

UNM Compliance Hotline

1-888-899-6092

or

unm.ethicspoint.com

24/7

Anonymous &
Confidential

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COMPLIANCE NEWS

In Compliance is a newsletter published by the Main Campus Compliance Office. It will be distributed quarterly and provides updates about top news regarding compliance, risk management, equal opportunity, and other important matters.

The University of New Mexico is committed to the highest standards of integrity, controls, risk management, and ethics in pursuit of its mission of comprehensive education, research, and service programs.

The University seeks to comply with all applicable laws, regulations, and policies. UNM faculty, staff, students, and members of the greater community are encouraged to report good faith concerns about suspected misconduct and possible violations of law, regulations, or policies to their respective supervisors, departments, and units. UNM takes all reports of misconduct or wrongdoing seriously. There might be a concern about adequate steps being taken to resolve concerns or a fear of retaliation for reporting concerns. Individuals may make inquiries and file complaints and allegations through the Main Campus Compliance Office. Inquiries, complaints and allegations may arrive through many channels: phone call, letter, email, hotline submission, etc.

The U.S. Sentencing Commission's Federal Sentencing Guidelines for Organizations were originally published in 1991 to ensure that organizations do not benefit from wrongdoing or misconduct. The guidelines also provide incentives for organizations to implement compliance programs.

In accordance with the Guidelines, there are seven key criteria for establishing an effective compliance program.



DID YOU KNOW...

Since its inception in 2015, the EthicsPoint Hotline has received, and UNM has reviewed and investigated, more than 1200 cases

Compliance standards and procedures must be established to detect criminal and unethical conduct.

1. High level personnel must be knowledgeable and involved in oversight.
2. Substantial discretionary authority must be carefully delegated.
3. Compliance standards and procedures must be communicated to employees.
4. Reasonable steps must be taken to achieve compliance in the establishment of monitoring and auditing systems and of reporting systems with protective safeguards.
5. Compliance and ethics programs must be promoted and consistently enforced.
6. Any violations require appropriate responses to prevent similar conduct, which may include modification of compliance standards and procedures and other preventive measures.

In January 2013, using these Guidelines as a roadmap and evaluating peer institutions and best practices, UNM created a Main Campus Compliance Program. Regents' Policy Manual (RPM) 7.2 was amended in September 2014 to ensure that University activities are conducted in compliance with applicable federal and state laws and regulations and with the highest ethical standards.

UNM'S MAIN CAMPUS INSTITUTIONAL COMPLIANCE COMMITTEE

The Compliance Program structure includes an oversight committee. The Institutional Compliance Committee provides university-wide support for the Main Campus Compliance Program. Compliance Partners, including high-level personnel from 18 different departments and offices across the campus, are represented on the Committee. Administrative partners on the Committee have responsibility and expertise in the major compliance areas, including athletics, human resources, research, student affairs, facilities, and finance. The Committee meets quarterly and is chaired by the Chief Compliance Officer.

UNM'S COMPLIANCE HOTLINE

The UNM Compliance Hotline is the main reporting system for the UNM community to make inquiries, file complaints, and report alleged misconduct and violations of laws, regulations, and policies. The

Compliance in the news...

Graham Spanier, 2 Other Ex-Penn State Officials Get Jail Time in Sandusky Case

<http://www.chronicle.com/blogs/ticker/graham-spanier-2-other-ex-penn-state-officials-get-jail-time-in-sandusky-case/118771>

Title IX sets a positive path for higher education; compliance should not be feared

<https://www.dallasnews.com/opinion/commentary/2017/01/23/title-ix-sets-positive-path-higher-education-compliance-feared>

Baylor Regents Announce Structural Completion of the 105

Recommendations, Updates Governance Leadership and Structure
<http://www.baylor.edu/mediacommunications/news.php?action=story&story=181484>

Compliance Hotline operates 24 hours a day, seven days a week. In March 2015, the Main Campus Compliance Office took over the Compliance Hotline from the UNM Internal Audit Department when a new vendor was chosen and the current system was implemented.

The Compliance Hotline uses EthicsPoint, a case management system provided by Navex Global that has the capability to accommodate allegations and document information gathered from an investigation. This operating system is used by numerous colleges and universities who are peer institutions to UNM. The Main Campus Compliance Office administers the Compliance Hotline for UNM Main and Branch Campuses, UNM Health Sciences Center, UNM Hospital, UNM Medical Group, and Sandoval Regional Medical Center.

COMPLIANCE ISSUES

U.S. Department of Justice Agreement

The U.S. Department of Justice, the United States Attorney's Office for the Federal District of New Mexico, and the University entered into an Agreement on October 17, 2016, involving UNM's obligations under federal civil rights laws to prevent and address sexual misconduct, and to provide clear and consistent policies and procedures for reporting, investigating, and responding to such conduct. UNM agreed to undertake certain actions during the three-year Agreement.

Compliance with the DOJ agreement will constitute a significant campus-wide effort over the next three academic years. The Main Campus Compliance Office is overseeing the process to confirm that UNM is meeting its requirements and deadlines under the agreement. In the past six months, UNM has made significant progress in complying with the delineated tasks and implementing improvements.

Some highlights include:

- UNM has trained thousands of employees about workplace harassment including sexual harassment, various types of discrimination, Title IX, and the Campus SaVE Act.
- Staff members at the UNM Police Department, Office of Equal Opportunity, and Dean of Students Office have collectively participated in more than 1,200 hours of training focused on Title IX, Trauma Informed Investigation, Inherent Bias, and Rape Crisis.

UNM COMPLIANCE TRAINING OPPORTUNITIES

There is a wide-range of Compliance related courses available through UNM's Learning Central system. Information on these courses and a link to Learning Central is available on the Compliance Office website.

As part of the Agreement, UNM has improved its procedures to provide reliable, prompt, and impartial investigation, adjudication, and appeal of all complaints of sexual harassment and misconduct.

Minors on Campus

UNM programs involving youth exist in multiple units across the campus. The safety of minors on campus who are involved in campus-sponsored functions is a serious concern. In March 2016, UNM Policy 2205 was adopted regarding Minors on Campus to help protect the many thousands of children who visit the campus each year.



When the policy was implemented, a waiver form and checklist were also created and distributed. A Minors on Campus training, available through UNM's Learning Central, was developed for employees who work with minors. In 2017, Minors on Campus Taskforce will continue to work on additional important issues impacting youth on the campus. Additional information regarding Minors on Campus can be found at: <http://compliance.unm.edu/minors-on-campus/index.html>.

UPDATED WHISTLEBLOWER POLICY

On May 10, 2017, President Abdallah signed the updated Whistleblower Policy. UNM relies on each member of the community to comply with the laws, regulations, University policies, and ethical and professional standards that relate to them. The University also relies on honesty, integrity, and good judgment. Members of the University community are expected, and in some cases required, to report suspected misconduct that comes to their attention. Persons who report suspected misconduct, in good faith, are afforded whistleblower protection from retaliation by the University for such reporting. Here is a link to UAP 2200 on UNM's Policy Office website:

<http://policy.unm.edu/university-policies/2000/2200.html>