


MEMORANDUM

To: All HSC Faculty

From: Richard Larson, MD, PhD
Executive Vice Chancellor
Vice Chancellor for Research



Date: 16 February 2018

RE: Implementation of DFARS Clause 252.204-7012, Safeguarding Covered Defense Information and Cyber Incident Reporting

The University (UNM) has initiated a programmatic effort to ensure compliance with the Federal Controlled Unclassified Information (CUI) program regulations. This memo clarifies the process that faculty should follow at the UNM Health Sciences Center to assure compliance with CUI program regulations, when applicable. This issue most frequently comes up in our extramural contracting with federal agencies.

CUI is information that requires safeguarding or dissemination controls pursuant to and consistent with applicable law, regulations, and government-wide policies but is not classified under Executive Order 13526 or the Atomic Energy Act, as amended.

The HSC's Executive Vice Chancellor's Office, in collaboration with the HSC Sponsored Projects Office (SPO), and UNM's Information Security & Privacy Office, have established an interim procedure to address federal research contracts with CUI and the related DFAR provisions (which are applicable to Department of Defense information). These offices will help the Principal Investigator determine if these provisions and requirements are applicable to specified research. If provisions are required, these offices will assist in ensuring safeguards are properly put in place for the research contract.

If you have questions regarding NIST 800-171 compliance, or you are unsure about the CUI requirements on existing or future contracts, please contact Stacy Bigbie from the HSC Sponsored Projects Office at 505-272-9448 or SCatanach@salud.unm.edu, who will work with UNM's Information Security and Privacy Office to ensure that all safeguards and reporting mandated by the research contract are in place currently or prior to commencement of the project.

A similar memo has been issued by main campus has also been issued. The UNM Health Sciences Center is participating in this University-wide effort to comply with the initiative to implement the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-171, as deemed necessary, through the process articulated in this memo. In other words, please work directly with HSC Sponsored projects office when this issue comes up in your contracting and they will assist.