Regent Code of Conduct and Conflicts of Interest Policy”)
- RPM 4.2 (“Student Code of Conduct”)
- The Pathfinder (“Student Code of Conduct”)
- Faculty Handbook D100 (“Dishonesty in Academic Matters”)
- RPM 6.4 (“Employee Code of Conduct and Conflicts of Interest”)
- UAP 3715 (“Code of Conduct”)
- RPM 2.8 (“Visitors to the University”)
- The Pathfinder (“Visitor Code of Conduct”)

- HSC Code of Ethics

Research

- Faculty Handbook E40 (“Research Misconduct”)
- Faculty Handbook E90 (“Human Beings as Subjects in Research”)
- Faculty Handbook E100 (“Policy Concerning Use of Animals”)
- Faculty Handbook E110 (“Conflicts of Interest in Research”)
- Faculty Handbook E120 (“Effort Reporting Policy”)

Grievance Procedures and Dispute Resolution

- RPM 4.3 (“Student Grievances”)
- Faculty Handbook D175 (“Student Conduct and Grievance Procedures”)
- Faculty Handbook D176 (“Graduate Student Grievance Procedures”)
- Faculty Handbook C07 (“Faculty Disciplinary Policy”)
- UAP 3215 (“Performance Management”)
- RPM 6.10 (“Dispute Resolution and Employee Grievances”)
- UAP 3220 (“Ombuds/Dispute Resolution Services for Staff”)

Reporting Misconduct

- UAP 2200 (“Whistleblower Protection and Reporting Suspected Misconduct and Retaliation”)
- UAP 7205 (“Dishonest or Fraudulent Activity”)

Inclusiveness and Respect

Diversity

- RPM 2.4 (“Diversity and Campus Climate”)

Sexual Harassment

- RPM 2.5 (“Sexual Harassment”)
- UAP 2730 (“Sexual Harassment”)

Respectful Campus

- UAP 2240 (“Respectful Campus”)

- Faculty Handbook C09 (“Respectful Campus”) *Includes procedures for reporting and investigating complaints of faculty bullying*

Equal Opportunity

- RPM 2.3 (“Equal Opportunity and Affirmative Action for Employees and Students”)
- UAP 2720 (“Equal Opportunity, Non-Discrimination, and Affirmative Action”)
- UAP 2310 (“Academic Adjustments for Students with Disabilities”)
- UAP 3110 (“Reasonable Accommodation for Employees with Disabilities”)
- UAP 2295 (“Service Animals”)

Responsibility to Community

- RPM 2.10.1 (“Historic Preservation”)
- UAP 5020 (“Historic Preservation”)
- UAP 2100 (“Sustainability”)

There is no
handout
required for
this item

**INFORMATION
TO
BE
SUPPLIED
AT
MEETING**

Chief Compliance Officer Quarterly Report

Submitted by Helen Gonzales, Main Campus Chief Compliance Officer (CCO)
 June 18, 2015

Compliance Office Main Focus Area:

Sentencing Guideline:

Track Federal and State Regulations to identify compliance obligations that affect UNM.	Standards & controls
Maintain a compliance directory of institutional obligations, including reporting obligations, UNM policies, and training programs.	Standards & controls Training & communications
Conduct risk assessments.	Evaluation, auditing, and monitoring
Track Compliance Partners’ risk mitigation strategies.	Evaluation, auditing, and monitoring
Administer the Compliance & Ethics hotline.	Monitoring Open lines of communication
Report compliance status to the administration and the Board of Regents.	Oversight

1. Track Federal and State Regulations to identify compliance obligations that affect UNM

In February, 2015, the United States Senate Committee on Health, Education, Labor, and Pensions received a report of the Task Force on Federal Regulation of Higher Education, “Recalibrating Regulation of Colleges and Universities”

- a. Study says Vanderbilt University spends \$150 million, or 11 percent of its expenditures, annually, complying with federal rules and regulations (Boston Consulting Group). This adds \$11,000 in additional tuition for each student.
- b. The Higher Education Act totals nearly 1,000 pages; there are over 1,000 pages in the official Code of Federal Regulations devoted to higher education (total report has over 175,000 pages); and on average every workday the Department of Education issues one new sub-regulatory guidance directive or clarification.
- c. While the primary focus of the report was on requirements imposed by the Department of Education, institutions of higher education are also regulated by every Cabinet-level agency, as well as many sub-Cabinet-level agencies.

The top 3 are Department of Education, Department of Labor, and the IRS (Hartwick College analysis)

- 2. Maintain a compliance directory of institutional obligations, including reporting obligations, UNM policies, and training programs.**
 - a. The Main Campus Compliance Office has developed a directory of over 500 obligations for our 21 Compliance Partners.
- 3. Conduct risk assessments**
 - a. The Main Campus Compliance Office partners with Internal Audit annually to conduct a risk assessment.
- 4. Track Compliance Partners' risk mitigation strategies.**
 - a. The Main Campus Compliance Office developed a risk mitigation worksheet for Compliance Partners to identify the internal controls implemented for each identified risk. This is currently being implemented.
- 5. Administer the Compliance & Ethics hotline.**
 - a. The majority of our activity this last quarter has been on implementation of the compliance & ethics hotline.
 - i. Developed a Main Campus contact list that identifies responsible departments for each of the violations in the hotline.
 - ii. Developed hotline administration protocols
 - iii. Developing investigation protocols
 - b. Metrics are being tracked for new cases since implementation.
 - i. 38 cases from April 1 – June 5, 2015
 - c. In the recently released, "UNM Staff Engagement Survey," 58% of respondents indicated that they would contact the UNM anonymous hotline to report violations of laws, regulations, or policies. 11% indicated they would not contact the hotline.
- 6. Report compliance status to the administration and the Board of Regents**

Excerpt of the Report of the Task Force on Federal Regulation of Higher Education Regulations Unrelated to Education, Safety, or Stewardship

Summary: Many federal regulations have little or nothing to do with educating students, protecting them on campus, or ensuring proper stewardship of federal funds. These requirements should be reviewed with an eye to determine whether they should be struck so that limited resources can be focused on more important efforts.

Background: Policy makers have increasingly relied on colleges and universities and, in particular, eligibility for federal student aid, as a way to pursue policy goals that are entirely outside of higher education's purview. While these goals may be desirable, the question remains whether it is appropriate to use colleges as the means to achieve them and whether the purported benefits outweigh the costs imposed on institutions and ultimately students. Although the demands of any one requirement may be modest, as a collection they divert attention and resources. Among many other examples that we could cite, the following list is representative:

Selective Service. In order to be eligible for federal financial aid, male applicants must have registered with the Selective Service before the age of 26. If there is a discrepancy in terms of whether an applicant has met the registration requirements, the burden falls on institutions to reconcile the difference. Student financial aid officers should not be tasked with enforcing this requirement.

Link between drug convictions and Title IV eligibility. Under the HEA, a student convicted of some drug offenses while receiving federal student aid can lose eligibility an unrelated broader social issue through the student financial aid process. Moreover, while drastically increasing the complexity of the application process for those individuals involved, the provision has very little impact and affects only a handful of students every year. At its core, this provision attempts to address an unrelated broader social issue through the student financial aid process. Moreover, while drastically increasing the complexity of the application process for those individuals involved, the provision has very little impact and affects only a handful of students every year.

Voter registration. Institutions are required to distribute a voter registration form, in a federally specified timeframe and format, to each student enrolled and physically in attendance at the institution. We strongly support civic participation, especially voting. However, this is an overly prescriptive requirement with a modest benefit at best.

Foreign gift reporting. Under a provision added to the HEA in 1986, institutions are required to report gifts or contracts from a foreign source (government, company, or While there may be some who take a keen interest in such donations, this information is not of widespread interest. In many cases, there are other ways to locate this information, such as through public information and open records laws.

Peer-to-peer file sharing. Colleges and universities are required to have institutional policies concerning illegal file sharing, educate students on the laws and the penalties of

such actions, and have explicit plans to combat unauthorized distribution of copyrighted for downloading music and movies, have made this requirement obsolete.

Vaccination policies. Institutions must disclose their vaccination policies in order to be about an institution's policy does not make students any safer, and is unlikely to be a consideration for any prospective students or parents when they select a college.



To Make a Report

You may use either of the following two methods to submit a report:

To submit a report online, choose a location where the violation occurred.



THE UNIVERSITY of
NEW MEXICO

UNM
HEALTH SCIENCES
CENTER

UNM
HOSPITALS

UNM
Medical Group, Inc.
University of New Mexico Physicians

UNM
Sandoval Regional
Medical Center, Inc.

OTHER

OR

Dial toll-free within the United States,
Guam, Puerto Rico and Canada
1-888-899-6092

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 10 business days, use your report key and password to check your report for feedback or questions.

EthicsPoint is NOT a 911 or Emergency Service:

Do not use this site to report events presenting an immediate threat to life or property. Reports



Our Commitment

The University of New Mexico is committed to strong values of integrity, respect and accountability at all levels. The University's policies, procedures and compliance obligations contain guidelines for conducting business with the highest standards of ethics.

The University of New Mexico fosters an environment where open, honest communications are expected. The University strongly encourages all University faculty, staff, students, community members, independent contractors and volunteers acting in good faith, to report any suspected misconduct that may be taking place at the University. The University is committed to protecting those individuals who report suspected misconduct in accordance with the Whistleblower Protection and Reporting Suspected Misconduct policy. Retaliation will not be tolerated and will be promptly investigated by the University.

The University of New Mexico wants you to feel comfortable in approaching a supervisor or management in instances where you believe violations of policies, procedures or compliance obligations have occurred. In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our written policies and procedures, as well as guidance related to policies and procedures.

The University of New Mexico has selected EthicsPoint (NAVEX Global) to provide an incident reporting system. Reports submitted through EthicsPoint will be handled timely, discreetly, and in an appropriate manner. The University will receive reported information from EthicsPoint with necessary facts being shared only with those individuals essential for the investigation and resolution of potential concerns. The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

See [EthicsPoint FAQs](#) for more information

[Follow-up on a Report](#)

COMPLIANCE AND ETHICS CONTACTS

Main Campus

ACADEMIC AFFAIRS VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Academic Misconduct</i> Unethical behavior that violates the integrity of the academic process.</p> <p><i>Other Academic Matters</i></p>	<p>EVP Academic Affairs/Provost's Office Carol Parker, Senior Vice Provost MSC05 3400 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-2611 Email: provost@unm.edu</p>
<p><i>Alcohol/Drug Abuse – (Students)</i> The misuse of both legal and illegal drugs including alcohol.</p>	<p><i>For incidents involving student violations of Alcohol/Drug Abuse contact:</i> Dean of Students Office Tomas Aguirre, Dean of Students 280 Student Services Center MSC06 3600 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-3361 Email: doso@unm.edu</p> <p><i>For incidents outside the U.S. report to:</i> Global Education Office David Wright, Associate Director for Education Abroad 2120 Mesa Vista Hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: wrightd1@unm.edu</p> <p><i>For incidents involving international students or international scholars at UNM report to:</i> Global Education Office Linda Melville, Associate Director for International Student and Scholar Services 2120 Mesa Vista hall MSC06 3850 1 University of New Mexico</p>

	<p>Albuquerque, NM 87131 Phone: 505-277-4032 Email: lmelvill@unm.edu</p>
<p><i>Cheating/Plagiarism</i> Authorized or unauthorized student usage of answers, papers, works, or projects owned or created by another individual.</p>	<p>Dean of Students Office Tomas Aguirre, Dean of Students Student Conduct Officer 280 Student Services Center MSC06 3600 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-3361 Email: doso@unm.edu</p>
<p><i>Credentials Misrepresentation</i> Theft or forgery of titles, diplomas, transcripts, grades or other official documents represented by an individual as his or her own.</p>	<p><i>For incidents of student credential misrepresentation violations contact:</i> Registrar's Office Alexander Gonzales, Registrar Student Support & Services Center MSC11 6325 1155 University Blvd. SE Albuquerque, NM 87131 Phone: 505-277-4792 Email: agonzale@unm.edu</p> <p><i>For incidents involving international students or international scholars at UNM report to:</i> Global Education Office Linda Melville, Associate Director for International Student and Scholar Services 2120 Mesa Vista hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: lmelvill@unm.edu</p>
<p><i>Hazing</i> The demeaning of a student through physical or mental means for the purpose of initiation in, or acceptance</p>	<p>Dean of Students Office Tomas Aguirre, Dean of Students 280 Student Services Center MSC06 3600</p>

<p>into a group.</p>	<p>1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-3361 Email: doso@unm.edu</p>
<p><i>Student Safety</i> An unsafe situation caused by the campus or students that would produce an insecure environment.</p>	<p>Safety and Risk Services Carla Domenici, Director MSC07 4100 1 University of New Mexico Albuquerque, NM 87131 505-277-2753 cprando@unm.edu</p> <p><i>For incidents outside the U.S. report to:</i> Global Education Office David Wright, Associate Director for Education Abroad 2120 Mesa Vista Hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: wrightd1@unm.edu</p> <p><i>For incidents involving international students or international scholars at UNM report to:</i> Global Education Office Linda Melville, Associate Director for International Student and Scholar Services 2120 Mesa Vista hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: lmelvill@unm.edu</p>
<p><i>Student Travel</i> Inadequate preparation for school sponsored travel excursions resulting in the potential for injury, death, illness or hazard.</p>	<p><i>For domestic travel report to:</i> Safety and Risk Services Carla Domenici, Director MSC07 4100 1 University of New Mexico Albuquerque, NM 87131 505-277-2753</p>

	<p>cprando@unm.edu</p> <p><i>For international travel report to:</i> Global Education Office David Wright, Associate Director for Education Abroad 2120 Mesa Vista Hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: wrightd1@unm.edu</p> <p><i>For incidents involving international students or international scholars at UNM report to:</i> Global Education Office Linda Melville, Associate Director for International Student and Scholar Services 2120 Mesa Vista hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: lmelvill@unm.edu</p>
ACCOUNTING & FINANCIAL VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Accounting and Auditing Matters</i> The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices.</p> <p><i>Falsification of Contracts, Reports or Records</i> Falsification of records, failure to complete and file reports required by law to governmental agencies.</p> <p><i>Fraud</i> The intentional misrepresentation or concealment of information in order to deceive, mislead, or acquire something of value. A fraud is an intentional deception perpetrated to secure an unfair gain.</p>	<p>Internal Audit Manu Patel, Director 1801 Roma NE MSC05 3170 1 University of New Mexico Albuquerque, NM 87131-0001 Phone: 505-277-2244 Email: iaudit@unm.edu</p>

<p><i>Improper Disclosure of Financial Records</i> Careless, unlawful or fraudulent conduct in recording, preparing, reporting, disclosing of the value or content of Financial Records.</p> <p><i>Theft/Embezzlement</i> The act of stealing. To appropriate property entrusted to one's care fraudulently to one's own use.</p> <p><i>Waste, Abuse or Misuse of Institution Resource</i> Improper or unauthorized use of the institution's resources and technologies for personal gain.</p> <p><i>Other Financial Matters.</i></p>	
<p><i>Donor Stewardship</i> Mishandling of Donor funds directed to the institution.</p> <p><i>Improper Giving or Receiving of Gifts</i> The giving, receiving, or solicitation of items which could be reasonably interpreted as an effort to influence a business relationship or decision.</p>	<p>UNM Foundation Two Woodward Circle 700 Lomas NE, Suite 108 Albuquerque, NM 87102 Phone: 505-277-4503 Email: marcom@unmfund.org</p>
<p><i>Improper Supplier or Contractor Activity</i> Supplier or contractor activity in violation of the institution's policies and procedures.</p>	<p>Purchasing Bruce Cherrin, Chief Procurement Officer Perovich Business Center 1700 Lomas Blvd, Suite 2600 MSC01 1240 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-1740 Email: cherrin@unm.edu</p>
ATHLETICS VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Fraudulent Activities</i> Fraudulent Activities designed to influence the outcome of sports activities.</p> <p><i>Improper Giving or Gifts</i> Giving, receiving or solicitation of items which could be reasonably interpreted as an effort to influence a recruiting</p>	<p>Athletics Compliance Janice Ruggiero, Sr. Associate Athletic Director MSC11 6340 1 University of New Mexico Albuquerque, NM 87131-0001 Phone: 505-277-5067 Email: ruggiero@unm.edu</p>

<p>decision.</p> <p><i>Inappropriate Activities</i> Interaction of consultants with student athletes off or on the field.</p> <p><i>Misuse of Assets, Players or Endorsements</i> Use of college sports equipment, uniforms or any other items owned by the institution for personal activities. Improper talent scout activity.</p> <p><i>Recruiting Misconduct</i> Phone calls or unauthorized visits outside the recruiting periods, undue duress or influence from alumni, recruiting players outside amateur status.</p> <p><i>Scholarship/Financial Aid Misconduct</i> Falsifying entrance or placement exams, improper inducement of benefits or financial aid. Unusual treatment for one player and not for others in loans. Arranging for fraudulent academic credit or falsification of transcripts.</p> <p><i>Substance Abuse</i> Substance abuse is defined as the misuse of both legal and illegal drugs including alcohol.</p> <p><i>Other Athletic Matters</i></p>	
CHILD ABUSE VIOLATIONS	RESPONSIBLE DEPARTMENTS
<p>If you have knowledge of child abuse or neglect in progress you should notify Local Law enforcement or 911 immediately. "Child Abuse" includes acts which seriously endanger the physical, mental or emotional health and safety of a child. "Child" means a person under 18 years of age.</p>	<p>Emergency Service: 911</p> <p>UNM Campus Police Emergency: 911 Non-Emergency: 505-277-2241</p> <p>Children, Youth and Families Dept. Hotline Report Abuse or Neglect: 1-855-333-7233 or #SAFE from your cell phone</p>
CONFLICTS OF INTEREST VIOLATIONS	RESPONSIBLE DEPARTMENTS
<p><i>Conflict of Interest in Academic Affairs</i> Concerns related to violations of conflict of interest policies governing Academic Affairs.</p>	<p><i>For incidents involving Conflict of Interest in Academic Affairs contact:</i> EVP Academic Affairs/Provost's Office Carol Parker, Senior Vice Provost</p>

<p><i>Conflict of Interest in Financial</i> Concerns related to violations of Conflict of Interest Policies governing Finance.</p> <p><i>Conflict of Interest in Research</i> Concerns related to violations of conflict of interest policies governing researchers.</p> <p><i>Other Conflict of Interest Matters</i></p>	<p>MSC05 3400 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-2611 Email: provost@unm.edu</p> <p><i>For incidents involving Conflict of Interest in Financial contact:</i> Financial Services Division Liz Metzger, University Controller Perovich Business Center Suite 3100 MSC01 1300 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-5111 Email: emetzger@unm.edu</p> <p><i>For incidents involving Conflict of Interest in Research contact:</i> Office of Research Compliance Carlos Romero, AVP Research and Compliance 1805 Sigma Chi NE MSC02 1665 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-5358 Email: crom@unm.edu</p> <p><i>For incidents involving Other Conflict of Interest Matters contact:</i> Compliance Office – Main Campus Helen Gonzales, Chief Compliance Officer Student Support and Services Center, Suite 1150 MSC11 6300 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-272-7252 Email: compliance@unm.edu</p>
EQUAL OPPORTUNITY VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Disability Issues</i> Qualified individuals with disabilities are</p>	<p>Office of Equal Opportunity Jeanne Marquardt, Interim Director</p>

<p>protected under University policy, and state and federal laws and regulations, including ADA. Reasonable accommodation must be given to the known physical or mental limitations of a qualified individual with a disability.</p> <p><i>Harassment or Discrimination</i> Uninvited and unwelcome verbal or physical conduct directed at someone because of his or her sex, religion, ethnicity or beliefs. Use of retaliation or retribution.</p> <p><i>Hate/Bias</i> A speech, act, or harassing action that targets, threatens, or attacks an individual or group because of their actual or perceived race, color, national origin, ethnicity, religious affiliation, sex, gender identity, disability, or sexual orientation.</p> <p><i>Other Equal Opportunity Matters</i></p>	<p>609 Buena Vista Dr. NE MSC05 3150 1 University of New Mexico Albuquerque, NM 87131 Phone:505-277-5251 Email: oeounm@unm.edu</p>
HUMAN RESOURCES VIOLATIONS	RESPONSIBLE DEPARTMENTS
<p><i>Employee Misconduct</i> Employee conduct that is in violation of the institution’s policies.</p> <p><i>Nepotism</i> Patronage bestowed by the public officers in consideration of a family relationship and not merit.</p> <p><i>Offensive or Inappropriate Communication</i> Use of inflammatory, derogatory, unduly critical or insulting communication.</p> <p><i>Threat or Inappropriate Supervisor Directive</i> Improper use of supervisory authority in response to employee taking action or refusing to take action. Inappropriate management practices.</p> <p><i>Time Abuse</i> Improper and/or excessive use of work time for personal business. Concerns</p>	<p><i>For incidents involving Human Resources Staff violations contact:</i> Human Resources Dorothy Anderson, Vice President Human Resources MSC05 3345 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-5824 Email: unmvphr@unm.edu</p> <p><i>For incidents involving Human Resources Faculty violations contact:</i> Office of Faculty Affairs and Services Theresa Ramos, Interim Director Faculty Employment and Services MSC05 3400 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4528</p>

<p>about falsifying work hours. <i>Unsafe Working Conditions</i> Failure to meet requirements needed to perform all duties in a secure environment. Potential areas of harm. <i>Violence or Threat</i> An expression of the intention to inflict evil, injury, or damage to a person or their property. <i>Workers Compensation or Disability Benefits Abuses,</i> Observation of physical activity of employees receiving disability or other compensation benefits in contradiction to the degree of disability certified by medical personnel.</p> <p><i>Other Human Resources Matters.</i></p>	<p>Email: faculty@unm.edu</p> <p><i>For incidents involving Unsafe Working Conditions contact:</i> Safety and Risk Services Carla Domenici, Director MSC07 4100 1 University of New Mexico Albuquerque, NM 87131 505-277-2753 cprando@unm.edu</p>
INFORMATION TECHNOLOGY VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Data Privacy/Integrity</i> Refers to the technical, contractual, administrative and physical steps taken to protect against unauthorized access to and disclosure of personally identifiable data. <i>Malicious/Inappropriate Use of Technology</i> Use of Information Technology that violates policy. <i>Misuse of Resources</i> Improper or unauthorized use of institution resources for personal gain. <i>Software Piracy/Intellectual Property Infringement</i> Unauthorized use of copyrights or software. <i>Other Information Technology Matters.</i></p>	<p>Information Technology Gil Gonzales, Chief Information Officer MSC05 3347 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-8125 Email: cio@unm.edu</p>
RESEARCH VIOLATIONS	RESPONSIBLE DEPARTMENT
<p><i>Data Privacy</i> Refers to the technical, contractual, administrative and physical steps taken</p>	<p><i>For incidents involving Research violations contact:</i> Office of Research Compliance</p>

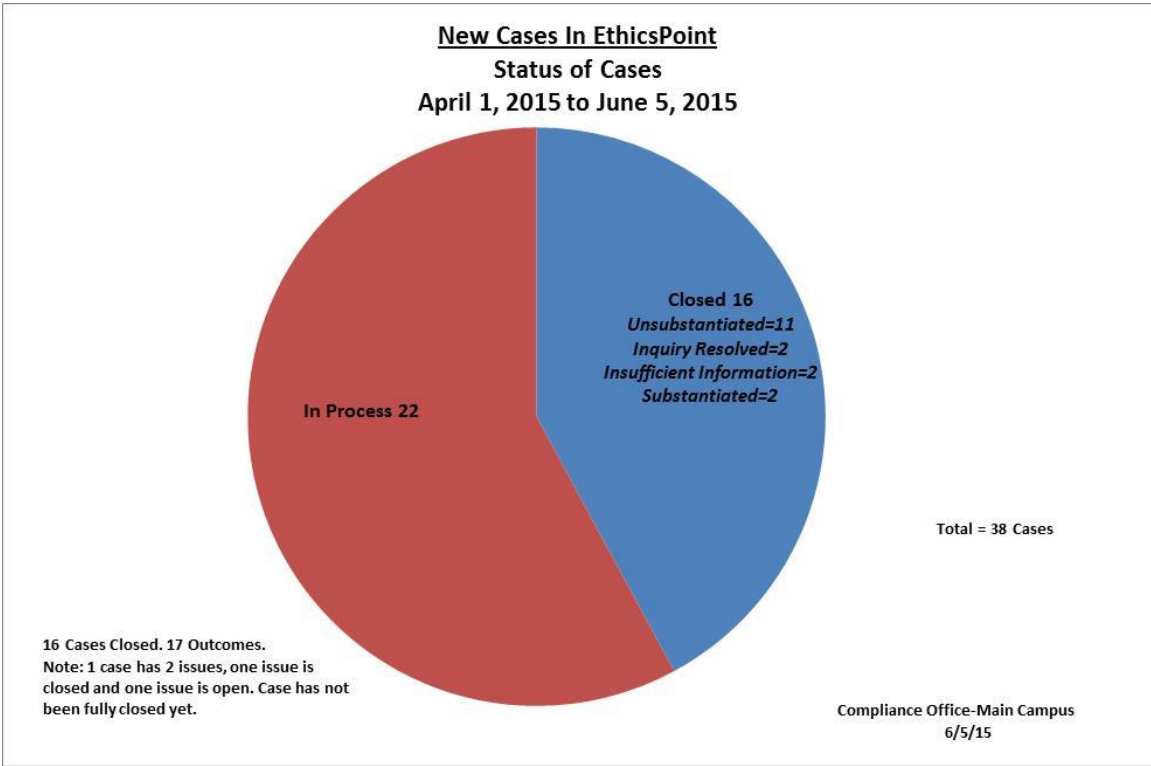
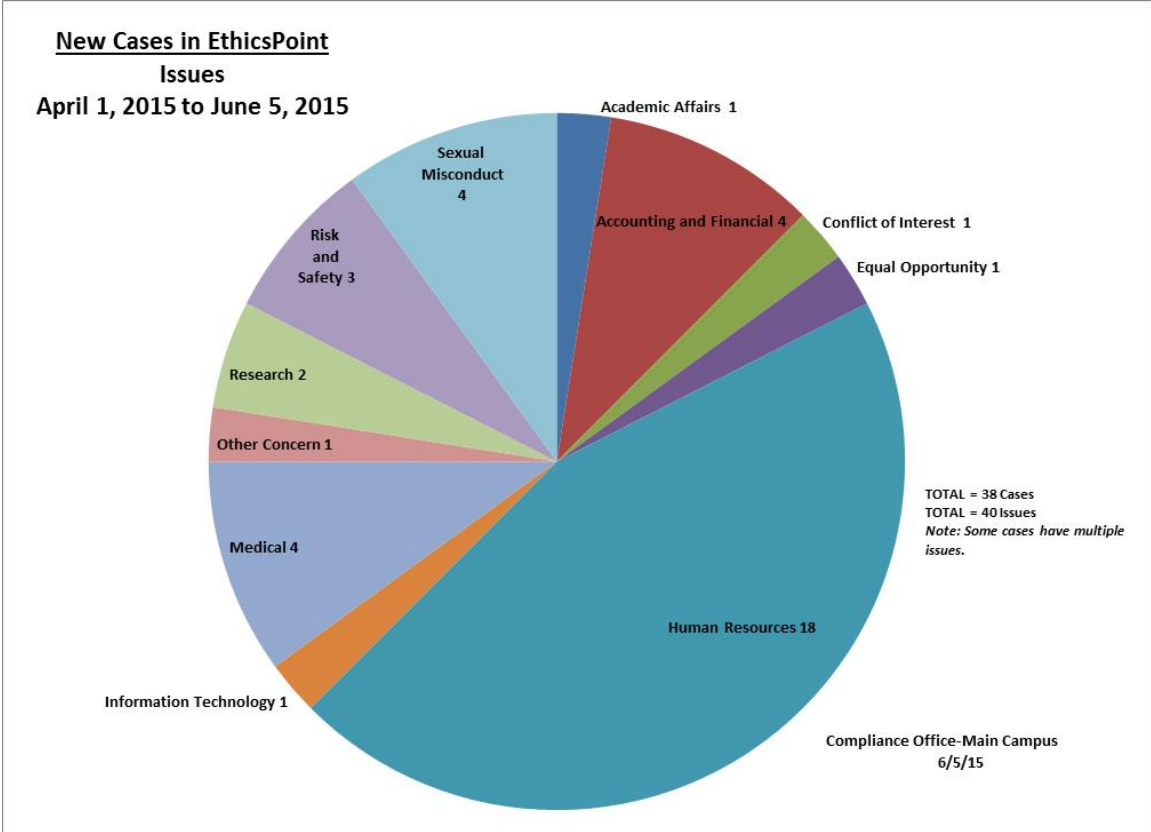
<p>to protect against unauthorized access to and disclosure of personally identifiable data.</p> <p><i>Environmental and Safety Matters</i> Failure to meet the requirements of any applicable law, rule or regulation relating to the environment, working conditions or workplace safety.</p> <p><i>Fraud</i> The intentional misrepresentation or concealment of information in order to deceive, mislead, or acquire something of value.</p> <p><i>Intellectual Property Infringement, Misappropriation or Disclosure</i> Any unauthorized or inappropriate use, misappropriation or disclosure of confidential information or intellectual property belonging to the institution or any the institution’s customer, supplier, or business partner, including any intellectual property protected under any U.S. or other laws relating to copyrights, patents, or trade secrets.</p> <p><i>Research Grant Misconduct or Misappropriation of Costs</i> Unallowable or questionable expenditures or cost transfers to government grants, contracts or other agreements.</p> <p><i>Scientific Misconduct</i> Fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research.</p> <p><i>Other Research Matters.</i></p>	<p>Carlos Romero, AVP Research and Compliance 1805 Sigma Chi NE MSC02 1665 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-5358 Email: crom@unm.edu</p> <p><i>For incidents involving international students or international scholars at UNM report to:</i> Global Education Office Linda Melville, Associate Director for International Student and Scholar Services 2120 Mesa Vista hall MSC06 3850 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-4032 Email: lmelvill@unm.edu</p>
<p>RISK AND SAFETY MATTERS VIOLATIONS</p>	<p>RESPONSIBLE DEPARTMENT</p>
<p><i>Environmental and Safety Matters</i> Failure to meet the requirements of any applicable law, rule or regulation relating to the environment, working</p>	<p>Safety and Risk Services Carla Domenici, Director MSC07 4100 1 University of New Mexico</p>

<p>conditions or workplace safety. <i>Public Safety</i> Safety and Health of the University Community. <i>Sabotage or Vandalism</i> Destruction of property or the hindering of work by discontented workers. <i>Unsafe Working Conditions</i> Failure to meet requirements needed to perform all duties in a secure environment. <i>Other Risk and Safety Matters</i></p>	<p>Albuquerque, NM 87131 505-277-2753 cprando@unm.edu</p>
SEXUAL MISCONDUCT VIOLATIONS	RESPONSIBLE DEPARTMENTS
<p>(For Faculty, Staff, Students) The making of unwanted and offensive sexual advances or of sexually offensive remarks or acts. Includes Title IX or Clery issues.</p>	<p><i>For incidents of Title IX violations contact:</i> Office of Equal Opportunity Heather Cowan, Interim Title IX Coordinator 609 Buena Vista Dr. NE MSC05 3150 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-5251 Email: oeounm@unm.edu</p> <p><i>For incidents of Sexual Misconduct or Clery Act violations contact:</i> UNM Campus Police Christine Chester, Interim Clery Coordinator, Deputy Police Chief 2500 Campus Blvd. NE MSC02 1540 1 University of New Mexico Albuquerque, NM 87131 Phone: 505-277-1934 Email: cchester@unm.edu</p> <p><i>For incidents of Sexual Misconduct violations contact:</i> Dean of Students Office Tomas Aguirre, Dean of Students 280 Student Services Center MSC06 3600 1 University of New Mexico Albuquerque, NM 87131</p>

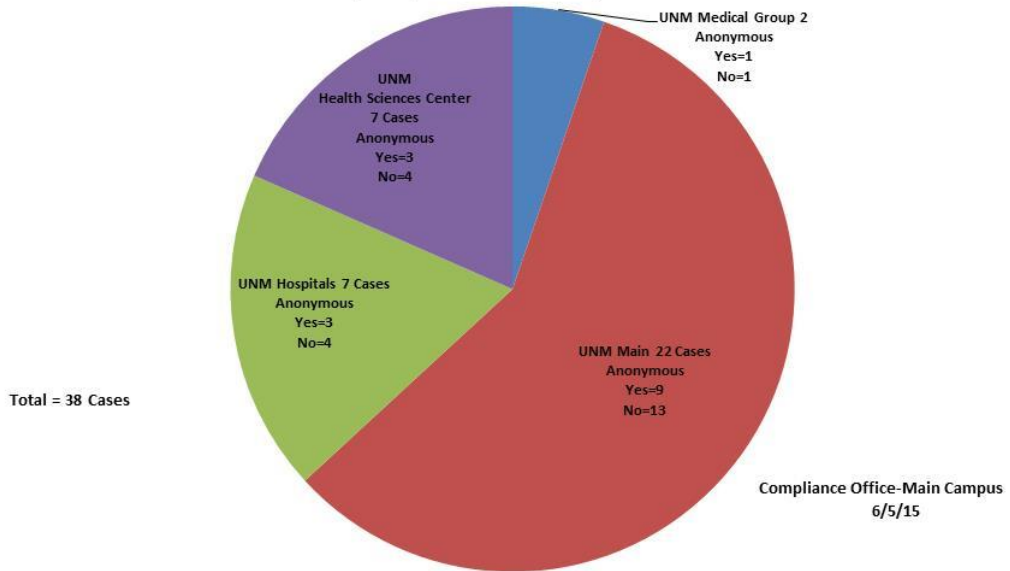
Phone: 505-277-3361
dos@unm.edu

*For confidential reporting of incidents of
Sexual Misconduct violations contact:*

Women's Resource Center
Summer Little, Director
MSC06 3910
1 University of New Mexico
Albuquerque, NM 87131
Phone: 505-277-3716
Email: salittle@unm.edu



New Cases in EthicsPoint
Locations/Anonymous
April 1, 2015 to June 5, 2015



Follow Up Report - Recommendation Implemented (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Recommendation Action	Actual Implementation Date	Responsible Party
2013-11	UNM Medical Group	<u>Recommendation 2 - Research Park Act</u>	The University Office of Government and Community Relations should work with UNMMG management to propose necessary amendments to University Research Park Act during the 2015 sixty day legislative session.	The UNM Office of Government and Community Relations will work with the HSC Leadership, Council of the University Presidents to propose legislative amendments to the University Research Park and Economic Development Act during the 2015 legislative session.	6/14/2015	UNM Office of Government and Community Relations consulted with the NM Secretary of State's office and determined that the Research Park Act should not be changed, but instead the UNMMG should submit its annual report to the Secretary to fulfill the provision of the Act. UNMMG has been notified of this requirement.	5/18/2015	Connie Beimer, Government Relations officer
2015-14	Cancer Center Portable Devices	<u>Recommendation 7 - Complaint Specific Conclusion</u>	The Chief Financial Officer of the CC should formally assign the responsibility of managing portable devices, determining potential loss, managing the investigative process, reporting to the HSC Privacy Officer, and communicating the outcome to designated individuals at the CC as appropriate. The person responsible for overall oversight should develop written standard operating procedures for the process, communicate the standard operating procedures to all staff, and require annual training in compliance with HSC Policy 300.	UNM Cancer Center will initiate a process to ensure that staff are current on their required annual training supporting the handling of protected information such as HIPAA information. UNMCC will initiate a process to develop and train our staff on standard operating procedures for communicating and reporting incidents to the appropriate levels of authority in the institution. UNMCC has a dedicated Compliance Officer who maintains the responsibility for managing the investigative process, coordinating communication within UNMCC, and reporting to the HSC Privacy Officer.	4/1/2015	Cancer Center informed they have included a training segment as part of the UNMCC new Employee Orientation. They have also developed a "Management and Security Devices Procedure" and are continuing to include review of completed HIPAA courses during the annual performance review process.	5/27/2015	RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2014-15	CASAA Time Abuse	<u>Recommendation 2 - Laptop Tagging Concerns</u>	The Director of CASAA should: Require that CASAA staff are provided with proper directions in the preparation of laptop distribution papers by instructing employees to record consistent and correct laptop serial numbers. Ensure that all laptops that are retained for staff use are properly tagged for inventory purposes. Ensure that all laptops that are checked out to former UNM employees are returned to CASAA. Promptly transfer \$10,602 off the RBS grant in order to ensure that the University of New Mexico demonstrates to the granting agency that once we became aware of inappropriate expenditures they were quickly transferred off the grant. Address personnel issues and appropriate disciplinary actions for The Professor of Health Communication/Senior Scientist in accordance with C07: Faculty Disciplinary Policy of the Faculty Handbook.	I agree with this audit finding. Planned corrective actions: (a) reinstitute use of laptop distribution form created by the Facilities Coordinator, require use of this form for all laptops used as research incentives, and require a photograph of the back of the laptop to be attached to the laptop distribution form; (b) have Facilities Coordinator maintain records of all laptops to be used as research incentives, reconcile distribution during annual inventory process, and provide inventory tags for laptops not distributed; (c) request that laptop from former employee be returned (request sent 10-6-14); (d) move \$10,602 to unrestricted index (completed 10-2-14); (e) CASAA Director to consult with Senior Vice Provost about appropriate response under the Faculty Disciplinary Policy and then implement appropriate discipline. Also require that the Professor of Health Communication/Senior Scientist retake the UNM PI training program.	3/31/2015	CASAA has provided a laptop distribution form and procedures, evidence that the former employee returned the outstanding laptop, transferred the \$10,602 from the grant index, and had a performance discussion with the Professor of Health Communication/Senior Scientist. CASAA has provided documentation that the Professor of Health Communications attended PI training on 03/25/15.	5/27/2015	Barbara McCrady, Director
2014-15	CASAA Time Abuse	<u>Recommendation 4 - The Professor of Health Communication/Senior Scientist Travel Concerns</u>	The Director of CASAA should: a. Instruct CASAA employees not to use University funds for advances, loans or any other types of purchases for personal benefit. b. Address personnel issues and appropriate disciplinary actions for the Professor of Health Communication/Senior Scientist in accordance with C07: Faculty Disciplinary Policy of the Faculty Handbook.	I agree with this audit finding. Planned corrective actions: (a) review of University policies 4000 and 4030 with CASAA Program Directors and Principal Investigators and distribute policy to all CASAA employees; (b) CASAA Director to consult with Senior Vice Provost about appropriate response under the Faculty Disciplinary Policy and then implement appropriate discipline. Also require that the Professor of Health Communication/Senior Scientist retake the UNM PI training program.	3/31/2015	CASAA distributed policies 4000 and 4030 to employees on 2/18/15. CASAA employees reviewed Internal Audit findings and the CASAA implementation plan on 11/4/14. The CASAA director had had a performance discussion with the Professor of Health Communication/Senior Scientist. The Professor of Health Communication/Senior Scientist attended PI training on 03/25/15.	5/27/2015	Barbara McCrady, Director

Follow Up Report - Recommendation Implemented (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Recommendation Action	Actual Implementation Date	Responsible Party
<u>2015-02</u>	<u>UNM Taos</u>	<u>Recommendation 5 - Reimburse UNM Taos PPD from Non-Endowed Gift Funds</u>	The UNM-Taos Business Manager should reimburse the UNM-Taos Physical Plant Department for improvements to the Fine Art's HVAC system, which should have been charged to the non-endowed gift intended for these purposes.	With the matter now considered resolved, the UNM-Taos Business Manager will transfer the unexpended balance to Physical Plant to reimburse for HVAC installation and repair. The Wilder-Green index will be closed out.	3/31/2015	Journal Voucher #J0477746 was created and approved on 3/12/2015 to move the remaining balance from the Art Fund to Physical Plant. Internal Audit reviewed the JV and Fine Arts' operating ledger to verify that the JV moved the \$7,250 balance from the Fine Arts' index to the PPD Maintenance index.	5/21/2015	Catherine O'Neill, Executive Dir,Br Campus; Thomas Duran, Business Manager

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2013-29	<u>Review of College of Education Operations</u>	<u>Recommendation 11 - Required University Training</u>	The Dean of the College of Education should work with the Office of the Provost and the Human Resources Department to ensure that all faculty and staff take the University's required annual training.	The new dean with the help of the COE Academic Operations Officer will request regular reports from HR of mandatory training completion statistics and then implement regular communications with Faculty and Staff to ensure that all faculty and staff comply with the required annual University training. Consequences will be implemented for those faculty and staff within the COE that do not comply.	12/31/2014	Fall 2014 - COE sent College-wide correspondence notifying faculty and staff of training requirements. Email and phone call with Susan R 1/27/2015 - COE follows the UNM deadline for required training which is 1/31/2015. IA to run report and analysis to evaluate compliance. 2/17/2015 – Internal Audit performed an analysis on faculty and staff required training and found that the College was not in compliance with policy for 2014. Therefore, the finding will remain past due until January 2016, when the calendar year 2015 training is verified.		Salvador Hector Ochoa, Dean; Susan Rhymer, Finance Officer
2013-10	P-Card	<u>Recommendation 2 - Implementation of new system to record and track hazardous chemicals and radioactive materials</u>	The Purchasing department and SRS should implement a system which effectively records the purchase of hazardous materials and radioactive materials, and provides all relevant information to SRS for tracking.	SRS purchased the Enterprise Re-Agent Manager (ERM) software and is implementing this software in five UNM Departments effective August 2013. This ERM software will replace ICID. ERM is a SciQuest Product that communicates with Banner. Purchasing and SRS are working as a team to populate the ERM software with data from Chemical and Research Laboratory Supplies (CRLS). SRS established a main campus Chemical and Laboratory Safety Committee and is working with the committee to attempt to implement ERM campus-wide. SRS needs the support of UNM management to promulgate policies to require the use of ERM software and the inventory of chemical and radioactive materials.	7/1/2015			Carla Domenici, Int Dir, Safety & Risk Services
2013-01	<u>Review of College of Arts and Sciences Operations</u>	<u>Implementation of Process to Track Research Activities</u>	A process should be implemented that enables colleges to effectively track and monitor time that faculty members spend on research activities to help management determine if faculty members are meeting academic load requirements and workload guidelines.	To track faculty research activities, an RFP was created for the purchase of a scholarly productivity subscription service, which will have the ability to track faculty research activities. The products of three vendors responding to the RFP are being evaluated Fall 2014, and a decision on purchase is expected to be made by January 1, 2015. Actual implementation of the software is expected to be completed by December 15, 2015.	12/15/2015	Initial plans to implement a process for tracking faculty research could not be completed due to budget restraints for purchasing software for scholarly productivity subscription service, which has the ability to track faculty research activities. Instead, the Provost office will pull faculty research activities data together from available public sources such as Google Scholar.		Greg Heileman, Associate Provost; Chaouki Tanios Abdallah
2013-15	<u>Safeguards for Protecting Private Data- Service Providers and Contractors</u>	<u>Recommendation 1 - UNM Information Security Program</u>	The CIO needs to implement the UNM Information Security Program University-wide.	Concur. The CIO will continue implementation of the Information Security Program with the advisory structure approved by the President. The CIO submitted a recommendation to the IT Governance Council UNM Policy 2560 (President, EVPs, and Chancellor) to create a University wide security council. The existing and operational UNM Information Security Program will be assigned to the appropriate advisory structure.	6/30/2015	IT Executive Governance has been considering options to revise the advisory and governance structures. Advice from the Kurt Salmon Information Technology consultation anticipated this quarter may inform those options and the decision.		Gilbert Gonzales, Chief Information Officer

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2013-15	<u>Safeguards for Protecting Private Data-Service Providers and Contractors</u>	<u>Recommendation 2 - University Information Security Function</u>	The President should give the CIO the explicit authority and responsibility to manage information security University-wide, including the decentralized computing services. The President should also ensure that the CIO has the budget to develop, implement, and enforce security policies.	Concur. The President's Office is working with the EVP for Administration, the Provost and EVP for Academic Affairs, and the Chancellor for Health Sciences on the appointment of an appropriate advisory structure. We will work with the EVP for Administration and the CIO to evaluate whether this office has sufficient budget and authority to develop, implement, and enforce security policies. The Information Security Office, through the CIO, has established a security management reporting mechanism and makes quarterly reports to senior management on the status of information security at UNM.	7/31/2015	UNM has engaged an international management consulting firm to perform a high-level review of all main campus IT services, departmental and enterprise. The project will include a document review, interviews, and a campus-wide survey. Recommendations will focus on: a) Operational efficiencies, b) "Common Good" IT services, and c) UNM IT Governance. The Office of the CIO will facilitate the review along with a small group of executive stakeholders. The review is anticipated to start in the immediate future and is to be completed this calendar year. Recommendations will be received in FY2015.		Gilbert Gonzales, Chief Information Officer
2013-29	<u>Review of College of Education Operations</u>	<u>Recommendation 2 - Evaluate endowment expenditures and award activity</u>	The College, including its scholarship committee, should evaluate endowment expenditure and award activity to ensure endowment spending distributions and available reserves are optimally utilized, and to communicate availability of scholarships to chairs and students. In addition, the College should work with the UNM Foundation to lift certain donor imposed restrictions that are hard to meet by COE scholarship applicants.	The College will analyze existing scholarships to maximize awards, including partnering with the UNM Foundation to ease donor-imposed restrictions where appropriate. This should be done in preparation for the FY16 award cycle which culminates in April, 2015.	5/1/2015			Salvador Hector Ochoa, Dean; Susan Rhymer, Finance Officer
2013-29	<u>Review of College of Education Operations</u>	<u>Recommendation 3 - Time to acquire a degree at UNM COE</u>	The Dean of the College of Education should work with Office of the Provost to ensure any redesign of the College addresses the Provost's recommendation for reducing minimum credit hours for degree programs.	A college-wide Curriculum Review has been underway since 2013; one objective of the review is to reduce the required number of credit hours in each bachelor degree program to 120 hours, or close to it. The NM PED requires 57 credit hours in core courses for teacher preparation programs. The PED is reviewing this requirement. The Early Childhood Education program (ECE) is well under way to restructuring the program into a 5 year degree program, and in compliance with regulatory and accreditation agencies.	6/30/2016			Salvador Hector Ochoa, Dean
2013-29	<u>Review of College of Education Operations</u>	<u>Recommendation 4 - Excess student credit hours</u>	The Provost should work with the Interim Dean of the College to become more involved in prospective COE enrollees earlier in their college career, and endeavor to provide critical advisement to COE students as early in the process as possible. The Provost office should also work with the College to determine if excessive student credit hours are occurring before, or after, being admitted to the College.	Advisors will be shifted from University College to the College of Education so that the COE may take on the responsibility for advising their students as early in the process as possible. The departments are reviewing through the Dean their curricula and modifying it in the hope of reducing excess student credit hour accumulation. There is an impediment related to NM teacher licensure that we cannot address without collaboration with PED. Many of the excess credit hours are attributable to their requirements.	8/31/2015	Received a revised status update with the new Dean's estimated completion date of 8/31/2015.		Salvador Hector Ochoa, Dean; Greg Heileman, Associate Provost
2013-29	<u>Review of College of Education Operations</u>	<u>Recommendation 5 - Data Analysis Issue</u>	The Provost's Office and the College should explore data reporting alternatives to the first-time fall freshmen data reporting. Internally, the University should track spring semester freshman, summer session freshman, and transfer student starts so that a more complete picture of individual college's metrics can be obtained.	The Academic Affairs office accepts responsibility and will implement the recommendation. We will continue to work to create metrics for these reports (already underway), and spreadsheets of data in Excel format for displaying them in an on-line format that departments can access directly.	5/31/2015	3/12/2015 According to the Provost, a data tracking system for the entire University has been implemented, effective February 2015. They are in the process of validating data and will present the information to the next Academic/Student Affairs committee meeting in April. The implementation was extended to May 31, 2015.		Greg Heileman, Associate Provost

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2013-29	Review of College of Education Operations	Recommendation 6 - Residency School	The Dean of the COE and the Provost office should consider developing a College of Education Teacher Preparation Residency School. Such a residency school could provide COE students with hands on training throughout their teacher preparation experience.	The College of Education will consider the Teacher Preparation Residency School as a part of the continuing re-imagining efforts and future direction of the College.	8/31/2016			Salvador Hector Ochoa, Dean
2013-29	Review of College of Education Operations	Recommendation 7 Field Services Assessments	The College should consider establishing a coordinated clinical field service assessment program to effectively provide feedback while teacher candidates are conducting field service and to follow up with them after graduation. Consider changes in programs to include student field service experience earlier in the program/student experience and establish a program to assess the effectiveness of traditional field service.	The College established a Field Services Portal (the first of its kind in NM) for feedback between teacher candidates and supervisors during the entire field service experience. This portal undergoes continuous improvement to facilitate and enhance feedback and communication with candidates, staff and supervisors. The College also utilizes the TK-20 assessment system to collect observations on students' learning and can be accessed by our alumni to store their teaching and learning dossiers. In addition, the Center for Education Policy Research is conducting a separate program evaluation of the Co-Teaching Collaborative model as part of its two-year pilot program (FY14 and FY15). FY14 is the first year for which this type of data is being gathered.	8/31/2016	New Dean of COE requested additional time to implement since he just started at UNM on 7/15/2014. Implementation date was extended to 8/31/2016.		Salvador Hector Ochoa, Dean
2013-29	Review of College of Education Operations	Recommendation 8 - Expand Field Service to Rural NM	The Dean of the COE should work with the Provost's Office to develop a permanent funding model for field service, and explore expansion of the Co-Teaching Collaborative School model within the Teacher Education Department, to other departments within the College, and to rural areas of New Mexico.	The new COE Dean and the Provost will explore funding possibilities for Field Services, and further examine possibilities for expanding the Co-Teaching Collaborative School model in Teacher Education and other areas of the college. Rural areas of New Mexico will also be included.	8/31/2016			Salvador Hector Ochoa, Dean
2013-29	Review of College of Education Operations	Recommendation 9 - UNM School Turnaround Program	The Dean of the College of Education should work with the Provost's Office and the Office of Government and Community Relations to pursue options for funding for the College's school turnaround programs, including but not limited to: the New Mexico legislature, the U.S. Department of Education, NM PED, private foundations, and collective funding initiatives in the school districts.	Collaboration is underway with other New Mexico institutions of higher education, including New Mexico State University.	6/30/2015	New Dean of COE requested additional time to implement since he just started at UNM on 7/15/2014. Implementation date was extended from 5/31/2014 to 06/30/2015.		Salvador Hector Ochoa, Dean
2014-08	IT Ticketing	Recommendation 6A - Information Technology General Controls	The Director of Ticketing Services should complete and implement key IT general controls procedures.	We concur. Procedures will be completed and implemented.	6/30/2015	Ticketing Services and UNM IT are working together to implement key IT general controls by June 2015.		Mark Koson, Assoc Athletic Dir/Ticket Svcs
2014-12	Office of Vice-President for Research	Recommendation 1 - Deficit Reduction Plan - Reasonable payback period	The University President should consider working with each of the Deans to review their current operations and determine if there is any possibility of shortening the payback periods.	The President will direct Provost Abdallah to work with VPR Dougher and EVP Harris to provide a plan by June 30, 2015 for eliminating the deficits in the CHTM and CARC budgets. The plan will address reduction of the payback period.	6/30/2015			David Harris, EVP for Adm; Chaouki Tanios Abdallah, Provost

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2014-12	<u>Office of Vice-President for Research</u>	<u>Recommendation 2 - Sevilleta - Future Funding</u>	The University President should consider working with the Dean of Arts and Sciences to assess the viability of funding for Sevilleta, and to determine how best to address funding availability for the aging facility if they are in need of emergency repairs.	The President will direct the Provost to work with the A&S Dean to develop a plan by March 1, 2015 that addresses both deficit reduction and viability for the Sevilleta Field Station.	11/30/2015	Per the Dean of College of Arts and Sciences, a new Chairman of Biology will be starting August 1, 2015. It is in the best interest to wait for that chair to be on board and develop the plan. An extension was requested and granted to 11/30/15.		Mark Peceny,Dean; Chaouki Tanios Abdallah, Provost
2014-12	<u>Office of Vice-President for Research</u>	<u>Recommendation 3 - Designation of Start up reserves</u>	Deans of all Colleges, Departments, and Centers should enforce UNM Reserve policy UBP 7000: Categorization of Reserves by designating start-up reserves as either "Committed" or "Dedicated."	Response from the Dean of the School of Engineering: An email to departments instructing them to categorize all faculty start-up funds as committed was sent 08/13/14. Once the Categorization of Reserves is completed, a review will be done to confirm that instructions were followed. Response from the Dean of the College of Arts and Sciences: The College will inform all departments and programs that start-up funding promised to faculty members via Letters of Offer will be considered committed in the UAP 7000 Categorization of Reserves. This will be practiced at all levels from department and program level up to the Dean's level.	8/31/2015	Partially Resolved: Internal Audit reviewed the UAP 7000: Categorization of Reserves report and all School of Engineering start-up reserves have been designated as "Committed" for FY 2015. The College of Arts and Sciences start-up reserves were reported as discretionary for FY 2015 and were not dedicated as recommended by Internal Audit. The College is unable to reclassify the reserves from discretionary to dedicated because the budget system for reserve designations is locked until FY 2016. The College intends to designate all start-up reserves as dedicated for FY 2016. The College has requested an extension date of August 31, 2015 for its corrective action.		Financial Analyst, School of Engineering; Financial Officer, College of Arts and Sciences.
2014-10	<u>UNM Children's Campus</u>	<u>Recommendation 2 - Develop Plan for Annual Deficits</u>	UNMCC should develop a plan to identify causes of the annual deficits, submit a plan for resolving the causes of the deficit, and submit follow-up reports to the Vice President for Student Affairs showing the progress being made to reduce the deficit.	The UNM Children's Campus agrees with the recommendation to develop a plan to identify causes of the annual deficits and submit a plan for resolution of the deficit under University Administrative Policy (UAP) 7000. Identify over and under expenditures for fiscal years 2012-2014 and determine whether they were one time or reoccurring expenses. Evaluate revenue for fiscal years 2012-2014 as it relates to Children's Campus enrollment. Deficit reduction measures will continue to be implemented as outlined in the Children's Campus UAP 7000 report.	7/31/2015			Daniela Marysol Baca,Dir,Child Care Center
2014-10	<u>UNM Children's Campus</u>	<u>Recommendation 7 - UNMCC Proposed Expansion</u>	The demand for access to quality childcare at UNM is constantly growing. The University should consider expanding the UNMCC to meet the needs of this segment of its student and staff population. The University should work with the Budget Office to assess the availability of funding for the proposed expansion of the UNMCC.	The AVP for Student Life agrees with the recommendation that the University should consider expanding the UNMCC to meet the needs of this segment of its student and staff/faculty population. The AVP for Student Life will coordinate with the Provost's Office to prioritize this project in the context of main campus capital priorities. The challenge will be assessing the need for expansion of the UNMCC against academic priorities relative to available state, institutional and private funding sources.	7/31/2015			Walter Miller,Assoc VP,Student Life

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 1 - Incident Log</u>	The Chief Financial Officer of the CC should ensure that they develop a comprehensive log for reporting any missing portable devices. The log should include, at minimum, the date of discovery, the description of the item, the reporting party, and a running description of action taken through to the disposition. The Chief Financial Officer of the CC should assign responsibility to the appropriate level of management for use, follow-up and management of the log.	UNM Cancer Center agrees with the recommendation. UNMCC will create a process and log to record incidents of missing portable devices. Key elements will include: date of discovery, relator, description of incident, description or unique identifier of unit lost, chain of communication (i.e. who incident was reported to), resolution of incident (i.e. re-inventory taken and media found, media not found; HIPAA Breach Notification Form completed and submitted appropriately).	6/30/2015	CC provided a copy of an SOP entitled "Management and Security of Portable Devices." Per the SOP, the Compliance Officer will log and evaluate the severity of the incident and decide how to proceed. The SOP does not specify the time allotted for that procedure. Due to the time constraints for HIPAA reporting, the time allotted should be noted in order to facilitate timely investigations.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 2 - Timely Removal of PHI from USB</u>	The Chief Financial Officer of the CC should work with the HSC IT Security Office to ensure that the CC develops procedures relating to proper use of portable devices. They should require, but not be limited to, erasure of data immediately following transference of information from one area to another. The Chief Financial Officer of the CC should communicate these procedures to all portable device users. In addition, the CC should monitor the process to ensure staff follow the correct procedures.	UNM Cancer Center agrees with the recommendation. UNMCC will work with HSC IT Security to develop a procedure for the management and security of portable media used in UNM Cancer Center Radiation Oncology department. The procedure will include periodic review of processes to ensure compliance.	6/30/2015	Received the CC SOP entitled "Management and Security of Portable Devices." It mentions that a monthly audit will be conducted, but is not specific with regard to who is responsible for conducting the audit. IA will review the most recent monthly audit for adequacy.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 3 - Adequate Protection of Information on USB's-Encryption</u>	The Chief Financial Officer of the CC should work with the HSC IT Security Office to ensure that they encrypt all portable devices.	UNM Cancer Center agrees with the recommendation. UNM Cancer Center will work with HSC IT Security to investigate solutions that will allow us to encrypt the USB drives used for transferring data between radiation oncology treatment systems. Key considerations with this solution will involve securing encryption capabilities that will be compatible with the proprietary software of the treatment planning systems.	6/30/2015	Received the CC SOP entitled "Management and Security of Portable Devices." It mentions that the CC moved to using only IMATION IRONKEY F200 encrypted USB's. IA will go verify by inspection.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 4 - USB Inventory</u>	The Chief Financial Officer of the CC should ensure that the CC develops an inventory process for portable devices and that they perform and document reconciliations at minimum on a monthly basis. The process should include a specific device assignment and/or check out system and ongoing documentation of information loaded onto and removed from each device by date.	UNM Cancer Center agrees with recommendation and will develop and document an inventory process to ensure management and security of portable devices including a timely inventory (at a minimum monthly) of devices.	6/30/2015	Received the CC SOP entitled "Management and Security of Portable Devices." In addition, CC submitted a copy of the April inventory log. It indicates that one USB was checked out and returned. IA inquired about a complete list of USB's at the Cancer Center, and documentation of ongoing location of all USB's.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 5 - Archived PHI</u>	The Chief Financial Officer of the CC should explore the feasibility of using the PACS system for archiving information.	UNM Cancer Center will investigate the possibility of utilizing a PACS system for archiving ongoing treatment and planning data. In regards to existing archived storage on portable CDs, UNM Cancer Center is currently in the process of moving this data from the CD archives to a shared network folder. The transition of this data to the network folder to be completed by April 30, 2015. In regards to archived storage on tape media, an RFP to be issued for the permanent archive of this media from tape to a networked server/folder. To be completed by June 30, 2015.	6/30/2015	4/23/15 Cancer Center (CC) is working to move archived data on CDs to a network folder. CC is investigating the possibility of utilizing the PACS system for archiving. CC is working on an RFP for storage of archived tape media.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2015-14	<u>Cancer Center Portable Devices</u>	<u>Recommendation 6 - Archived PHI</u>	The Chief Financial Officer of the CC should ensure that the CD inventory documentation process includes a mandated maximum check out time and regular monitoring and reconciliation of CDs in the vault.	UNM Cancer Center agrees with recommendation and will develop and document an inventory process to ensure management and security of CDs, which would include a check out and inventory procedure.	6/30/2015	Cancer Center has developed a monthly CD reconciliation process. Internal Audit will review a monthly reconciliation once completed.		RODNEY MARTINEZ, Chief Financial Officer: UNM Cancer Center
2015-02	<u>UNM Taos</u>	<u>Recommendation 1 - Develop a Comprehensive Business Operations Manual</u>	Develop and implement a comprehensive business operations manual that outlines policies and procedures for specific business functions. Consider adding resources to the business office to strengthen internal controls within the accounting function.	Develop comprehensive business and IT security policies and procedures modeled in part on branch operations for UNM Valencia and Gallup. Training of Business Office staff will also be part of the implementation. The addition of a full-time employee will be implemented with the start of the new fiscal year of July 1, 2015.	12/15/2015			Mario Suazo, Dir, Business Opns/Sm Branch; Thomas Duran, Business Manager; Joaquin Cantu, Unit IT Support Manager
2015-02	<u>UNM Taos</u>	<u>Recommendation 2 - Enforce Reserve Policies and Procedures</u>	Prepare and maintain adequate supporting documentation for dedicated reservations. Reserves intended for specific purposes and are currently reported as discretionary should be designated as dedicated at the beginning of each fiscal year.	Assign dedicated categories with specific purposes for carry over reserves as per Policy UAPP 7000.	8/31/2015			Catherine O'Neill, Executive Dir, Br Campus
2015-02	<u>UNM Taos</u>	<u>Recommendation 3 - Enforce Cash Management Training</u>	All UNM-Taos employees that handle, or have access to, cash should take Cash Management training.	Schedule training for regular employees and work studies involved in Cash Management functions as per UAP 7200.	12/15/2015			Mario Suazo, Dir, Business Opns/Sm Branch; Thomas Duran, Business Manager
2015-02	<u>UNM Taos</u>	<u>Recommendation 4 - Social Security Numbers</u>	The UNM-Taos Business Office should not maintain social security numbers on any documentation. Social security numbers should be immediately disposed of once disbursements have been processed. The reason for any change in pay rates for disbursements should be properly documented, reviewed, and approved.	Implement procedures to eliminate social security numbers once disbursements have been processed. All Reimbursement and Departmental Invoices will be reviewed and updated to remove personally identifiable information and updates in payment rates will be documented, reviewed and approved.	9/30/2015	UNM Taos updated the forms at the end of the Spring term and put them into use beginning with the Summer semester, provided there are any art courses requiring models. Internal Audit reviewed the updated form and noted that social security numbers are not included on the forms. However, the form may not be needed until the Fall 2015 semester. Therefore, an extension has been requested for the full implementation of this corrective action.		Mario Suazo, Dir, Business Opns/Sm Branch; Thomas Duran, Business Manager

Follow Up Report - Recommendation Pending (June 2015 Open Session)

Project Code	Project Name	Recommendation Title	Executive Recommendation	Response	Estimated Implementation Date	Last Status Update	Actual Implementation Date	Responsible Party
2015-02	UNM Taos	<u>Recommendation 6 - Develop Policies and Procedures for Employer Issued Smart Phones</u>	In addition to UAPP 7710, UNM-Taos should further develop policies and procedures that require smart phones to be tagged, monitored, and inventoried.	A detailed inventory will be conducted on employee issued cell phones, a property ID tag or other suitable identifier will be assigned to each phone and use levels monitored on a quarterly basis. The Process for identifying the phone hardware serial numbers will be developed by the Business Office and IT departments. The Business and IT Departments will coordinate a sign out process in which individuals issued phones will acknowledge receipt, and get a handout with basic security requirements for using the phones, and procedures for enabling remote wiping by the employee being issued equipment. The procedures developed will adhere to guidelines in UAPP 7710.	6/30/2015			Mario Suazo, Dir,Business Opns/Sm Branch; Joaquin Cantu, Unit IT Support Manager
2015-02	UNM Taos	<u>Recommendation 7 - Touchnet Shared Desktop</u>	The UNM-Taos IT Department should install the payment system software on each cashier's workstation. UNM-Taos is aware that this is an issue and is in the planning stage of installing the payment system software on each of the cashier's workstations. Alternately, the three cashiers can be assigned individual user accounts to log on to the workstation.	The payment system software will be installed on each workstation being used for cashiering functions. Each user will be required to have a separate password.	6/30/2015			Mario Suazo, Dir,Business Opns/Sm Branch; Joaquin Cantu, Unit IT Support Manager
2015-02	UNM Taos	<u>Recommendation 8 - Develop General IT Security Policies and Procedures</u>	UNM-Taos IT Department should document IT security policies and procedures, which enforce procedures for regular back-up and off-site storage of IT systems, developing a disaster recovery plan, and encrypting computers issued to employees.	UNM-Taos IT will develop an operations manual documenting IT security policies and procedures. Procedures will be modeled on those implemented at UNM-Valencia and Gallup. The IT department has already started developing the process for backups and offsite storage, and will identify disaster recovery procedures, test them regularly once the backups are working as expected. Encryption will be implemented on an ongoing basis for laptops assigned to faculty and staff.	12/15/2015			Mario Suazo, Dir,Business Opns/Sm Branch; Joaquin Cantu, Unit IT Support Manager
2015-02	UNM Taos	<u>Recommendation 9 - All UNM Taos Employees Should Take Required Training</u>	All UNM Taos faculty, staff, and student employees should take the required annual training courses.	Determine which faculty, staff and students employees are required to the take the training. Develop a communication mechanism to inform and remind those who need the training and provide notification to supervisors.	12/31/2015			Catherine O'Neill,Executive Dir,Br Campus; Debra Martinez, HR Administrator 2

**Internal Audit Director’s Status Report
Audit and Compliance Committee Meeting
June 29, 2015**

ACTION ITEMS

Audit Committee Meeting Calendar for FY2016. The Committee meets at 9:00 AM in the Roberts Room.

- August 18, 2015
- November 5, 2015 (Exit Conference FY15 External Audit)
- February 18, 2016
- April 21, 2016 or May 19, 2016 (Entrance Conf. FY16 External Audit)

INFORMATION ITEMS

Audit Plan Status. The Fiscal Year 2015 (FY15) audit plan consisted of eight audits carried over from FY14. The project status and hours report for the plan is at Tab # 10c. The status of the proposed plan as of June 10, 2015 is:

Completed	12
Fieldwork	3
Report Writing	2
Subtotal	17
Unassigned/Deferred	5
Total	22

Department Financial Report. At Tab 9 is the Internal Audit Department’s budget status report for your review. The FY15 adjusted budget is \$838,596, of which \$802,250 is funded from the general pooled allocation, and \$36,346 from the departmental reserve. As of May 31, 2015, the department’s actual expenditures are \$744,487, and encumbrances are \$62,939. The Department expects to have estimated reserves of \$20,000 as of June 30, 2015.

Compliance Certification Summary. The Compliance Certification summary for the staff at the University (Main and Health Sciences Center) is as follows:

Main Campus:

- Helen Gonzales, MBA, Chief Compliance Officer is a Certified Compliance and Ethics Professional (CCEP)
- Eileen Sanchez, Compliance Specialist is a Certified Compliance and Ethics Professional (CCEP)

Health Science Center:

- Stuart Freedman, MPH, Chief Compliance Officer Health Sciences Center
- Purvi Mody, CPA, Executive Director, Compliance and Internal Audit, Health System is scheduled to take the Certified in Healthcare Compliance (CHC) exam in late June 2015
- Sophia Collaros, JD, MA, Privacy Officer is a Certified Information Privacy Professional (CIPP/US). Ms. Collaros is retiring at the end of June 2015

Internal Audit Director's Status Report
Audit and Compliance Committee Meeting
June 29, 2015

Stanton Royce, MBA, Senior Operations Manager & Ethics and Compliance Officer, Cancer Research and Treatment Center

Catherine Porto, MPA, Executive Director of Health Info Management, is a Registered Health Information Administrator (RHIA) and Certified Healthcare Privacy Professional (CHPP)

Valentina Golub, BS, Director of Health Info Management, is a Registered Health Information Administrator (RHIA) and holds a Certified Healthcare Privacy and Security certification

Index: 676000 - 113280-AUDIT DEPARTME-General Activ

Account Description	Budget (FYTD) Adopted	Budget (FYTD) Adjustments	Budget (FYTD) Accumulated	Actuals Current Month	Actuals Pct	Actuals Fiscal YTD	Actuals Pct	Encumbrances	Balance Available	Balance Pct
Revenue										
0340 - University Hospital Revenue!	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$825.00	.00%	\$0.00	(\$825.00)	.00%
08Z0 - Miscellaneous Gen	\$0.00	\$0.00	\$0.00	\$5,000.00	.00%	\$5,000.00	.00%	\$0.00	(\$5,000.00)	.00%
1640 - Allocations Pooled Allocatio!	\$776,691.00	\$0.00	\$776,691.00	\$0.00	.00%	\$776,691.00	100.00%	\$0.00	\$0.00	.00%
1660 - Allocations Other Gen	\$0.00	\$25,559.00	\$25,559.00	\$0.00	.00%	\$25,559.00	100.00%	\$0.00	\$0.00	.00%
1900 - Reserves	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$36,346.35	.00%	\$0.00	(\$36,346.35)	.00%
1901 - Budgeted Use of Reserves	\$61,905.00	(\$25,559.00)	\$36,346.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$36,346.00	100.00%
*TOTAL Revenue	\$838,596.00	\$0.00	\$838,596.00	\$5,000.00	.60%	\$844,421.35	100.69%	\$0.00	(\$5,825.35)	(.69%)
Expense										
2020 - Administrative Professional !	\$697,764.00	\$0.00	\$697,764.00	\$55,752.43	7.99%	\$628,197.26	90.03%	\$58,146.89	\$11,419.85	1.64%
2060 - Support Staff Salary Detail !	\$38,932.00	\$0.00	\$38,932.00	\$2,994.76	7.69%	\$34,305.65	88.12%	\$4,791.65	(\$165.30)	(.42%)
20J0 - Student Salaries Gen	\$20,000.00	\$0.00	\$20,000.00	\$808.80	4.04%	\$17,713.20	88.57%	\$0.00	\$2,286.80	11.43%
20P0 - Temporary Salary Gen	\$15,000.00	\$0.00	\$15,000.00	\$70.92	.47%	\$2,874.74	19.16%	\$0.00	\$12,125.26	80.84%
3100 - Office Supplies General	\$3,000.00	\$0.00	\$3,000.00	\$31.18	1.04%	\$1,207.07	40.24%	\$0.00	\$1,792.93	59.76%
3110 - Books Periodicals Gen	\$400.00	\$0.00	\$400.00	\$0.00	.00%	\$56.00	14.00%	\$0.00	\$344.00	86.00%
3140 - Computer Software Gen	\$500.00	\$0.00	\$500.00	\$0.00	.00%	\$380.00	76.00%	\$0.00	\$120.00	24.00%
3150 - Computer Supplies <\$5,001	\$300.00	\$0.00	\$300.00	\$132.99	44.33%	\$256.02	85.34%	\$0.00	\$43.98	14.66%
31A0 - Business Food - Local	\$1,100.00	\$0.00	\$1,100.00	\$0.00	.00%	\$674.75	61.34%	\$0.00	\$425.25	38.66%
31C0 - Dues Memberships Gen	\$3,500.00	\$0.00	\$3,500.00	\$0.00	.00%	\$3,740.00	106.86%	\$0.00	(\$240.00)	(6.86%)
31J0 - Parking Permits Gen	\$600.00	\$0.00	\$600.00	\$0.00	.00%	\$444.00	74.00%	\$0.00	\$156.00	26.00%
31K0 - Postage Gen	\$50.00	\$0.00	\$50.00	\$0.00	.00%	\$4.24	8.48%	\$0.00	\$45.76	91.52%
3800 - In State Travel Gen	\$1,000.00	\$0.00	\$1,000.00	\$0.00	.00%	\$2,592.40	259.24%	\$0.00	(\$1,592.40)	(159.24%)
3805 - Instate Travel-Per Diem Sta!	\$200.00	\$0.00	\$200.00	\$0.00	.00%	\$504.00	252.00%	\$0.00	(\$304.00)	(152.00%)
3810 - Instate Travel-Per Diem No!	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$268.80	.00%	\$0.00	(\$268.80)	.00%
3820 - Out Of State Travel Gen	\$5,000.00	\$0.00	\$5,000.00	\$0.00	.00%	\$3,017.17	60.34%	\$0.00	\$1,982.83	39.66%
3825 - Out State Travel-Per Diem !	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$274.50	.00%	\$0.00	(\$274.50)	.00%
3830 - Out State Trvl-Per Diem No!	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$158.60	.00%	\$0.00	(\$158.60)	.00%
39Z1 - Travel Non UNM Emp-Non !	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$0.00	.00%
6000 - Telecom Charges Gen	\$4,000.00	\$0.00	\$4,000.00	\$292.50	7.31%	\$3,217.50	80.44%	\$0.00	\$782.50	19.56%
6020 - Long Distance Gen	\$100.00	\$0.00	\$100.00	\$0.44	.44%	\$44.99	44.99%	\$0.00	\$55.01	55.01%
6060 - Voice Mail Box Gen	\$600.00	\$0.00	\$600.00	\$50.00	8.33%	\$550.00	91.67%	\$0.00	\$50.00	8.33%
6300 - Alarm System Gen	\$150.00	\$0.00	\$150.00	\$11.25	7.50%	\$260.83	173.89%	\$0.00	(\$110.83)	(73.89%)
6315 - Electronic Databases	\$0.00	\$0.00	\$0.00	\$2,396.21	.00%	\$4,145.27	.00%	\$0.00	(\$4,145.27)	.00%

Index: 676000 - 113280-AUDIT DEPARTME-General Activ

Account Description	Budget (FYTD) Adopted	Budget (FYTD) Adjustments	Budget (FYTD) Accumulated	Actuals Current Month	Actuals Pct	Actuals Fiscal YTD	Actuals Pct	Encumbrances	Balance Available	Balance Pct
6340 - Auditing Services Gen	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$0.00	.00%
63A0 - Conference Fees Gen	\$6,000.00	\$0.00	\$6,000.00	\$0.00	.00%	\$2,495.00	41.58%	\$0.00	\$3,505.00	58.42%
63A2 - Seminars/Training Fees	\$3,000.00	\$0.00	\$3,000.00	\$0.00	.00%	\$8,068.00	268.93%	\$0.00	(\$5,068.00)	(168.93%)
63C0 - Copying Gen	\$50.00	\$0.00	\$50.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$50.00	100.00%
63V1 - Consultant Fees & Svcs-Fo!	\$250.00	\$0.00	\$250.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$250.00	100.00%
69Z0 - Other Professional Services!	\$7,000.00	\$0.00	\$7,000.00	\$1,082.92	15.47%	\$10,202.12	145.74%	\$0.00	(\$3,202.12)	(45.74%)
70E0 - Computer Hardware Mainte!	\$3,200.00	\$0.00	\$3,200.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$3,200.00	100.00%
70E1 - Computer Software Mainten!	\$17,300.00	\$0.00	\$17,300.00	\$0.00	.00%	\$10,415.82	60.21%	\$0.00	\$6,884.18	39.79%
70F0 - Equipment Rent Expense G!	\$5,000.00	\$0.00	\$5,000.00	\$381.50	7.63%	\$4,147.28	82.95%	\$0.00	\$852.72	17.05%
80E0 - Contingency Budget Gen	\$0.00	\$0.00	\$0.00	\$0.00	.00%	\$0.00	.00%	\$0.00	\$0.00	.00%
80K0 - Banner Tax	\$600.00	\$0.00	\$600.00	\$43.77	7.30%	\$571.23	95.21%	\$0.00	\$28.77	4.80%
80K2 - Foundation Surcharge	\$4,000.00	\$0.00	\$4,000.00	\$320.03	8.00%	\$3,701.07	92.53%	\$0.00	\$298.93	7.47%
*TOTAL Expense	\$838,596.00	\$0.00	\$838,596.00	\$64,369.70	7.68%	\$744,487.51	88.78%	\$62,938.54	\$31,169.95	3.72%

Index: 676000 - 113280-AUDIT DEPARTME-General Activ

Account Description	Budget (FYTD) Adopted	Budget (FYTD) Adjustments	Budget (FYTD) Accumulated	Actuals Current Month	Actuals Pct	Actuals Fiscal YTD	Actuals Pct	Encumbrances	Balance Available	Balance Pct
Total Revenue:	\$838,596.00	\$.00	\$838,596.00	\$5,000.00	.60%	\$844,421.35	100.69%	\$.00	(\$5,825.35)	(.69%)
Total Expense:	\$838,596.00	\$.00	\$838,596.00	\$64,369.70	7.68%	\$744,487.51	88.78%	\$62,938.54	\$31,169.95	3.72%
Net:	\$.00	\$.00	\$.00	(\$59,369.70)	.00%	\$99,933.84	.00%	(\$62,938.54)	\$36,995.30	.00%

Parameters:

Index: 676000 - 113280-AUDIT DEPARTME-General Activ

Groupings:

Warning: These reports will show fiscal year activity. For inception to date activity for Grants please use the FRRGLDS - Grant Ledger Detail Summary report.

EXECUTIVE SESSION